

CEMR

Member and stakeholder Privacy Notice

Last updated: Brussels, 17 December 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**") in your capacity as a member or stakeholder (or as our contact person at your organisation) ("**you**" and "**your**") of The Council of European Municipalities and Regions ("**CEMR**", "**we**" and "**our**").
- 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 CEMR treats compliance with its privacy obligations seriously. This is why we have developed this Notice, which describes the standards that CEMR applies to protect Personal Data.
- 1.4 For the purposes of this Notice, the CEMR interacts with you if you are a member or a stakeholder (e.g. previous members, press members, journalists, data subjects working in institutions or organisations, visitors of our website) and acts as the data controller for your Personal Data. As a data controller, the CEMR is responsible for ensuring that the processing of Personal Data complies with applicable data protection law, and specifically with the General Data Protection Regulation.
- 1.5 Please take the time to read this Notice carefully. If you have any questions or comments, please contact us via email at privacy@ccre-cemr.org

2. What Personal Data does CEMR 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
Member relationship management	<ul style="list-style-type: none"> • Identification data (name, professional address, professional telephone) • Education and training data (e.g. professional qualification, experience, professional organisations) • Data relating to profession (e.g. employment details, employer, job title, career, attendance). 	Legitimate interest of CEMR: to have an updated information about its members
Management of websites	<ul style="list-style-type: none"> • Identification data (name, address, telephone) 	Legitimate interest of CEMR: to have an up-to-

	<ul style="list-style-type: none"> • Data on CV (physical data and personal characteristics), • Education and training data (e.g. qualification, experience, professional organisations) • Data on affiliations to organizations, charities, volunteering, etc. • Data relating to profession and job (e.g. employment details, employer, job title, career, attendance). • Data revealing political opinions 	date information about its existing members on its websites for transparency reason
Communication with members	<ul style="list-style-type: none"> • Identification data (name, address, telephone); • Data on CV (physical data and personal characteristics); • National IDs and identifiers; • Data on CVs (leisure activities, affiliation, education and training, jobs) 	Legitimate interest if CEMR: to inform members about CEMR's activities and news
Communication with competent Belgian authorities	<ul style="list-style-type: none"> • Personal characteristics • Physical data • National IDs and identifiers • Data relating to profession and job (e.g. employment details, employer, job title, career, attendance). 	Compliance with legal obligations
Management of reimbursement requests of members for travels and expenses	<ul style="list-style-type: none"> • Identification data (name, professional address, professional telephone) • Financial characteristics (account number, credit/debit card details) 	Legitimate interest of CEMR: to ensure that members are compensated for their involvement in the CEMR's activities
Stakeholders' relationship management	<ul style="list-style-type: none"> • Identification data (name, address, telephone number) • Education and training data (e.g. professional qualification, experience, professional organisations); • Data relating to profession and job (e.g. employment details, employer, job title, career, attendance) 	Legitimate interest of CEMR: to maintain an updated information about CEMR's stakeholders
Communication with stakeholders about CEMR activities	<ul style="list-style-type: none"> • Identification data (name, professional address, professional telephone) • Education and training data (e.g. professional qualification, experience, professional organisations) • Data relating to profession and job (e.g. employment 	Legitimate interest of CEMR: to inform stakeholders who have shown an interest in CEMR's activities and news.

	<ul style="list-style-type: none"> • details, employer, job title, career, attendance). • Data revealing political opinions 	
Transfer to public authorities, institutions and public agencies for survey or study purposes or for any purposes that are closely related to our missions and activities	<ul style="list-style-type: none"> • Identification data (name, postal address, telephone) 	Legitimate interest of CEMR: to work closely and collaborate with public authorities, institutions and public agencies on matter related to its missions and activities.
Events' organisations	<ul style="list-style-type: none"> • Identification data (name, professional address, professional telephone) • Financial characteristics (account number, credit/debit card details) • National IDs and identifiers • Education and training data (e.g. professional qualification, experience, professional organisations) • Data relating to profession and job (e.g. employment details, employer, job title, career, attendance). • Data revealing political opinions 	Legitimate interest of CEMR: to ensure participation of members and stakeholders in the events organised by the CEMR.
Project's management involving members' personal data	<ul style="list-style-type: none"> • Identification data (name, address, telephone number) • National IDs and identifiers • Data relating to profession and job (e.g. employment details, employer, job title, career, attendance). 	Contractual necessity and legitimate interest of CEMR: to manage projects conducted by CEMR

If we ask you to provide any other Personal Data not described above, then the Personal Data we will ask you to provide, and the reasons why we ask you to provide it, will be made clear to you at the point we collect that Personal Data.

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.

Collecting this information enables us to better understand the visitors who come to our Website, where they come from, and what content on our Website is of interest to them. 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 on http://bit.ly/cookie_notice.

- 2.3 From time to time, we may receive Personal Data about you from third party sources (including national associations, European institutions, 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 your name, function, contact and we use this Personal Data we receive from these third parties to maintain and improve the accuracy of the records we hold about you or send you relevant information regarding our events and news.

- 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 CEMR share your Personal Data with?

- 3.1 We may disclose your Personal Data to the following categories of recipients:

- (a) To **other members, stakeholders or partners** for the purpose of informing them about our activities, events and to expand our network of members and stakeholders;
- (b) To **visitors of our website** who wish to learn more about our members and activities;
- (c) To the **European Commission, public authorities, institutions and public agencies** that carry out studies or surveys or work that that are closely related to our missions or activities;
- (d) 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, newsletters, event planning, business travel service providers, event planning organisations;
- (e) 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;
- (f) to **our auditors, advisors, legal representatives and similar agents** in connection with the advisory services they provide to us for legitimate business

- (g) purposes and under contractual prohibition of using the Personal Data for any other purpose;
- (h) to any other person if you have provided your prior consent to the disclosure.

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 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 CEMR of any changes or errors. You should notify your local CEMR contact 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. [Specific measures we use include: trainings provided to our staff members, confidentiality clauses, measures against physical danger, authentication systems and back-up systems.
- (f) **Data processors:** We may engage third parties to process Personal Data for and on behalf of CEMR. 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) **International data transfers:** Your Personal Data may be transferred to, and processed in, countries other than the country in which you are resident. These countries may have data protection laws that are different to the laws of your country (and, in some cases, may not be as protective).

Specifically, our servers are located in Belgium and Luxembourg and third party service providers and partners operate mainly in Belgium and the European Union. A few of our partners that we work with for the purpose of project's management operate outside the EU/EEA. This means that when we collect your Personal Data we may process it in any of these countries.

However, we have taken appropriate safeguards to require that your Personal Data will remain protected in accordance with this Notice. These include implementing the European Commission's Standard Contractual Clauses for transfers of Personal

Data which require CEMR and its Partners to protect Personal Data they process from the EEA in accordance with European Union data protection law.

- (h) **Data Retention:** We retain Personal Data we collect from you where we have an ongoing legitimate business need to do so (for example, to provide you with a service you have requested or to comply with applicable legal, tax or accounting requirements).

When we have no ongoing legitimate business need to process your Personal Data, we will either delete or anonymise it or, if this is not possible (for example, because your Personal Data has been stored in backup archives), then we will securely store your Personal Data and isolate it from any further processing until deletion is possible.

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 privacy@ccre-cemr.org
- (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 privacy@ccre-cemr.org
- (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 [here](#).)

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. Updates to this Notice

6.1 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.

6.2 You can see when this Privacy Notice was last updated by checking the “last updated” date displayed at the top of this Notice.