

## **Privacy policy for ETUI.ORG**

The **ETUI website** have been developed by the ETUI (Boulevard du Roi Albert II, 5; box 4; B - 1210 Brussels, Belgium).

We understand that you are aware of and care about your own personal privacy interests, and we take that seriously. This Privacy Policy describes ETUI's policies and practices regarding the collection and use of your personal data, and describes your privacy rights. We recognize that information privacy is an ongoing responsibility.

### **1. When does this privacy policy apply?**

This privacy policy applies to the processing of your personal data in the context of the ETUI website visit and services.

### **2. Who is responsible for the processing of your personal data?**

The ETUI is responsible for the processing of your personal data. This means that the ETUI determines for what purposes and with what means your personal data will be processed.

The ETUI has appointed an internal officer who will be your point of contact for any questions regarding the processing of your personal data. The contact details are: [dataprivacy@etui.org](mailto:dataprivacy@etui.org)

### **3. Which personal data do we process about you?**

We collect your personal data in two ways:

- a) Enrolment, information provided by you:
  - full name;
  - e-mail address;
  - approximate age;
  - gender;
  - location;
  - level of educational attainment;
  - reason for your interest in the ETUI course;
  - goals for doing the ETUI course;
  - affiliation to any trade union;

- name and type of any other organisation that may have encouraged you to register for the ETUI course;
- views about the ETUI course

#### **4. What is the legal ground for processing your personal data?**

In general, the ETUI processes your personal data for various purposes, which are further explained below. Regarding the processing of your personal data, the ETUI relies on:

The processing is necessary for the services you have asked us to provide: in this case providing services related to: registration to presential or online events, registration to education training courses; registration to databases.

**Your consent:** In some cases (e.g. in case of personalised information) we will ask your explicit consent. You have the right to withdraw your consent for the future at all times. Your consent can be expressed e.g. by:

- filling out the registration forms
- ticking a box to receive newsletters, information or registration to future events
- filling the registration forms of the databases that you would like to consult via
- another positive action from which your consent is inferred, e.g. by choosing to contact us via email.
- when the online event needs to be recorded. (IF an events needs to be recorded, all participants are informed about this well in advance).
- If for the processing of special data (such as trade union membership) is required, we rely in addition on your explicit consent in the enrolments forms you sign. You have the right to withdraw your consent for the future at all times.

Users of the ETUI website, may interact with several different systems, including:

- CiviCRM Constituent Relationship Management system;
- booking systems and forms; Moodle Workplace Learning Management System;
- Google's YouTube service;
- Google Workspace applications;

- Google's Analytics service;
- a Drupal website hosted on behalf of ETUI;

## **5. For which purposes do we process your personal data?**

The ETUI processes your personal data for the following purposes:

- To send confirmation and updates concerning the online events or webinars, before and after they take place.
- To manage our subscriptions to newsletter, magazine or journals.
- Personally Identifiable Information (PII) that is any data that could potentially be used to identify a particular person, may be used for research or to improve our communication purposes. The processing of this data is necessary to provide you with an effective online event as part of services.
- To provide online education services and send you communications including certificates related to the online course you enrolled to.
- To answer your questions or requests (for example when you request more information) by email, in which case this will only ever be for course-specific purposes. For this purposes, we can process data such as your name, your email address, your country of residence, language. These data are processed on the basis of the ETUI's legitimate interest to handle your questions and requests in the best possible way and to communicate with you.
- To provide you with support for your participation in the ETUI online events or training courses;
- To enable us to assess the impact of the ETUI website or services to which you are registered to, in which case we will only use your personal information in anonymised and aggregated form, unless you have given us express permission in writing to use your personal information in a way that identifies you (for example for publicity purposes);
- When applicable, to communicate to the contact details of all those participants who want to share contact details, subject to each one's explicit consent.
- To enable us to improve the quality of the current and any future versions of the ETUI website, and the website and other services that support the course, in which case we will only ever use your personal information in anonymised and aggregated form.

- For the technical and functional management of our website. We process personal data obtained through cookies and other technologies for the technical and functional management of our website, ensure that the website are easy to use. By using your data, we can check how our website is used and we can improve its content. These data also allow us to adequately secure our website. For this purpose, we can process data such as your IP address, the pages you visit, the browser you use, the websites you visited earlier, geographical data such as your location, your preferred language and the time and duration of your visit.
- The monitoring data collected includes browser type, domain names, traffic volumes, temporal data, IP information and data posted from webforms. We reserve the right to analyse this information from time to time.

The processing of these data is based on the ETUI's legitimate interest in providing a well-functioning and secure website and in providing content relevant to you. You have the right to withdraw your consent at any time (see point 10).

You can find more information about how we use cookies in our Cookie Policy.

## **6. Who has access to your personal data?**

The ETUI is selective in the parties to whom it discloses your personal data and chooses them carefully. In all cases, we will ensure that sufficient safeguards for the protection and confidentiality of your data are in place.

## **7. Does the ETUI process your data outside the European Economic Area ("EEA")?**

In principle your personal data will not be transferred to sub-processors located outside the European Economic Area. In the rare event that this would be the case, the ETUI is committed to ensuring an adequate and sufficient level of protection for your data, in particular by making sure that we can rely on a an adequacy decision under Article 45 of General Data Protection Regulation ("GDPR"), by concluding standard contractual clauses under Article 46.2 GDPR or via any other appropriate safeguards as provided for by Chapter V GDPR.

If you have any questions or would like more information about the possible transfer of your personal data outside the EEA, you can send a dated and signed request to the ETUI by email. You can find our contact details below.

## **8. How are your personal data protected?**

The ETUI strives to protect your personal data as good as possible by means of administrative, technical and organisational measures. To this end, the ETUI has developed several technical and security measures, as well as administrative procedures which are implemented by our staff.

The ETUI has committed to ensure that the service providers that process personal data also implement sufficient technical and organisational measures. We do not sell personal information to anyone and only share it with third parties who are facilitating the delivery of ETUI services.

## **9. How long do we keep your personal data?**

The ETUI will retain your personal data in maximum 24 months after users' last login to the ETUI course website, to delete all personal information provided by each such user from the ETUI learning management system, as well as data relating to each such user's progress in the course. At the same time, we archive a copy of the same information having first anonymised it by the removal of names and email address from the data. At any time, you may ask us to delete from the ETUI online course website all the data relating to your progress in the course, in which case your data will no longer be available for us to anonymise and then archive.

## **10. What are your rights and how can you exercise them?**

Under the GDPR, you have a number of rights with regard to your personal data. Some of these rights have a very specific scope or are subject to special conditions or exceptions.

### **10.1 Right of access**

This means for example that you can ask us whether we process your personal data and for what purposes we do this. For more information, please consult Article 15 GDPR.

### **10.2 Right to rectification**

You also have a right to obtain the rectification of inaccurate personal data. For more information, please consult Article 16 GDPR.

### **10.3 Right to erasure**

In some cases, you can request us to erase your personal data for example when personal data is no longer required for the purposes for which we have collected it, when the personal data is processed based upon your consent and you withdraw your consent, etc. In some exceptional cases, the ETUI is not obliged to grant your request to erase your personal data. For more information, please consult Article 17 GDPR.

### **10.4 Right to restriction of processing**

You may request a restriction of your personal data for example if you dispute the accuracy of your personal data, if the processing activity is unlawful, etc. A restriction of the processing means that we may only store your data temporarily, except in case you nevertheless consent to the processing of your data, in the context of legal proceedings or in the public interest. A restriction can be terminated afterwards. For more information, please consult Article 18 GDPR.

### **10.5 Right to data portability**

If we process your personal data based upon your consent you can ask us to transfer your data to yourself or to another controller (if this is technically possible). In exceptional cases, the ETUI is not obliged to follow up on your request. For more information, please consult Article 20 GDPR.

### **10.6 Right to object**

You can inform us of the particular reasons why you wish to object to the particular processing activity based upon the ETUI's legitimate interest. If these particular reasons outweigh our legitimate interests, we will terminate the processing activity. The ETUI cannot follow up on your request when we process your personal data for the purposes of a legal claim. For more information, please consult Article 21 GDPR.

### **10.7 Right to object to the processing of your personal data for direct marketing purposes**

If we process your personal data for direct marketing purposes, you can always request us to stop processing your personal data without you having to give up a special reason. This right includes the right to object to profiling to the extent that the profiling is related to such direct marketing. For more information, please consult Article 21 GDPR.

### **10.8 Right not to be subject to profiling**

The ETUI can process personal data for profiling purposes as explained in point 5 of this Privacy Policy. The ETUI is not using your data for direct marketing purposes and you have the right to object to profiling for our direct marketing at any time, without you having to give up a special reason (as explained in point 10.). For more information, please consult Article 21 GDPR.

### **10.9 Right to withdraw your consent at any time**

If the processing of your data is based on your consent, you also have the right to withdraw your consent at any time, without this affecting the legitimacy of the processing done prior to the withdrawal of your consent.

### **10.10 Exercising the aforementioned rights**

Exercising the abovementioned rights can easily be done in different ways, such as by email or by mail. For privacy and safety reasons, we may request proof of your identity. You can find our contact details in point 13.

### **10.11 Competent supervisory authority**

In accordance with Article 77 GDPR, you have the right to lodge a complaint with the supervisory authority of your habitual residence, your place of work or the place of an alleged infringement of the GDPR. The Belgian Data Protection Authority is the supervisory authority for the headquarters of the ETUI located in Belgium.

In case of queries please email [etui@etui.org](mailto:etui@etui.org)

Any legal dispute concerning this privacy policy will be dealt with under the law of Belgium.