

## **Fire Safe Europe (FSEU)**

### **Data Privacy Policy and Cookie Policy**

**June 2018**

#### **Background:**

FSEU understands that your privacy is important to you and that you care about how your information is used and shared online. We respect and value the privacy of everyone who visits our site or participate to one of our activities (Newsletter, press release, Workshops, meetings, ....). We will only collect and use information in ways that are useful to you and in a manner consistent with your rights and our obligations under the law.

These Policies apply to our use of any and all data collected by us in relation to your use of our Site or other activities such as emailing's and events. Please read these policies carefully and ensure that you understand it. Your acceptance of Our Privacy Policy is deemed to occur upon your first use of Our Site or when registering to one of our activities. Our Retention Policy governs our overall data management.

#### **PRIVACY POLICY AND COOKIE POLICY**

##### **1. Definitions and Interpretation**

In this Policy the following terms shall have the following meanings:

<b>“Cookie”</b>	means a small text file placed on your computer or device by our Site when you visit certain parts of our Site and/or when you use certain features of our Site. Details of the Cookies used by our Site are set out in section 11, below;
<b>“Our Site”</b>	means this website, <a href="https://firesafeeurope.eu">https://firesafeeurope.eu</a>
<b>“Our Activities”</b>	means our emailing like newsletter, press release, our events (workshops, meetings, ...) where pictures and videos are taken for communications purposes
<b>“Belgian and EU Cookie Law”</b>	means the relevant parts of the GDPR and the Act of 8 December 1992 (hereafter "the Privacy Act" – published in the Belgian Official Journal of 18 March 1993), amended in 1998 (Belgian Official Journal of 3 February 2001)/ in 2006 (Belgian Official Journal of 26 June 2003).

## “We/Us/Our”

means **FSEU**, a non-profit AISBL registered in Belgium under AISBL The Alliance for a Fire Safe Europe – BE 0840.211.030 with registered address is Rue Mercelis, 57, B - 1000 Brussels.

## 2. Information About Us

- 2.1 Our Site, <https://firesafeeurope.eu>, is owned and operated by FSEU aisbl, non-profit organisation with registered address is Rue Mercelis, 57, B - 1000 Brussels. Our VAT number is BE 0840.211.030.
- 2.2 Webmaster: Lauroscope
- 2.3 Our data protection officer is Juliette Albiac who can be contacted at [juliette.albiac@firesafeeurope.eu](mailto:juliette.albiac@firesafeeurope.eu)
- 2.4 We are regulated by the Commission on the Protection of Privacy in Belgium (<https://www.privacycommission.be/>)

## 3. Scope – What Does This Policy Cover?

This privacy policy applies to your use of our site and when participating to our activities (workshops, meetings, ...). It does not extend to any websites that are linked to from our site (whether we provide those links or whether they are shared by other users). We have no control over how your data is collected, stored or used by other websites and we advise you to check the privacy policies of any such websites before providing any data to them.

## 4. What Data Do We Collect?

Some data will be collected automatically by our site (for further details, please see section 11), other data will only be collected if you voluntarily submit it and consent to us using it for the purposes set out in section 5. Depending upon your use of our site and through event registration, we may collect some or all of the following data:

- 4.1 Name;
- 4.2 business/company name
- 4.3 job title;
- 4.4 contact information such as email addresses and telephone numbers;
- 4.5 specific topics of interest
- 4.6 [IP address (automatically collected);]
- 4.7 [web browser type and version (automatically collected);]
- 4.8 [operating system (automatically collected);]

## 5. How Do We Use Your Data?

- 5.1 All personal data is stored securely in accordance with the EU General Data Protection Regulation (Regulation (EU) 2016/679) (GDPR). For more details on security see section 6, below.
- 5.2 We use your data to provide the best possible services to you. This includes:
  - 5.2.1 Supplying our services to you;
  - 5.2.2 Personalising and tailoring services for you;
  - 5.2.3 Responding to communications from you;
  - 5.2.4 Supplying you with emails e.g. newsletters, alerts, invitation etc. that you have subscribed to (you may unsubscribe or opt-out at any time);
  - 5.2.5 Communications actions on our activities
  - 5.2.6 Ability to organise event logistics in a professional way
  - 5.2.7 Market research;
  - 5.2.8 Analysing your use of our site and gathering feedback to enable us to continually improve our site and your user experience;
- 5.3 In some cases, the collection of data may be a statutory or contractual requirement, and we will be limited in the products and services we can provide you without your consent for us to be able to use such data.
- 5.4 We will not send you any unsolicited marketing or spam and will take all reasonable steps to ensure that we fully protect your rights and comply with our obligations under the GDPR and the Act of 8 December 1992 (hereafter "the Privacy Act" – published in the Belgian Official Journal of 18 March 1993), amended in 1998 (Belgian Official Journal of 3 February 2001)/ in 2006 (Belgian Official Journal of 26 June 2003).
- 5.5 We do not use advertised content on our site.
- 5.6 Under GDPR we will ensure that your personal data is processed lawfully, fairly, and transparently, without adversely affecting your rights. We will only process your personal data if at least one of the following basis applies:
  - a) you have given consent to the processing of your personal data for one or more specific purposes;
  - b) processing is necessary for the performance of a contract to which you are a party or in order to take steps at the request of you prior to entering into a contract;
  - c) processing is necessary for compliance with a legal obligation to which we are subject;
  - d) processing is necessary to protect the vital interests of you or of another natural person;
  - e) processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller

## 6. How and Where Do We Store Your Data?

- 6.1 We only keep your data for as long as we need to in order to use it as described above in section 5, and / or for as long as we have your permission to keep it and need them for the standard activities of the association and / or fulfill legal requirements. Your data will be deleted if we no longer need it in accordance with the terms of our Data Retention Policy (see below: point 4. b, 11 timely processing).
- 6.2 Your data will only be stored within the European Economic Area (“the EEA”). Data security is of great importance to us, and to protect your data we have put in place suitable physical, electronic and managerial procedures to safeguard and secure data collected through our site.
- 6.3 We secure and protect your data with due diligence:
  - 6.3.1 All IT systems are protected against unauthorised access.
  - 6.3.2 All IT systems are used only in compliance with relevant company policies.
  - 6.3.3 All data stored on IT systems are managed securely in compliance with all relevant parts of the GDPR and all other laws governing data protection whether now or in the future in force.
- 6.4 Notwithstanding the security measures that we take, it is important to remember that the transmission of data via the internet may not be completely secure and that you are advised to take suitable precautions when transmitting to us data via the internet.

## 7. Do We Share Your Data?

- 7.1 We do not share your data with other companies members of our association.
- 7.2 We may contract with third parties to supply products and services to you on our behalf. These may include payment processing, search engine facilities, advertising and marketing. In some cases, the third parties may require access to some or all of your data. Where any of your data is required for such a purpose, we will take all reasonable steps to ensure that your data will be handled safely, securely, and in accordance with your rights, our obligations, and the obligations of the third party under the law.
- 7.3 We may compile statistics about the use of our site or the participation level at events including data on traffic, usage patterns, user numbers, sales and other information (opening rate, conversion...). All such data will be anonymised and will not include any personally identifying information. We may from time to time share such data with third parties such as prospective investors, affiliates, and partners. Data will only be shared and used within the bounds of the law.
- 7.4 Under certain circumstances we may be legally required to share certain data held by us, which may include your personal information, for example, where we are involved in legal proceedings, where we are complying with the requirements of legislation, a court order, or a governmental authority. We do not require any further consent from you in order to share your data in such circumstances and will comply as required with any legally binding request that is made of us.

## 8. How Can You Control Your Data?

When you submit information via our site or a registration form, you may be given options to restrict our use of your data. We aim to give you strong controls on our

use of your data (including the ability to opt-out – unsubscribe link available in the footer of our emails or contacting directly [secretariat@firesafeeurope.eu](mailto:secretariat@firesafeeurope.eu)).

## 9. **Your right to withhold information and your right to withdraw information after you have given it**

- 9.1 You may restrict your internet browser's use of Cookies. For more information, see our website terms and conditions.
- 9.2 You may withdraw your consent for us to use your personal data as set out in section in 5 at any time by contacting us using the details set out in section 15, and we will delete your data from our systems. However, you acknowledge this may limit our ability to provide the best possible services to you.

## 10. **How Can You Access Your Data?**

You have the legal right to ask for a copy of any of your personal data held by us (where such data is held). Please contact us for more details at [secretariat@firesafeeurope.eu](mailto:secretariat@firesafeeurope.eu) or using the contact details below in section 14.

## 11. **What Cookies Do We Use and What For?**

- 11.1 Our site may place and access certain first party cookies on your computer or device. First party cookies are those placed directly by us and are used only by us. We use cookies to facilitate and improve your experience of our site and to provide and improve services. For more details, please refer to section 5, above, and to section 11.6 below. We have carefully chosen these cookies and have taken steps to ensure that your privacy is protected and respected at all times.
- 11.2 By using our website you may also receive certain third party cookies on your computer or device. Third party cookies are those placed by websites, services, and/or parties other than us. At the moment, we do not use third party cookies on our site for (Universal Google Analytics). For more details, please refer to section 5, above, and to section 11.5 below.
- 11.3 All cookies used by and on our site are used in accordance with current Belgian and EU cookie law.
- 11.4 Certain features of our site depend on cookies to function. Belgian and EU cookie law deems these cookies to be "strictly necessary". These cookies are shown below in section 11.5 and 11.9. Your consent will not be sought to place these cookies. You may still block these cookies by changing your internet browser's settings, but please be aware that our site may not work as intended if you do so. We have taken great care to ensure that your privacy is not at risk by allowing them.
- 11.5 The following first party cookies may be placed on your computer or device:

Name of Cookie	Purpose	Strictly Necessary
Universal Google Analytics	for measuring how users interact with your website Determine which domain to measure Distinguish unique users Throttle the request rate Remember the number and time of previous visits Remember traffic source information Determine the start and end of a session Remember the value of visitor-level custom variables	Yes

11.6 Our website only uses analytics services provided by Google Analytics to track and report website traffic

11.7 Website analytics refers to a set of tools used to collect and analyse usage statistics, enabling us to better understand how people use our site. This, in turn, enables us to improve our site and the products and services offered through it. You do not have to allow us to use these cookies, as detailed below, however whilst our use of them does not pose any risk to your privacy or your safe use of our site, it does enable Us to continually improve our site, making it a better and more useful experience for you.

11.8 The analytics service(s) used by our site use(s) cookies to gather the required information. Certain of these cookies may be placed immediately when you first visit our site and it may not be possible for us to obtain your prior consent (Google Analytics). You may remove these cookies and prevent future use of them.

11.9 The analytics service(s) used by our site use(s) the following cookies:

Name of Cookie	First / Third Party	Provider	Purpose
_ga	First	Google analytics	Determine which domain to measure Distinguish unique users Throttle the request rate Remember the number and time of previous visits Remember traffic source information Determine the start and end of a session Remember the value of visitor-level custom variables

11.10 It is recommended that you keep your internet browser and operating system up-to-date and that you consult the help and guidance provided by the developer of your internet browser and manufacturer of your computer or device if you are unsure about adjusting your privacy settings.

## 12 Summary of your rights under GDPR

Under the GDPR, you have:

- 12.1. the right to request access to, deletion of or correction of, your personal data held by us;
- 12.2. the right to complain to a supervisory authority;
- 12.3. be informed of what data processing is taking place;
- 12.4. the right to restrict processing;
- 12.5. the right to data portability;
- 12.6. object to processing of your personal data;
- 12.7. rights with respect to automated decision-making and profiling (see section 14 below).
- 12.8. Any participant can opt-out from our activities at any time. The opt-out is available by clicking on the Un-subscription link available at the end of the emailing or contact us directly by email – [secretariat@firesafeeurope.eu](mailto:secretariat@firesafeeurope.eu)

To enforce any of the foregoing rights or if you have any other questions about our site or this privacy policy, please contact us using the details set out in section 14 below.

## 13. Automated Decision-Making and Profiling

13.1 In the event that we use personal data for the purposes of automated decision-making and those decisions have a legal (or similarly significant effect) on you, you have the right to challenge to such decisions under GDPR, requesting human intervention, expressing their own point of view, and obtaining an explanation of the decision from us.

13.2 The right described in section 14.1 does not apply in the following circumstances:

1. The decision is necessary for the entry into, or performance of, a contract between the you and us;
2. The decision is authorised by law; or
3. You have given you explicit consent.

13.3 Where we use your personal data for profiling purposes, the following shall apply:

- a. Clear information explaining the profiling will be provided, including its significance and the likely consequences;
- b. Appropriate mathematical or statistical procedures will be used;
- c. Technical and organisational measures necessary to minimise the risk of errors and to enable such errors to be easily corrected shall be implemented; and
- d. All personal data processed for profiling purposes shall be secured in order to prevent discriminatory effects arising out of profiling.
- e. We are not currently make automated decisions.

13.4 We currently profile your personal data for the following purposes:

- for event organization
- for community building

- for sending news and information linked to your professional activities

#### 14. **Contacting Us**

If you have any questions about our site or this privacy policy, please contact us by email at [secretariat@firesafeeurope.eu](mailto:secretariat@firesafeeurope.eu) or by post at Rue Mercelis 57 – BE 1050 Brussels. Please ensure that your query is clear, particularly if it is a request for information about the data we hold about you (as under section 11, above).

#### 15. **Changes to Our Privacy Policy**

We may change this privacy policy as we may deem necessary from time to time, or as may be required by law. Any changes will be immediately posted on our site and you will be deemed to have accepted the terms of the privacy policy on your first use of our site following the alterations. We recommend that you check this page regularly to keep up-to-date.

## **Schedule 1: our use of personal data and our purpose**

The following personal data may be collected, held, and processed by the Association:

a) **Contact data:**

- (a) **First Name & Last Name**
- (b) **Professional Email**
- (c) **Company name**
- (d) **Fixed phone**
- (e) **Mobile phone**
- (f) **Website**
- (g) **Social Media accounts (Facebook, Twitter and LinkedIn)**
- (h) Information for legal requirements (HR, Finances...)

This type of data is held and processed to allow the Association to communicate on its activities through emailing (Newsletter, Flash news, Press releases, ...), direct contact (phone, direct messaging on social media platform), through (digital) invitations to our meetings and events.

b) **Social Media Handels**

This type of data is held and processed to allow the Association to communicate on its activities direct messaging.

We currently use the following service:

Mailchimp – First and Last Name + email address+ Company

Daylite – CRM

SurveyMonkey – Polls

Zoom - webinar

Dropbox to file and archive

Gandi (server)

Microsoft Office M365

Lauroscope (webmaster)

Tracer sprl (communication services + operational support)

Action SPRL (Management)

## Schedule 2: Our Specific Data Protection Measures

These are the measures we take when working with personal data:

- b) Where any personal data is to be erased or otherwise disposed of for any reason (including where copies have been made and are no longer needed), it should be securely deleted and disposed of. Hardcopies should be shredded, and electronic copies should be deleted securely.
- c) Personal data may be transmitted **over secure networks** only; transmission over unsecured networks is not permitted in any circumstances;
- d) Personal data may not be transmitted over an open wireless network if there is a wired alternative or securised wireless option that is reasonably practicable;
- e) Personal data contained in the body of an email, whether sent or received, should be copied from the body of that email and stored securely. The email itself should be deleted, only accessible to the right personnel. All temporary files associated therewith should also be deleted;
- f) Where Personal data is to be transferred in hardcopy form it should be passed directly to the recipient and/or sent using the registered letter with delivery receipts.
- g) No personal data may be shared informally and if an employee, agent, sub-contractor, or other party working on behalf of the Association requires access to any personal data that they do not already have access to, such access should be formally requested to the FSEU office.
- h) All hardcopies of personal data, along with any electronic copies stored on physical, removable media should be stored securely in a locked box, drawer, cabinet or similar;
- i) No personal data may be transferred to any employees, agents, contractors, or other parties, whether such parties are working on behalf of the Association or not, without the authorisation of the Managing Director;
- j) Personal data must be handled with care at all times and should not be left unattended or on view to unauthorised employees, agents, sub-contractors or other parties at any time;
- k) If personal data is being viewed on a computer screen and the computer in question is to be left unattended for any period of time, the user must lock the computer and screen before leaving it;
- l) No personal data should be stored on any mobile device (including, but not limited to, laptops, tablets and smartphones), whether such device belongs to the Association or otherwise.
- m) No personal data should be transferred to any device personally belonging to an employee and personal data may only be transferred to devices belonging to agents, contractors, or other parties working on behalf of the Association where the party in question has agreed to comply fully with the letter and spirit of this policy and of the Regulation (which may include demonstrating to the

Association that all suitable technical and organisational measures have been taken);

- n) All personal data stored electronically are backed up every 6 months with backups stored **onsite**.
- o) All electronic copies of personal data should be stored securely using passwords
- p) All passwords used to protect personal data should be changed regularly and should not use words or phrases that can be easily guessed or otherwise compromised. All passwords must contain a combination of uppercase and lowercase letters, numbers, and symbols. All software used by the Association is designed to require such passwords;
- q) Under no circumstances should any passwords be written down or shared between any employees, agents, contractors, or other parties working on behalf of the Association, irrespective of seniority or department. If a password is forgotten, it must be reset using the applicable method.