

# Privacy Policy of ERYICA a.s.b.l.

Effective since 24 May 2018

The European Youth Information and Counselling Agency a.s.b.l. (hereinafter abbreviated as "ERYICA") ensures your privacy in accordance with the provisions of the General Data Protection Regulation (GDPR) 2016/679 of 27 April 2016 concerning the protection of natural persons in relation to the processing of personal data and regarding the free movement of this data.

In the text below, we explain how ERYICA processes and uses your data.

### 1. WHO IS RESPONSIBLE FOR PROCESSING YOUR DATA?

ERYICA is responsible for processing your personal data.

Our contact information is: ERYICA a.s.b.l. 87 route de Thionville 2611 Luxembourg secretariat@eryica.org

If you have any questions after reading our privacy statement, or want to contact us, please use the contact details above.

### 2. WHAT INFORMATION DO WE COLLECT AND WHY?

### **ERYICA Newsletter and press releases**

When you sign up to our newsletter, we **only** store your email address, which is not personal data as long as there is no name or other information attached to it. We use this data to provide you with news on youth information, youth work, youth policy and trends and innovation in the field of youth. Your email address is stored safely by a third party, Mailchimp, which handles our mailings. To protect your data, ERYICA has a processor agreement with the specialist company Mailchimp, in which the safety of your data is contractually guaranteed on the basis of the model clauses approved by the European Commission.

We only send you ERYICA newsletters and press releases via Mailchimp if you have explicitly given us permission to do so as you voluntarily subscribed to this mailing list, either on our present platform or the previous one. In any case you can withdraw this at any time.

We may keep an eye on which emails we send you and we can check whether you open them, but we cannot relate this information to any individual as we only hold your email address. In this way we can be certain that we are sending you relevant information.



### **Registration forms**

When you apply or register for an event, the information we collect varies according to the purpose of the form you fill in. It may include:

- Name:
- Email address (to contact you);
- Office address (for invoicing and to prove ERYICA Membership);
- Home address (for invoicing and to prove ERYICA Membership);
- Professional telephone numbers (to contact you);
- Date of birth (for project administration and reporting, and to verify your eligibility e.g. for the Youth Ambassador training);
- Language knowledge (for participation in an event in a foreign language);
- Gender (for booking accommodation, training certification and drafting contracts);
- Bank account data (for costs reimbursement);
- Occupation (to assess professional experience);
- Special requests and preferences, which may include:
  - o Dietary preferences or requirements; and
  - o Other information that may be required to provide you with an appropriate service, e.g. special needs.

We do not collect special categories of data, such as data related to health, ethnic origin, religious or political views, sexual orientation, etc.

Your data is stored safely by a third party, Google Inc., which handles most types of our online communication through G Suite. To protect your data, Google Inc. is fully compliant with the legal regulations in place concerning data protection.

#### **Applications and Recruitment**

ERYICA will keep the files of your application for one year after the advertised position has been filled. If you get selected for the position, your data will be kept as long as and to the extent that the legal regulations of Luxembourg require it.

ERYICA can send you emails regarding the current and future recruitment in this time frame. We send these emails in line with the consent you give us when applying and for the sake of offering you more opportunities.

## **Social Media**

We use social media to communicate about our events and ERYICA news in general. Sometimes we will reply to comments addressed to ERYICA or to private messages. You might also see non-commercial advertisements from ERYICA on social media, based on your interests.



### 3. WHY DO WE COLLECT YOUR DATA?

We collect your data mainly to provide you our services, manage projects, organise events, send our newsletter and press releases, improve our service and, more generally, to easily communicate with each other. We also collect your data to fulfil our tasks and services, such as event and training organisation, certification and managing your membership. Finally, your data also allows us to improve and facilitate your navigation on our website.

### 4. HOW DO WE COLLECT YOUR DATA?

Most of your data is communicated to us by your active intervention. Other data, such as the date and time of your access to our website, the pages you have viewed, or your location data, are collected automatically through servers consulted and "cookies" placed on our website. For more information on cookies, consult our *Cookie Notice*.

#### 5. WHO DO WE SHARE YOUR DATA WITH?

When you submit your personal data to ERYICA, they are securely passed on to Google Inc., Mailchimp and/or Squarespace. This processing is done in the scope of the fulfilment of a contract and is required in order to accomplish the activity in question.

Your data are securely stored with Google Inc. (G Suite), Dropbox Professional, Mailchimp and/or Squarespace. We only transfer your data to a non-EU country if it provides a level of protection equivalent to what you can find in your country of residence.

We can also share your personal data with third parties if you give us your permission to do so. We will always ask for your consent in advance. These parties depend on the case and may include hotels, event venues, restaurants, project partners, ERYICA Members and stakeholders. You have the right to withdraw this permission at any time, without detracting from the legitimacy of the processing. For the modalities of exercising this right, see point 8.

These third parties (processors) use this data for arranging the events and services in question. These do not necessarily take place in the premises of ERYICA. We make appropriate arrangements with these processors to safeguard the security of your personal data. We never give your personal data to other third parties without your prior permission. Furthermore, we will not pass data provided by you to others if this is legally not permitted.

Our staff and governing bodies may have access to your data only to the extent necessary for processing your request and/or for fulfilling the objectives pursued. Each of them is subject to a strict obligation of confidentiality.



### 6. HOW DO WE KEEP YOUR DATA SECURE?

We consider it to be of great importance that your personal data is properly protected. We maintain a strict privacy policy and take all appropriate measures to ensure, to the extent possible, any unauthorized leak, destruction, loss, disclosure, use, access or modification of your data. For this reason we have taken the necessary technical and organisational measures to adequately protect your personal data. No one method of sending over the Internet or electronic storage is completely secure, so ERYICA cannot guarantee absolute security.

### 7. HOW LONG DO WE STORE YOUR DATA?

We will keep your information to accomplish the objectives pursued and for as long as it is reasonably necessary. It will depend on factors such as the duration of projects, recruitment processes and archiving obligations. We will also retain your information as necessary to comply with legal, accounting or reporting requirements. Once this goal is achieved, we either delete or anonymise your data.

#### 8. WHAT ARE YOUR RIGHTS AND HOW CAN THEY BE EXERCISED?

As a user, you also have a number of rights relating to your personal data. You may, at any time, request to verify, access, rectify, delete, transfer and object to the use of your data, as well as request the limitation of such use of your data. To do so, simply send us an email at the following address: <a href="mailto:secretariat@eryica.org">secretariat@eryica.org</a>. We will respond to this as quickly as possible and within 30 days at most.

<u>Right of access and correction/rectification:</u> you have the right to access all the personal data we collect about you. You can have any incorrect or incomplete data change or removed.

<u>Right to be forgotten (right to erasure)</u>: you are entitled to have your details deleted from our database unless the data is required for the fulfilment of a contract or to comply with a legal or training certification requirements.

<u>Right to make a complaint:</u> if you believe that we have illegally processed your data, you have the right to make a complaint to the National Commission for Data Protection (<u>www.cnpd.lu</u>, *Data Protection Authority*).

<u>Right to withdraw permission:</u> any user or visitor whose personal data is collected has the right at any time to withdraw permission given in the past to process this personal data.

Right to appeal: you always have the right to appeal against the processing of your personal data if this is done without your permission, and when the processing does not



have to be carried out on a different basis, such as the fulfilment of a contract or compliance with legal requirements.

Right to restrict processing: you have the right to (temporarily) halt the processing of your personal data.

<u>Right to transfer data:</u> under certain conditions, you have the right to obtain your personal data from us in a structured, accessible and digitally readable form and to transfer this data to another processor.

#### 9. WEBSITE

Whilst ERYICA has taken reasonable steps to ensure that the data shown on our website <a href="www.eryica.org">www.eryica.org</a> is correct and accurate, it does not accept any responsibility for errors made. ERYICA cannot be held responsible for any inaccuracies of other information that may be accessed from its own site pages through any hypertext links. The information content is believed to be correct at the time of publication. In no event shall ERYICA be liable for any loss, disruption, indirect or consequential damages or any damages whatsoever, arising out of or in connection with the use of this website or the interpretation of information held on or obtained from this website.

#### 10. WHAT IS OUR POLICY ON DATA CONCERNING MINORS?

Our services and website are not targeted to minors. If you learn that your minor child has provided us with their personal data without your consent, contact us at the following address: <a href="mailto:secretariat@eryica.org">secretariat@eryica.org</a>.

#### 11. CHANGES TO THIS PRIVACY POLICY

ERYICA will in some cases update this privacy policy on the basis of a change in services, customer feedback, or changes to privacy legislation.

ERYICA will always inform you, via our website or our usual communication channels, of any intrinsic change to a processing activity. If required by privacy legislation, we will ask for your permission for any updated or new processing activities.

You may also review the Privacy Policy by visiting our website www.eryica.org.