ETUI PRIVACY NOTICE FOR THE WEBSITE

ETUI’s privacy commitment

ETUI is located at Bd du Roil Albert II - 5, Brussels, Belgium and is responsible for the processing of your Personal Data, via its websites www.etui.org; www.worker-participation; ecdb.worker-participation.eu; www.ewcdb.eu; www.esddb.eu; www.ewctraining.eu.

The ETUI is committed to safeguarding the privacy of its website’s visitors as service users and this privacy policy describes how ETUI gathers and manages information from individuals by respecting the provisions laid in the General Data Protection Regulation. If you want to read the GDPR in your own language, you can do it here.

It is important to highlight that the GDPR is underpinned by the principles of: transparency, purpose limitation, data minimization, accuracy, storage limitation, integrity and confidentiality and accountability that we take care of throughout our work. Based on these principles, below we explain how our privacy policy works, the lawful basis for processing as well as the purposes of the processing.

What and how do we use information collected?

1) ETUI may use website visitor’s information [it may include IP address, geographical location, browser type and version, operating system, referral source, length of visit, page views and website navigation paths, timing, frequency and pattern of this website use]. We use Google analytics tracking system to get statistics that can help us to improve our services.

The legal basis for this processing is ETUI’s interest in monitoring and improving the its website and services. ETUI uses Google Analytics to analyse the use of our website. Google Analytics gathers information about website use by means of cookies. The information gathered relating to our website is used to create reports about the use of our website. Google’s privacy policy is available at: https://www.google.com/policies/privacy/.

ETUI uses cookies to help analysing the use and performance of the website and its services, to provide the users with more user-friendly information and services that would not be possible otherwise.

The data subject may, at any time, prevent the setting of cookies through the ETUI websites by clicking here, and may thus permanently deny the setting of cookies. Furthermore, already set cookies may be deleted at any time via an Internet browser or other software programs. This is possible in all popular Internet browsers. If the data subject deactivates the setting of cookies in the Internet browser used, not all functions of our website may be entirely usable.

For more information regarding the use of cookies, please refer to our Cookie Policy.

2) ETUI may process personal data related to the registration to our activities. We do this when we get your consent when subscribing to ETUI newsletters or events so we can organise them:

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• Contact information, such as your name, position in the organisation/institution, business address, telephone number, mobile phone number and email address;
• Payment data, necessary for processing payments and fraud prevention, including credit/debit card numbers, security code numbers and other related billing information;
• Further business information necessarily processed in a project or client contractual relationship with ETUI or voluntarily provided by you, such as instructions given, payments made, requests and projects;
• If legally required for compliance purposes, information about relevant and significant litigation or other legal proceedings against you or a third party related to you and interaction with you which may be relevant for antitrust purposes;
• Special categories of personal data. In connection with the registration for and provision of access to an event or training, we may ask for information about your special dietary requirements you may have. Any use of such information is based on your consent. If you do not provide any such information about special dietary requirements, we will not be able to take any respective precautions;
• Other personal data regarding your preferences where it is relevant to legal services that we provide; and/or
• Details of your participation in our events and trainings. It may include personal data about your membership of a professional or trade association or union, details of dietary preferences when relevant to events to which we invite you.

3) Additionally, ETUI will process data related to our education, training activities, documentation centre and membership of our networks (ECDB, EWCDB).

ETUI collects personal data for one or multiple of following non-limiting purposes:

<table>
<thead>
<tr>
<th>Purposes</th>
<th>Legal basis</th>
</tr>
</thead>
<tbody>
<tr>
<td>Proper technical functioning and personalisation of the Website;</td>
<td>Legitimate interests of ETUI</td>
</tr>
<tr>
<td>Protecting the security of and managing access to our premises, IT and communication systems, online platforms, websites and other systems, preventing and detecting security threats, fraud or other criminal or malicious activities</td>
<td>Legitimate interests of ETUI</td>
</tr>
<tr>
<td>Management of data subjects’ requests</td>
<td>Consent/Legitimate interests of ETUI</td>
</tr>
<tr>
<td>Managing and administering your or your organisation's relationship with ETUI</td>
<td>Consent/Legitimate interests of ETUI</td>
</tr>
<tr>
<td>Conducting statistical research and analytics;</td>
<td>Legitimate interests of ETUI</td>
</tr>
<tr>
<td>Performing payments;</td>
<td>Performance of an agreement/Legitimate interests of ETUI (finance/legal defence/rights)</td>
</tr>
<tr>
<td>Delivery of ETUI services, including without limitation, invoicing, customer relationship management;</td>
<td>Performance of an agreement/Legitimate interests of ETUI</td>
</tr>
<tr>
<td>Displaying content from external content providers;</td>
<td>Legitimate interests of ETUI</td>
</tr>
<tr>
<td>Sending a newsletter and/or advertisement, or otherwise contact you about services or information we think may interest you</td>
<td>Consent/Legitimate interests of ETUI</td>
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<tr>
<td>Compliance with our policies and standards and legal obligations (such as record keeping obligations), compliance screening or recording obligations towards donors and funding institutions, including reporting to and/or being audited by national and international regulatory bodies;</td>
<td>Performance of an agreement/Legitimate interests of ETUI or those of any third party recipients that receive your personal data, provided that such interests are not overridden by your interests or fundamental rights and freedoms</td>
</tr>
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</table>

**How do we store data?**

ETUI will take appropriate technical and organizational measures to keep your personal data confidential and secure in accordance with our internal procedures covering the storage, disclosure of and access to personal data. Personal data may be kept on ETUI personal data technology systems, in computer files and/or on paper with restricted access.

The data is stored in any case during the duration of the relevant agreements and for a period equal to the statutory period of limitation thereafter. In addition, personal data is kept for as long as required by law and no longer than necessary for the processing purposes described above.

**What data do we disclose with third parties?**

Personal data is only processed by ETUI for internal use for the above described purposes. We do not rent or sell your personal data to third parties for use for their own purposes. Within ETUI the data is passed on only to employees on a “need to know” basis.

ETUI shares data with third parties such as travel agency, trainers, etc., in order to carry out specific activities. We also may disclose information to government bodies, financial institutions insofar as reasonably necessary for the purposes of accountancy and auditing, as well as to the European Commission, or to comply with a legal requirement.

ETUI may disclose personal data to exercise or defence of legal claims, whether in court proceedings or in an administrative or out-of-court procedure.

**What international data transfers do we do?**

ETUI works within the European Economic Area (EEA) in some cases it makes use of processors based outside the European Economic Area (EEA) for the good functioning of its services. These processors are namely Microsoft, Google, Dropbox, Mailchimp, Mailpro. When transferring data outside the EEA we ensure to have the appropriate safeguards to protect personal data by means of contracts we put in place with those organisations.

**What are your individual's rights under GDPR?**

The GDPR lays down new individual rights and it's important that you know them:

(a) right to access;

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(b) right to rectification;
(c) right to erasure;
(d) right to restrict processing;
(e) right to object to processing;
(f) right to data portability;
(g) right to complain to a supervisory authority; and
(h) right to withdraw consent.

How can you exercise your rights under GDPR?

You have the right to know how ETUI uses, stores and deletes your personal data. You can exercise these rights by asking for a copy of the data and how it is used. You have the right to rectify it in case you think it is incomplete. Under certain circumstances, you have the right to object to the processing of your personal data.

ETUI aims at keeping personal data accurate. You have the right to have any inaccurate personal data about you rectified or completed, is you wish to correct your personal data, please contact us.

You may contact the Data Protection Officers at any time with questions and suggestions concerning data protection:

Aida Ponce Del Castillo

Our postal address:
Bd du Roil Albert II, 5
1210, Brussels, Belgium
Email: dataprivacy@etui.org

Are you aware of a data breach? You can report it

ETUI aims at having a robust data breach detection system. If you become aware of any breach, please fill this form and send it to:

ETUI - DPO
Bd du roi Albert II, 5, 1210, Brussels, Belgium
Or by Email: dataprivacy@etui.org

ETUI is in the obligation of reporting a data breach to the supervisory Authority in less than 72hrs: https://www.autoriteprotectiondonnees.be/la-notification-de-fuites-de-donn%C3%A9es

ETUI is continuously working on data privacy

ETUI may update this policy, we invite you to have a look at the new versions on a regular basis. The current version is dated 2019

End

November 20th, 2019