FOUNDATION FOR EUROPEAN PROGRESSIVE STUDIES (hereinafter "FEPS")

Website Privacy Notice

Last updated: 25 May 2018

1. About this Notice

- 1.1 This Privacy Notice ("**Notice**") explains how we (as defined below) collect, share and use any information that, alone or in combination with other information, relates to you ("**Personal Data**") when you ("**you**" and "**your**") use our websites http://www.fepseurope.eu/en/ and https://progressivepost.eu/ (the "**Website**").
- 1.2 This Notice also sets out the rights that you have in relation to the Personal Data that we process about you and how you can exercise them.
- 1.3 FEPS treats compliance with its privacy obligations seriously. This is why we have developed this Notice, which describes the standards that FEPS applies to protect Personal Data.
- 1.4 For the purposes of this Notice, FEPS, is a international non-profit organisation
- 1.5 with registered office at "Rue Montoyer 40, 1000 Brussels, Belgium" and registered with the Crossroads Bank of Enterprises under number 0896.230.213 "we", "us" or "our") acts as the data controller for the Personal Data that is collected via the Website. As a data controller, FEPS is responsible for ensuring that the processing of Personal Data complies with applicable data protection law, and specifically with the General Data Protection Regulation.
- 1.6 Please take the time to read this Notice carefully. If you have any questions or comments, please contact Alain Bloedt, Senior Communication Advisor via alain.bloedt@feps-europe.eu

2. What Personal Data does FEPS collect and why?

2.1 The types of Personal Data that we may collect about you, and the reasons why we process it, include:

Why we collect it	Types of Personal Data	Legal basis
To keep informed people who already showed their interest in FEPS activities and publications registering to our events or contacting us via email.	Names, emails, phone numbers and organisations	Consent or legitimate interest

To identify the most interesting and relevant content published in our website	Information regarding your device, such as IP address, MAC address, browser used	Consent
To distribute our magazine The Progressive Post to subscribers and contributors	Name, Postal address	Consent

2.2 We may also collect certain information automatically from your device. Specifically, the information we collect automatically may include information like your IP address, [device type, unique device identification numbers, browser-type, broad geographic location (e.g. country or city-level location) and other technical information. We may also collect information about how your device has interacted with our Website, including the pages accessed and links clicked.

We collect this information for the purposes of this Notice, including to enable us to better understand the visitors who come to our Website, where they come from, what content on our Website is of interest to them and to set up a statistical database. We use this information for our internal analytics purposes and to improve the quality and relevance of our Website to our visitors.

Some of this information may be collected using cookies and similar tracking technology, as explained further in our Cookie Notice which is available here

2.3 [OPTIONAL: From time to time, we may receive Personal Data about you from third party sources about EU Correspondents and other journalists provided by EU Institutions and national embassies, about militants of Progressive parties provided by the parties, about registrations to events we organised with other partners, but only where we have checked that these third parties either have your consent or are otherwise legally permitted or required to disclose your Personal Data to us.

The types of Personal Data we collect from third parties include names, emails, phones and job positions and we use this Personal Data we receive from these third parties to keep inform them about FEPS activities and research.

2.4 In general, we will use the Personal Data we collect from you only for the purposes described in this Notice or for purposes that we explain to you at the time we collect your Personal Data. However, we may also use your Personal Data for other purposes that are not incompatible with the purposes we have disclosed to you (such as archiving purposes in the public interest, scientific or historical research purposes, or statistical purposes) if and where this is permitted by applicable data protection laws.

3. Who does FEPS share your Personal Data with?

- 3.1 We may disclose your Personal Data to the following categories of recipients:
 - (a) to FEPS Members for purposes consistent with this Notice. We take precautions to allow access to Personal Data only to those staff members who have a legitimate business need for access and with a contractual prohibition of using the Personal Data for any other purpose.
 - (b) to our third party vendors, services providers and partners who provide data processing services to us, or who otherwise process Personal Data for purposes that are described in this Notice or notified to you when we collect your Personal Data. This may include disclosures to third party vendors and other service providers we use in connection with the services they provide to us, including to support us in areas such as IT platform management or support services, infrastructure and application services, marketing, data analytics;
 - (c) to any competent law enforcement body, regulatory, government agency, court or other third party where we believe disclosure is necessary (i) as a matter of applicable law or regulation, (ii) to exercise, establish or defend our legal rights, or (iii) to protect your vital interests or those of any other person;
 - (d) to our auditors, advisors, legal representatives and similar agents in connection with the advisory services they provide to us for legitimate business purposes and under contractual prohibition of using the Personal Data for any other purpose;

4. How we protect your privacy

- 4.1 We will process Personal Data in accordance with this Notice, as follows
 - (a) **Fairness**: We will process Personal Data fairly. This means that we are transparent about how we process Personal Data and that we will process it in accordance with applicable law.
 - (b) **Purpose limitation**: We will process Personal Data for specified and lawful purposes, and will not process it in a manner that is incompatible with those purposes.
 - (c) **Proportionality**: We will process Personal Data in a way that is proportionate to the purposes which the processing is intended to achieve.

- (d) Data accuracy: We take appropriate measures to ensure that the Personal Data that we hold about you is accurate, complete and, where necessary, kept up to date. However, it is also your responsibility to ensure that your Personal Data is kept as accurate, complete and current as possible by informing FEPS us promptly of any changes or errors. You should notify us of any changes to the Personal Data that we hold about you (e.g. a change of address).
- (e) **Data security:** We use appropriate technical and organisational measures to protect the Personal Data that we collect and process about you. The measures we use are designed to provide a level of security appropriate to the risk of processing your Personal Data. The privacy terms of the two tools we use are: <u>Privacy Policy</u> <u>Active Campaign Apple Privacy Policy</u>
- (f) Data processors: We may engage third parties to process Personal Data for and on behalf of FEPS. We require such data processors to process Personal Data and act strictly on our instructions and to take appropriate steps to ensure that Personal Data remains protected.
- (g) **Data Retention:** We retain Personal Data we collect from you as long as you have not withdrawn your consent or as long as we have a legitimate interest as assocationsto do so.

5. Your data protection rights

- 5.1 You have the following data protection rights:
 - (a) If you wish to access, correct, update or request deletion of your Personal Data, you can do so at any time by contacting us using the following contact details Alain Bloedt, FEPS Senior Communications Advisor alain.bloedt@feps-europe.eu.
 - (b) In addition, in certain circumstances, as stipulated in the applicable data protection legislation, you can **object to processing** of your Personal Data, ask us to **restrict processing** of your Personal Data or **request portability** of your Personal Data. Again, you can exercise these rights by contacting us using the following contact details [Alain Bloedt, FEPS Senior Communications Advisor alain.bloedt@fepseurope.eu
 - (c) If we have collected and process your Personal Data with your consent, then you can **withdraw your consent** at any time. Withdrawing your consent will not affect the lawfulness of any processing we conducted prior to your withdrawal, nor will it affect processing of your Personal Data conducted in reliance on lawful processing grounds other than consent.
 - (d) You have the right to opt-out of marketing communications we send you at any time. You can exercise this right by clicking on the "unsubscribe" or "opt-out" link in the marketing e-mails we send you. To opt-out of other forms of marketing (such as postal marketing or telemarketing), then please contact us using the contact details provided above.
 - (e) If you have a complaint or concern about how we are processing your Personal Data then we will endeavour to address such concern(s). If you feel we have not sufficiently addressed your complaint or concern, you have the **right to complain to a data protection authority** about our collection and use of your Personal Data. For more information, please contact your local data protection authority. (Contact

details for data protection authorities in the European Economic Area, Switzerland and certain non-European countries (including the US and Canada) are available <u>here</u>.)

5.2 We respond to all requests we receive from individuals wishing to exercise their data protection rights in accordance with applicable data protection laws.

6. Linking to other websites

6.1 The Website may contain hyperlinks to websites owned and operated by third parties. These websites have their own privacy policies and we urge you to review them. They will govern the use of Personal Data you submit whilst visiting these websites.

We do not accept any responsibility or liability for the privacy practices of such third party websites and your use of such websites is at your own risk.

7. Updates to this Notice

- 7.1 We may update this Notice from time to time in response to changing legal, technical or business developments. When we update our Notice, we will take appropriate measures to inform you, consistent with the significance of the changes we make. We will obtain your consent to any material Notice changes if and where this is required by applicable data protection laws.
- 7.2 You can see when this Notice was last updated by checking the "last updated" date displayed at the top of this Notice.