

## Management system manual (EOTA MSM)

### Data Protection Policy

Update of May 2018 according to the General Data Protection Regulation (EU) 2016/679<sup>1</sup>

EOTA is an international organisation. The registered seat is Brussels, whereas its cooperating and committed partners are seated elsewhere in Europe. Hence, EOTA acts as coordinator facilitating the communication between its members and partners or concerned stakeholders. EOTA respects privacy and takes care to secure personal data. Insofar, EOTA is complying with general data protection rules.

#### How we receive personal data?

In general, EOTA receives personal data through

- The users of the website [www.eota.eu](http://www.eota.eu)
- All persons which are in contact with EOTA and its members

#### Which personal data is collected?

In general, EOTA collects only work related **contact details** such as title, first name, name, work e-mail, telephone, organisation. This is to enable communication within the working groups.

In case of Members of EOTA Executive Board (ExBo) and General Assembly (GA) additionally ID information such as number of Identity Card, citizenship and birth date are collected. This is to comply with notifying tasks according to European Union or Belgian law.

In case of personal data of the EOTA employees additionally information is processed being necessary for complying with Belgian Employment law and with wage accounting rules.

Personal data received from third parties via queries to EOTA is collected and used exclusively to assist EOTA in responding to the query.

#### How personal data is stored?

The EOTA Secretariat keeps an archive of EOTA relevant documents and data on a server. Information related to the management of EOTA and the development of EAD and ETAs is shared. Shared information is stored in the EOTA Intranet.

#### How personal data is processed?

Only work related personal data are processed, and no information which is displayed in the EOTA In-house database is processed without the knowledge and prior consent of the concerned person.

Personal data is collected notably for the EAD development and the coordination of the concerned projects. Every new member informs the EOTA Secretariat ([info@eota.eu](mailto:info@eota.eu)) prior to their start of their work in EOTA about the relevant contacts to be notified for the different working groups.

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<sup>1</sup> Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation) - <https://eur-lex.europa.eu/legal-content/EN/TXT/?qid=1530627359538&uri=CELEX:32016R0679>

In this respect, persons committed in the EOTA work are aware that their personal data are shared in EOTA for the EOTA related work.

Shared information is accessible by EOTA members and authorised partners via a secured password.

EOTA Secretariat maintains a contact database which is shared internally in EOTA and insofar relevant for the coordination and information of different working groups or work areas. This database is accessible in the EOTA Intranet.

EOTA members and representatives in EOTA are obliged to inform without any delay the EOTA Secretariat about any modifications relevant for the continuation of the EOTA work.

EOTA Secretariat accepts modifications if authorised by the bodies' representatives. If personal data are processed from a person which is employed in a body to EOTA Secretariat and the EOTA representative of that body is in copy of a related request, EOTA accepts this modification request and does the necessary administrative tasks.

EOTA Secretariat regularly checks all those contacts notified by a member.

Sub-contractors, notably those which may have access to stored personal data such as IT service providers, have confirmed their GDPR compliance, insofar applicable.

Personal data stored on the server is only accessible by EOTA Secretariat.

Only the latest updates of personal data are shared in EOTA. In case a contact used is no longer valid and this fact has been notified by the responsible body to EOTA, the person which was adhered to this body will be deleted.

Personal data may be stored for longer periods for EOTA archiving purposes.

EOTA displays only the functional e-mail box [info@oeta.eu](mailto:info@oeta.eu) and the names of the employees of the EOTA Secretariat on its website.

Personal data in official documents held by EOTA for the performance of a task carried out in the public interest may be disclosed by EOTA Secretariat in accordance with European Union or Belgian law in order to reconcile public access to official documents with the right to the protection of personal data.

#### **Does EOTA keep and processes other personal data?**

EOTA may take **pictures** at events organised or co-organised by EOTA. By registering to this event EOTA asks to be authorised to use without restriction the photographs bearing a personal image in all type of publications or communication via the Internet. The registering person accepts that EOTA is released from any liability in connection with this.

EOTA checks **cookies** when persons are using the website [www.eota.eu](http://www.eota.eu) . Information is collected and stored exclusively in the EOTA Secretariat in order to assist EOTA in fulfilling the requests for information, and providing the publications a user needs. Visits to our site are tracked, so that we can assess which parts of our sites best serve our visitors, and better tailor our information to their needs. In this respect, EOTA may save the IP address of website users.

#### **What EOTA does not do?**

EOTA does not sell any of the information we receive.

### **Who is the responsible contact in EOTA for demonstrating compliance with the GDPR?**

EOTA Secretariat, Kunstlaan 40 Avenue des Arts, B-1040 Brussels (contact: [info@eota.eu](mailto:info@eota.eu)), and notably its Secretary General, is responsible for demonstrating compliance with the GDPR.

### **How does EOTA inform about its data protection policy?**

Information is provided on the website [www.eota.eu](http://www.eota.eu) and in the Intranet. Awareness raising within the organisation is secured through dashboards and mail dissemination of related information.