



EUROPE

WFTO-Europe Privacy and Data Protection Policy

May 2018



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WFTO-Europe Privacy and Data Protection Policy in conformity with the General Data Protection Regulation (GDPR)

This is a statement of the data protection policy adopted by the WFTO-Europe.

The Privacy and Data Protection Policy of WFTO-Europe aims at protecting the personal data of those various stakeholders connected to the organisation. It is created in accordance the European Union's General Data Protection Regulation (GDPR), which applies to all members of the EU and EEA from May 25, 2018 onwards, replacing the EU directive 95/46.

WFTO-Europe deals with data collection from external stakeholders in the following categories:

Members information (main contact details and emails) – the list of our members is in our internal server and is accessible to WFTO-Europe staff. Data collected refer to the specific organisations which are members of the network, have been provided and constantly updated by the members and are used for internal communication regarding the network and its activities. This data are confidential and not shared amongst members or with external people for any commercial purposes. This data are considered a legitimate interest for WFTO-Europe's core activities.

In its communication channels, WFTO-Europe only stores email and name used by individuals to subscribe to its **external newsletter**. This data are kept in our mailchimp account and mailing list with the only purpose of circulating the WFTO-Europe External Newsletter twice a year. We ask subscriber to give us the permission to use their data for sending the Newsletter. No commercial/marketing use is done for this information and we do not share this data with anyone else. Moreover, people are free to unsubscribe to the Newsletter whenever they want by only following a link at the end of the newsletter.

Enquiries sent through our website are directly received in one of our internal mail box and dealt with by one of the staff member. Emails or personal details are not stored in any database but just used to answer to the enquiries, unless there is a special request from the sender to keep her/his contact for providing further information.

Data about other **external stakeholders and partners** (generally email addresses of CSOs staff or academics) are collected and kept among our list of contacts only with the aim of exploring new possible collaborations.

In case we receive a free donation from **private donors**, contact and bank details that they decide to provide are kept just for the time and sake of finalising the transfer procedure.

Concerning information we collect through our website, we use **first party cookies** with the main purpose of facilitating our Members' access to their WordPress private account. We do not use cookies for commercial purposes but mainly to allow the browse to remember user's password and account ([Here](#) more about WordPress cookies can be found). For cookies set by other third parties (for example the ones set by Facebook via our website if somebody 'likes' one of the posts on our site), we do not have any direct control over the information that is collected by these cookies.

WFTO-Europe acknowledges that all data subjects have the following rights that we ensure to respect:

- 1) The right to be informed
- 2) The right of access
- 3) The right to rectification
- 4) The right to erasure
- 5) The right to restrict processing
- 6) The right to data portability
- 7) The right to object
- 8) Rights in relation to automated decision making and profiling.

Unless it is necessary for a reason allowable in the GDPR, WFTO-Europe will always obtain explicit consent from a data subject to collect and process their data. WFTO-Europe will not sell, rent, loan, trade, or lease any personal information collected online or offline. All information shall be kept absolutely confidential unless given consent to by the user.

In order to comply with the accountability principle of the GDPR, WFTO-Europe ensures that legal basis for processing personal data is clear and unambiguous, that all staff involved in handling personal data understand their responsibilities for following good data protection practice, that training in data protection has been provided to all staff and that rules regarding consent are followed. A specific clause about confidentiality is already included in staff agreements and contracts.

Under the GDPR, a defined role of Data Protection Officer (DPO) is required if an organization is a public authority, if it performs large scale monitoring or if it processes particularly sensitive types of data on a large scale.

Based on these criteria, WFTO-Europe does not require a Data Protection Officer to be appointed.

Data subject who wants to complain about the misuse of his/her personal data can submit their complaint to communication@wfto-europe.org.

Contact

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40 Rue Washington

1050 Brussels, Belgium

Telephone: (+32) 2 640 63 86

Email: communication@wfto-europe.org

