

Eurochild Public Privacy Policy

This Eurochild public privacy policy provides details about the personal data the international non-profit-making association known as **Eurochild AISBL** (hereinafter, “Eurochild”, “we” or the “Association”) collects from you as either a participant to a Eurochild event, a consultant or a supplier, a job applicant or any other member of the general public whose personal data Eurochild may process (together “you”).

The aim of this privacy policy is to provide you with transparent and clear information about the data protection practices and policies of Eurochild as the data controller. Eurochild wants to put you in control of your personal data and to let you understand, in accordance with the applicable legislation, how and why we use your personal data. The concept of personal data is broad and encompasses any type of information related to you, as a directly or indirectly identifiable natural person.

We recommend you read this privacy policy carefully in order to better understand our practices regarding the processing of your data. The protection of your data and privacy is of utmost importance for us at Eurochild. We comply with data protection laws, including the European Regulation 2016/679 of 27 April 2016 on the protection of personal data (the “**GDPR**”) and any other applicable national act or regulation regarding the processing of personal data or the protection of privacy.

1. Eurochild’s role as a data controller

The data controller responsible for the processing of your data is Eurochild AISBL, having its registered offices at Rue de la Charité 22 1210 Brussels, Belgium, (postal address: Avenue des Arts 7/8, 1210 Brussels, Belgium).

As a data controller we solely and autonomously determine the purposes and means of the processing of your personal data.

2. What data Eurochild collects

We collect and process your personal data only for the purposes set out in this Policy.

Eurochild may process the following categories of personal data about you, depending on the categories of data subjects to which you belong:

Event/Activities participants	Parent/guardian of the child participating in Eurochild’s activities	Children (under 18 year)	Consultants & Suppliers	Job applicants	Any other member of the general public (for policy reasons)
first name, last name	First name, last name	First name, last name	First name, last name	First name, last name	first name, last name
e-mail and skype addresses	e-mail address	e-mail address	e-mail and skype addresses	e-mail and skype addresses	e-mail address
address, incl. country	Address, incl. country	Address, incl. country	address, incl. country	address, incl. country	Address, incl. country
phone and mobile phone numbers	phone and mobile phone numbers	phone and mobile phone numbers	phone and mobile phone numbers	phone and mobile phone numbers	nationality
passport and ID details	Relationship to the child	passport and ID details, family situation, age	passport and ID details	passport and ID details	Passport and ID details, work phone, date of birth

travel details		Travel details	VAT number, permit of work if applicable	Belgian permit of work if applicable	organisation
Academic record and position		Academic background, organisation supporting children's participation	Academic/professional background	Curriculum vitae	biographical info
Disability, dietary requirements, allergies		Disability, dietary requirements, allergies, medication	Date/Place of birth	Date/Place of birth	position, department, unit
Financial information such as bank details		Leisure activities or interests	Bank details		
Communications e.g. emails		Communications e.g. emails	Communications e.g. emails		
Website usage data, such as data usage and IP address		Website usage data, such as data usage and IP address	Website usage data, such as data usage and IP address	Website usage data, such as data usage and IP address	Website usage data, such as data usage and IP address
				Criminal convictions or disciplinary proceedings	
Photos		Photos		Photos	

Eurochild events & activities may be audio or video recorded, posted as a podcast, photographed, published and archived. By registering, participants grant Eurochild permission for use of images taken during the event or activity for publicity and fundraising purposes, and to create awareness and distribute information on the event or activity. If you wish that your image or voice is not recorded and published, please contact the organisers who will make every effort to accommodate your needs.

In any situation where children are involved in Eurochild activities or projects, Eurochild may also process personal data about any witnessed, suspected or alleged violation of its Child Protection Policy which is reported.

3. On which legal basis and for what purposes do we process your data?

We always process your personal data on the basis of and within the boundaries of the legal bases as those are laid down under applicable law. We also ensure to limit the processing of your personal data to what is strictly necessary for the achievement and performance of these purposes.

3.1 Your consent

When we process your personal data, we strive to rely on your consent, to put you in control of your personal data. Subject to obtaining your prior and specific consent and in accordance with the applicable law, we may process your personal data:

- Such as e-mail address, in order to send you personalised information, newsletters or various publications to which you subscribe; or
- To communicate your contact details to the event's participants;
- As a child, to acknowledge your presence in Eurochild's activities or projects and before capturing your image in that context;
- If you are the parent or legal guardian of a child participating in one of Eurochild's events, to keep you updated on issues related to the event to which your child participates; and
- As a job candidate, to process data relating to your criminal convictions or disciplinary proceedings as part of the screening process;

- To enable events' participants with certain health conditions to benefit from our services (e.g. participate in Eurochild's events and activities), we may request participants to indicate whether they have specific dietary requirements or other specific needs (e.g. in case of disability).

You always have the right to withdraw your consent at any time.

3.2 Performance of our duties

We may also process your personal data where this is necessary for the performance of our legal duties or the performance of our contractual obligation towards you. In such a case, we limit the processing of your personal data to the extent of what is strictly necessary.

We process event participants' personal data for the purpose of the event registration, namely to ensure the good processing and follow-up of your registration when organising Eurochild's events, incl. preparation of lists for contacts, participant lists and rooming lists, circulating pre-event information and meeting follow-up. We limit the processing of event participants' personal data to what is strictly necessary for the achievement and performance of this purpose.

We process Job Applicants' personal data for the purpose of the evaluation of their application and the further follow-up, incl. interview, background check, etc. We limit the processing of Job Applicants' data to what is strictly necessary for the achievement and performance of this purpose.

3.3 Legitimate interest of Eurochild

When not strictly necessary for any of the abovementioned reasons, Eurochild may also process your personal data for other purposes, falling under the achievement and the realisation of its legitimate interests. In such a case, however, Eurochild maintains a fair balance between the need to process your data and the preservation of your rights and freedoms, including the protection of your privacy. Whenever this is the case, Eurochild will keep you informed about what type of legitimate interest we are pursuing and provide you with transparent information about the processing operations and your rights.

Against this background, we may process your personal data to run day to day operations, manage any incident or allegation of violations of Eurochild's Child protection Policy, ensure the security of Eurochild's premises, send you further information from Eurochild or contact certain members of the public, including without limitation policymakers, stakeholders and journalists on legislative issues, and communicate the position of Eurochild on policy issues, namely to promote the rights and well-being of children and young people. This information can be either obtained directly or collected from other sources.

4. With whom and how do we share your data?

Your personal data will never be shared with third parties without your express prior consent. The only exceptions to this apply in the following cases:

4.1 For prosecution reasons

Where required in order to investigate the unlawful use of our services or for the purposes of prosecution, personal data will be disclosed to the relevant law enforcement authorities and, where applicable, to any third-party claimants. However, such a course of action will only take place if there is concrete evidence of unlawful conduct or misuse. In such cases, your data may also be shared if doing so is required for the fulfilment of terms and conditions of use or other agreements. If requested, we are also legally obligated to disclose such data to certain public authorities, such as law enforcement bodies, authorities that penalise offences with financial penalties, and financial authorities.

In these cases, data is disclosed on the basis of our legitimate interest in combating misuse, aiding the prosecution of criminal offences, and aiding the establishment, assertion and enforcement of claims, in line with point (f) of Article 6(1) of the GDPR. If you require further information about the balancing of interests that must be carried out in accordance with point (f) of Article 6(1) of the GDPR, please contact us using the details provided below.

4.2 Processors

We rely on contractually bound third-party companies and external service providers (referred to as “processors”) in order to provide our services. In such cases, personal data will be shared with these processors in order to allow them to continue providing their services. The processors have been carefully selected by us and are subject to regular audits. The processors are permitted to use the data only for the purposes specified by us. Furthermore, they are contractually obligated to handle your data exclusively in accordance with this privacy policy and in line with the applicable data protection laws.

More specifically, we use the services of the following processors in particular:

- Providers and consultants for events organisation;
- Service providers for the distribution of newsletters, the execution of surveys or the organisation of online meetings or webinars;
- Service providers for study research, statistics, scientific studies, etc.;
- Logistics service providers, for the purpose of sending you materials relating to the Association’s activities;
- Payment service providers for the purpose of processing all payments from you to us or vice versa;
- IT service providers for the provision of hardware and software and for the implementation of maintenance work.

Data is disclosed to processors on the basis of Article 28(1) of the GDPR or, alternatively, on the basis of our legitimate interests in the economic and technical advantages associated with the use of specialised processors and on the basis of circumstances in which your rights and interests in the protection of your personal data are not overridden (see point (f) of Article 6(1) of the GDPR). If you require further information about the balancing of interests that must be carried out in accordance with point (f) of Article 6(1) of the GDPR, please contact us using the details provided above.

4.3 Other recipients

Your personal data may also be shared with:

- The European Commission and other funders for reporting activities;
- Our partners and external suppliers (e.g. hotels) for the management of projects and events;
- The other participants if you have given us the permission to do so in the event registration form (name, affiliation and country), with a view to facilitating future contacts; and
- The child's family (or guardian) and the child's supporting organisation in the event of any witnessed, suspected or alleged violation of Eurochild's Child Protection Policy.

Data is disclosed to such recipients on the basis of the performance of our contractual obligation related to the organisation of events and projects and our legitimate interest in fulfilling our reporting duties. If you require further information about the balancing of interests that must be carried out in accordance with point (f) of Article 6(1) of the GDPR, please contact us using the details provided below.

5. What are your rights?

5.1 Access, rectification, erasure, portability and objection rights

For all the purposes defined above, and subject to applicable data protection laws, you have the following rights:

- The right to ask us to provide you with copies of personal data that we hold about you at any time, which include the right to ask us: whether we process your personal data, for what purposes; the categories of data; the recipients to whom the data are shared;
- The right to ask us to update and correct any out-of-date or incorrect personal data that we hold about you;
- Where your consent has been given, the right to withdraw such consent at any given time, without affecting the lawfulness of processing based on consent before its withdrawal;
- The right to erasure within the limits afforded by data protection legislation;

- The right to oppose to the processing of your personal data, within the limits afforded by data protection legislation;
- The right to data portability within the limits afforded by data protection legislation;
- The right to restriction of processing insofar the conditions under the data protection legislation have been met; and
- The right to opt out of any direct marketing communications that we may send you

5.2 How to exercise those rights?

You may at any time exercise the abovementioned rights in accordance with data protection regulations, by sending a request with a copy of your ID card (passport or other proof of identity) to dataprivacy@eurochild.org or in writing at Avenue des Arts 7/8, 1210 Brussels, Belgium, and subject to complying with our reasonable requests to verify your identity.

5.3 Right to lodge a complaint

You can also lodge a complaint to the Belgian Data Protection Authority either by post at rue de la Presse 35, 1000 Brussels, or by filling in and uploading the online form made available at <https://www.dataprotectionauthority.be/citizen/actions/lodge-a-complaint> or by phone at +32 2 274 48 00 or +32 2 274 48 35.

6. How long do we keep your personal data?

We will not store your personal data beyond the time necessary for the performance of the purposes for which the data is processed.

More specifically, we apply the following guidelines:

- Personal data relating to suppliers and consultants will be retained for a period of 10 years;
- Personal data relating to rejected job applicants will be retained for a maximum period of 2 years after the recruitment process has ended;
- Personal data relating to participants to our events will be retained for a period of 5 years;
- Personal data used for information-sharing purposes will be retained for as long as we are sending you relevant information about Eurochild. As soon as we note that your contact details are no longer accurate or active, or whenever you decide to use your right to unsubscribe, we will no longer keep your personal data for these purposes;
- Personal data relating to relevant Eurochild stakeholders will be retained for as long as the stakeholder is engaged in our activities;
- Personal data relating to children will be retained for as long as the individual is engaged in our activities and up to 5 years after the relevant activity;
- Personal data relating to suspected or alleged violation of Eurochild's Child Protection Policy will be retained pending the conclusion of the investigation; and
- We may also keep personal data as long as it is necessary to comply with our legal obligations (including bookkeeping, social and tax obligations) or to resolve disputes and/or enforce our rights.

More information on our retention periods is available upon simple request.

7. International transfers

In connection with the abovementioned purposes, we may need to transfer your personal data to a country located outside the European Economic Area.

When we transfer personal data that we collect from you to countries that are outside of the European Economic Area, we guarantee:

- The existence of an adequacy decision within the meaning of Article 45 of the GDPR;
- The effective implementation of appropriate safeguards within the meaning of Article 46 of the GDPR, such as the entering into of the standard contractual clauses issued by the European Commission or the establishment of Binding Corporate Rules; and/or

- To the extent necessary, the adoption and implementation of additional measures within the meaning of Recital 109 of the GDPR.

We may also transfer your personal data on the basis of a derogation for a specific situation within the meaning of article 49 of the GDPR.

For further information, including obtaining a copy of the documents used to protect your personal data, please contact us at dataprivacy@eurochild.org.

8. How do we protect your personal data?

We take appropriate technical and organisational measures to safeguard and protect your personal data, against unauthorised or unlawful processing and against accidental destruction, loss, access, misuses, damage and any other unlawful forms of processing of the personal data in our possession.

9. Children under 18

Unless otherwise stated by law, Eurochild treat young people as “minor” until they are aged 18.

Eurochild may process personal data about children when they are involved in Eurochild activities or projects.

Eurochild always asks the prior consent of the child and of its parent or legal guardian before involving the child in Eurochild's activities or projects and before capturing the child's image in that context.

10. How to contact us?

If you have any questions or comments about this privacy policy, if you would like to exercise your rights, or to update the information we have about you or your preferences, please contact us here:

dataprivacy@eurochild.org or in writing at **Avenue des Arts 7/8, 1210 Brussels, Belgium**

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