

# belta Privacy Policy

We respect your privacy. We are committed to protecting your personal information and to being transparent about the information we hold about you. This privacy policy explains how we keep your personal information safe, tells you about your privacy rights and how the law protects you.

## Purpose of this privacy notice

This notice explains what information we collect about you, how we use it and how long we will keep it for. You might give us your personal information when you join the association, request a service, sign up to an event, or even simply by using our website.

When we collect your personal details, there is always a reason behind it. In addition, we will only ask you for sensitive personal data when there is a clear reason for doing so and we will tell you what that reason is.

It is important that you read this privacy notice so that you fully understand how and why we are using your personal information. On specific occasions, we may provide you with complementary privacy notices or fair processing notices. We will make it clear when you need to be aware of this, as this privacy notice supplements the other notices and is not intended to override them.

## Controller

BELTA, a company registered in Belgium and registered as a charity (No 508 461 330), is the controller and responsible for your personal information. If you have any questions about this privacy policy, including any requests to exercise your legal rights, please [get in touch with us](#).

## The information we collect about you

'Personal information' means any information about an individual from which they can be identified. The personal information we collect allows us to provide services to our members and users of our services. It also helps us to better understand our members and service users.

We strongly believe your personal information needs to be safeguarded and protected. As long as you share it with us, we are its guardian. We take steps to collect only what is necessary and we do this for different purposes, but all with one goal in mind: to provide members and service users with a professional service. Here is a list of the type of personal information we currently use:

- **Identity Information you give to us** – this will include your full name and title, postal address and email address.
- **Work / Professional Details** including your institution name and your primary/secondary function.
- **Transaction History** of your interactions with us. This will include any membership details, events you have participated in, donations, feedback and survey responses.
- **Technical Information** we can confirm what browser you are using, the internet protocol (IP) address and computer operating systems that are being used, your login data and other technology on the devices you use to access our various online forms.
- **Marketing and Communications Preferences** for receiving information from us about our services, membership updates, volunteering and fundraising activities (including ways to donate) and how you would like us to communicate with you.

We also collect and analyse statistical or demographic information, which is known as 'Aggregated Data'. This information does not directly or indirectly reveal your identity and therefore by law, it is not offered the same protection as your personal information. For example, we may aggregate information about our website usage to calculate how many people are accessing a specific website page, so we can see where improvements need to be made.

Data protection law recognises that certain categories of personal information are more sensitive, such as details about health, race, religious beliefs and political opinions. These are known as **Special Categories of Personal Data**. We do not usually collect such information unless there is a clear reason for doing so.

## If you don't want to share your personal information with us

If you don't want to share your personal information with us, you don't have to. We will only keep any personal information we are required to keep in accordance with legal requirements or tax and accounting rules or to provide you with the members services offered to you when you joined BELTA, but we will otherwise respect your decision. However, please be aware that this means that we may have to stop providing you with some of our support services.

## Your duty to inform us of changes

It is important to us that the personal information we hold about you is accurate and up-to-date. For members, we normally check this each year when you complete your membership form. Please tell us if there are any changes during your relationship with us. You can do this easily by visiting the member portal on our website, or by [getting in touch with us](#).

## How is your personal information collected?

We collect personal information from and about you through:

- Direct interactions. You may give us certain information (e.g. your Identity Information, Contact Details) by filling in forms (in person or via our website) or by corresponding with us by post, phone, email or otherwise. This includes personal information you provide when you:
  - join BELTA as a member
  - sign up for an event
  - apply for a travel grant
  - submit a proposal e.g. as a conference speaker or to present a webinar
  - make a donation to us
  - subscribe to our services or publications
  - request marketing to be sent to you
  - engage with us on social media or message boards
  - enter a competition, promotion or survey
  - give us feedback on our work

## The legal bases which allow us to use your personal information

The legal basis that we rely on for using your personal information will depend upon the circumstances in which we collect and use it, but will in most cases be because:

- you have provided your consent to allow us to use your personal information in a certain way;
- it's necessary to carry out for the performance of a contract with you;
- it's necessary in order for us to comply with a legal obligation; or
- It's in our legitimate interests to do so. This means the interest of our organisation in conducting and managing our affairs to enable us to give you the best support and services and the best and most secure experiences. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal information for our legitimate interests. We do not use your personal information for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or

permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you by [getting in touch with us](#),

## How we use your personal information

We will use your personal information only when the law allows and we have taken steps to ensure we respect your privacy. We will never sell or pass on your details to other organisations for their own marketing purposes.

Here are the main reasons why we need to use your personal information:

### When we provide a service to you

If you join IATEFL, or engage with our services, we use your personal information to:

- provide you with the membership services and benefits we provide to our members as part of their package
- enable you to attend an event you have registered for
- communicate with you when you apply for funding such as a Travel Grant
- comply with our legal obligations such as our safeguarding duty where we have concern about your welfare
- provide you with information about how you can get involved through volunteering, donating or fundraising for us.

We will not use your personal information to send you information about our services or fundraising activities if you have indicated that you do not wish to be contacted by us for such purposes. However, we might retain your details on a suppression list to help ensure that we do not continue to contact you for these purposes.

### When you provide a service to us

If you are a member, volunteer, donor, sponsor, exhibitor or supporter, we use your personal information to:

- receive and process your donations;
- manage the relationship with us when you support us as a volunteer or sponsor;
- manage our relationship with philanthropy givers and trust organisations;
- manage our relationship with exhibitors, as well as to process invoices and make payments;
- manage our relationship with suppliers, as well as to process invoices and make payments;
- manage events, competitions or surveys you take part in and provide you with relevant updates;
- provide you with information about how you can get involved through volunteering, donating or fundraising for us. We only give you the information you have asked for and we only contact you with this information by email, post or telephone if you have given us your consent. You can update your communication preferences at any time or tell us to stop giving you the information, by [contacting us](#).

We will not use your personal information to send you information about our services or fundraising activities if you have indicated that you do not wish to be contacted by us for such purposes. However, we will retain your details on a suppression list to help ensure that we do not continue to contact you for these purposes.

### Change of purpose

We will use your personal information only for the purposes for which we collected it. If we plan to use your details for reasons that are compatible with the original purpose, we will assess if this is reasonable and proceed only if it does not negatively impact your interests and fundamental rights. For example, you might be interested in new service developments, changes to your membership or to the



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association, or information about new volunteering opportunities. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please [contact us](#). Please note that we will only process your personal information without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

## Recipients of your personal information

Rest assured, we take steps to keep your personal information safe, and we will never share, sell or swap your personal information with any third parties for the purposes of their own marketing or monetising of your data.

However, if you have received a service, donated to us or provided us with your contact details in any other circumstances, we will share your personal information with the parties described below.

- Professional advisers acting as processors including lawyers, bankers, auditors and insurers based in the EEA who provide consultancy, banking, legal, insurance and accounting services.
- Venues who provide accommodation or event locations.
- Communications providers who support us including postal and mailing companies, online mailing organisations (for example, MailChimps), online polling (for example, Formsite) and survey service providers (for example, TypeForm).

All the data we collect and store is kept in a secure, limited-access cloud service (for example, Google Drive) and only viewed by the necessary parties in BELTA. They do not download or keep your data for any reasons on a personal computer or server; access to the data is limited and passwords are changed regularly to protect the data.

We require all third parties to respect the security of your personal information and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal information for their own purposes and only permit them to process your personal information for specified purposes and in accordance with our instructions.

## Information security

We have put in place appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal information on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

## How long will you use my personal information for?

Only for as long as necessary to fulfil the purposes for which we collected it, including for satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for personal information, we consider the amount, nature, and sensitivity of the information; the potential risk of harm from its unauthorised use or

disclosure; the purposes for which we process it and whether we can achieve those purposes through other means; and the applicable legal requirements.

We keep basic information about you (including Identity, Contact, Financial and Transaction Information) for six years after you cease engaging with us.

In some circumstances you can ask us to delete your personal information: see Request erasure\_below for further information.

In some circumstances we may anonymise your personal information (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

## Your legal rights

Under certain circumstances, you have rights under data protection laws in relation to your personal information.

You have the right to:

- request access to your personal information and receive a copy as well as check we are processing it lawfully.
- request correction of any incomplete or inaccurate information we hold about you. However, we may need to verify the accuracy of the new data you provide to us.
- request erasure of your personal information where there is no longer a good reason for us to hold it.
- This may also apply where you have successfully exercised your right to 'object to processing' (see below); where we may have processed your information unlawfully; or where we are required to erase your personal data to comply with local law. Please note however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.
- object to processing of your personal information where we are relying on a legitimate interest (or those of a third party). This applies where there is something about your particular situation which makes you want to object to as you feel it impacts on your fundamental rights and freedoms. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.
- request a restriction on processing of your personal information. This applies in the following scenarios:
  - if you want us to establish the accuracy of your information; (b) where our use of it is unlawful but you do not want us to erase it; (c) where you need us to hold the information, even if we no longer require it, to enable you to establish, exercise or defend legal claims; or (d) you have objected to our use of your information but we need to verify whether we have overriding legitimate grounds to do so
- withdraw consent at any time where we are relying on consent to process your personal information. However, this will not affect the lawfulness of processing carried out prior to this withdrawal. If you do withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent

### **How to exercise your rights**

If you wish to exercise any of the rights set out above, please [contact us](#).

You have the right to make a complaint at any time to the (who) authority for data protection issues. We would, however, appreciate the chance to deal with your concerns before you approach the (who) so please do [contact us](#) in the first instance.



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### **No fee usually required**

There is no fee to access your personal information (or to exercise any of your other legal rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

### **What we may need from you**

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal information (or to exercise any of your other rights). This is a security measure to safeguard your personal information. We may also contact you to ask for further information in relation to your request to speed up our response.

### **Time limit to respond**

We try to respond to all legitimate requests within one month. Occasionally it may take us longer if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

## **Key details**

Our full details are:

- Full name of legal entity: (complete name on papers)
- Email address: [beltabelgium@gmail.com](mailto:beltabelgium@gmail.com)
- Postal address: BELTA, Jan Van Ophemstraat 9, Aarschot 3200 Belgium
- Telephone number: (do we need?)

## **Website Third-Party Links**

When using our website, there may be links to third-party websites, plug-ins and applications. Clicking on those links may allow third parties to collect or share information about you. We do not control these third-party websites, plug-ins or applications, and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy notice of every website you visit.

## **Changes to this Privacy Notice**

This Privacy Notice was last updated on 02 June 2018 and will be reviewed and updated from time to time.

Data protection law in the EU has changed on 25 May 2018. Although this privacy notice sets out most of your rights under the new laws, we may not be able to respond to some of your requests (for example, a request for the transfer of your personal information) until after 30 June 2018, as we are still working towards getting our systems ready for some of these changes.