



European Network on Independent Living

PRIVACY POLICY

1. Statement of intent

The European Network on Independent Living Brussels Office NGO (further referred to as: ENIL) attaches great importance to the protection of individuals' privacy. The aim of this Privacy Policy is to be clear and transparent about which data we collect and how it is processed. Our objective is to do our utmost to guarantee individuals' privacy and treat personal data with the greatest respect.

In everything it does, ENIL is committed to respecting the legal obligations and rules set out in the EU General Data Protection Regulation (GDPR). GDPR is available at: <https://www.eugdpr.org>.

Specifically, ENIL will ensure the following:

- That personal data is used only for the purpose for which it was provided. The purposes for which ENIL collects data and the types of data it collects are set out in this Privacy Policy.
- That only such personal data is collected that is strictly necessary for the purposes set out in this Privacy Policy.
- That we ask for explicit permission of each individual to use and store their data, and in case there are changes to how we intend to use the data.
- That we take the necessary technical and organisational measures to guarantee the safety and protection of personal data.
- That we do not pass on any personal data to a third party, unless this is strictly necessary to achieve the purpose for which the data was provided.
- That ENIL staff, volunteers and Board are familiar with the Privacy Policy and the organisation's obligations and that they respect the Privacy Policy in their work.
- That we inform the general public about our Privacy Policy by making it available on ENIL's website www.enil.eu.

In case of any general or specific questions in relation to this Privacy Policy, the concerned individuals may contact ENIL using the contact details below.

European Network on Independent Living Brussels Office NGO
Nijverheidstraat 10
1000 Brussels
secretariat@enil.eu
Phone number : +322 893 25 83

2. Reasons for processing personal data

Individuals' personal data may be processed by ENIL for the following purposes and based on the following legal bases (in brackets):

- To **enable the work of ENIL as a network of organisational and individual members**, by maintaining a governance structure, enlisting members and maintaining membership lists (i.e. unmistakable consent);
- To **enable participation in events and activities** that ENIL organises, and if necessary, to reimburse costs incurred while attending such events or activities (i.e. execution of an agreement);
- To **disseminate** Newsletters, members' mailings, press releases and invitations (i.e. justified importance);
- To **communicate and share information** using the social media (i.e. unmistakable consent);
- To **collect views** on issues ENIL works on, through organising surveys (i.e. unmistakable consent);
- To **apply for funding or a subsidy**, and to report to funders (i.e. legal obligation);
- To **collect donations** from the public (i.e. unmistakable consent);
- To **employ staff** and to host volunteers (i.e. legal obligation).

To achieve the purposes listed above, ENIL may ask individuals to provide the following data:

- **Personal contact details:** name and surname, postal address, mobile and/or phone number, email address;
- **Officially issued identification details:** ID card or passport number, expiry date, place of issue, national tax registry number;
- **Personal information:** gender, date of birth, place of birth, nationality, family status, disability status, dietary requirements, access needs, emergency contact (name and phone number), the use of Personal Assistance, bank account details (account number, bank name and address);
- **Membership of an organisation:** name of the organisation, contact person, e-mail, number of members, whether the organisation is managed by disabled persons, organisation's constitution and statutes.

Once collected, ENIL will store and process the data according to this Privacy Policy. ENIL commits to only using the data for the purposes for which they were provided.

3. Sharing data with a third party

The data provided to ENIL can only be shared with a third party when this is strictly necessary.

We will make use of the services of a third party in the following cases:

- Enlisting new members and Newsletter subscribers (via ENIL's website, maintained by [Bozooart](#) and hosted by [Avalon](#));
- Distribution of ENIL Newsletters, members' mailings, press releases, statements or invitations to events (via [MailChimp](#));

- E-mail correspondence (via [Microsoft Office 365](#))
- Hosting webinars (via [GoToWebinar](#));
- Carrying out surveys (via [Google Docs](#) or [SurveyMonkey](#));
- Disseminating information (via [Facebook](#), [Twitter](#) or [YouTube](#));
- Collecting donations (via [PayPal](#));
- Collecting statistics about visits to our website (via [Google Analytics](#));
- Organising events (when required for security or administrative purposes, for example by the European Parliament, European Commission or the Council of Europe);
- Employing staff (social secretariat administration, payroll companies);
- Registration requirements (Le Moniteur belge).

ENIL will not share personal data with any third party unless it has concluded a data processing agreement, consistent with our Privacy Policy with this party. This is needed to ensure that the necessary arrangements are made to guarantee the safety of personal data by third parties.

Beyond the situations described above, ENIL will not share personal data with another party, unless it has the legal obligation and/or authorisation to do so. An example of this may be that the police asks ENIL to share data in the framework of an investigation. In this case, ENIL has an obligation to cooperate and thus share the requested data.

ENIL may also share personal data with third parties if given written permission to do so. Each individual has the right to withdraw this permission at any time. This will not affect the processing of data before the withdrawal of the permission.

ENIL will not share personal data with parties located outside the European Union (EU).

4. Minors

ENIL will only collect and process personal data of minors (below the age of 16) following the written permission from a parent or legal guardian to do so.

5. Length of data storage

ENIL will store personal data no longer than required for achieving the purpose for which it was collected or the period required by law.

Personal data will be stored no longer than a maximum of 5 years after its last active use for the purpose for which it was collected.

6. Security of the data

ENIL has taken the appropriate technical and organisational measures to protect personal data from unlawful use. The measures taken by ENIL include:

- All personnel employed by ENIL have the Privacy Policy annexed to their employment contract, and are required to comply with it.
- The use of login and password security on all the systems used by the organisation.
- The use of pseudonyms and encryption of personal data when needed.

- Regular back-ups of personal data, in order to be able to restore them after physical or technical incidents.
- Regular testing and evaluation of the organisation's procedures.
- Obligatory training for all new personnel in the organisation's personal data protection systems and the Privacy Policy.

7. Individual rights relating to personal data

Each person has the right to demand that ENIL corrects or deletes their personal data from its system. This Privacy Policy contains contact information for those who wish to do so, and it can also be found on the ENIL website ([www. http://enil.eu/contact-us/](http://enil.eu/contact-us/)). To avoid abuse, ENIL requires that each individual provides a copy of an ID card or passport, or a similar document, to allow the organisation to confirm their identity.

Individuals can also object against the processing of their personal data (or part of it) by any particular member of ENIL staff. You have the right to ask ENIL to send a copy of your personal data the organisation has collected, or you can ask ENIL to send your personal data directly to a third party of your choice. In such situations, ENIL will ask you to prove your identity before fulfilling the request.

8. Complaints

Complaints about the processing of personal data can be made directly to ENIL. Individuals may also file a complaint with the [Belgian Privacy Commission](#), the responsible authority for non-profit organisations located in Belgium.

9. Changes to the Privacy Policy

ENIL reserves the right to change this Privacy Policy. Changes will be announced on the ENIL website (<http://www.enil.eu>). The last changes to the Privacy Policy were made on 18 May 2018. Any older versions of the Privacy Policy will be archived and may be requested by e-mail.

Adopted by the ENIL Board on 18 May 2018