

## **AIB DATA PROTECTION POLICY**

### **1. REASONS FOR THIS POLICY**

Because of its activity, AIB needs to collect and use certain information about individuals: employees, members, providers, business's contacts and other people the organisation has a relationship with or may need to contact.

AIB processes the personal data transmitted to it in accordance with the legislation in force, and in particular Regulation 2016/679, of 27th April on the protection of individuals with regard to the processing of personal data (hereinafter, GDPR).

The aim of this policy is to describe how this personal data must be collected, used and stored in order to comply with GDPR and the Law of the Kingdom of Belgium.

This data protection policy ensures that AIB complies with GDPR and follows good practices; protects the rights of individuals (staff, customers and partners); is transparent for the user on how it stores and processes individuals' data and protects itself from the risk of a data breach.

### **2. GDPR**

The EU GDPR describes how organisations must collect, handle and store personal data.

These rules apply regardless of whether data is stored electronically, on paper or on other materials.

The EU GDPR is sustained by six principles (art. 5) which say that personal data must be:

- a) Processed lawfully, fairly and in a transparent manner in relation to individuals;
- b) Collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes;
- c) Adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed (data minimisation);
- d) Accurate and, where necessary, kept up to date;
- e) Stored for no longer than is necessary for the purposes for which the personal data are processed;
- f) Processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures (principle of accountability and "privacy by design and privacy by default");

### **3. WHO IS THE PROCESSING CONTROLLER OF YOUR DATA ACCORDING TO GDPR**

AIB AISBL, the Association of Issuing Bodies (hereinafter: AIB or the data controller)

Boulevard Albert II, 20 b.19

1000 Brussels - Belgium

E-mail: [info@aib-net.org](mailto:info@aib-net.org)

Phone: +44 (0)1494 681183

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Any question regarding the processing of your data may be sent to the following address: [info@aib-net.org](mailto:info@aib-net.org)

#### **4. DATA PROTECTION RISKS AND COMMUNICATION OF A PERSONAL DATA BREACH**

This policy aims to protect personal data from security risks, including:

- Breaches of confidentiality (for instance, information being disclosed inappropriately).
- Failing to collect consent when necessary.
- Reputational damage (for instance, in case the association suffers hacking attacks and hackers successfully gain access to sensitive data.)

In case of a personal data breach, AIB shall notify it to the competent supervisory authority no later than 72 hours after having become aware of it, unless the personal data breach is unlikely to result in a risk to the rights and freedoms of natural persons. Where the notification to the authority is not made within 72 hours, it shall be accompanied by reasons for the delay.

When the personal data breach is likely to result in a high risk to the rights and freedoms of natural persons, AIB shall communicate it to the data subject without undue delay and in the terms of the Art. 34 GDPR.

#### **5. POLICY SCOPE**

This policy applies to:

- The Secretary General of AIB;
- All staff and volunteers of AIB;
- All contractors, suppliers and other people working on behalf of AIB.

#### **6. DATA COLLECTED**

This policy applies as well to all data that AIB keeps relating to identifiable individuals. This can include (non-exhaustive list):

- Surname and first name;
- Position;
- Work title;
- E-mail address;
- Postal address;
- Telephone number;
- Any other information relating to individuals;
- Communications (by e-mail or other);
- The date and time of the data subject's access to the AIB website;
- The pages the data subject viewed on the AIB website.

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## 7. PURPOSE OF THE PROCESSING ACTIVITY

AIB processes the data provided to us with for the following purposes:

- Maintaining relations with providers, stakeholders, customers and other regular contacts.
- Informing about our activity.
- Advertising.
- Providing services.
- Responding to requests for information.
- Enabling the functioning of AIB's website by means of cookies.
- Establishing, carrying out and conducting contractual relationship with data subjects.

## 8. LEGAL GROUNDS FOR PROCESSING OF PERSONAL DATA

Depending on the type of business relationship or transaction, the legal ground for processing of personal data may be:

- The data subject's consent, given voluntarily on the website form when providing us with his/her data.
- By virtue of the existence of a contractual relationship.
- The legitimate interest will be the legal ground to process the subject's data when AIB is conducting the regular activity of the association and when the data subject is browsing AIB's website.
- Legal obligations included in the GDPR and in the Belgian Data Protection and E-Commerce Law.

## 9. RIGHTS OF THE DATA SUBJECT

All individuals who are subjects of personal data held by AIB have the following rights (Chapter III):

- **Right to be informed** (art. 12 to 14) about the purposes of the processing and the identity of the data controller.
- **Right of access** (art. 15) and verification of data: the data subject may, at any time, have access to the data that AIB holds on him/her or check if he/she is included in the database of AIB.
- **Right to rectification** (art. 16) of inaccurate data.
- **Right to erasure** (art. 17) in the cases legally established.
- **Right to restriction of processing** (art. 18): the data subject may, in particular, obtain a limitation of processing when he/she has objected to the processing, when he/she disputes the accuracy of the data, or when he/she considers that the processing is illegal.
- **Right to data portability** (art. 20): the data subject has the right to receive the personal data that he/she has communicated to AIB and may also ask to send this data to another data controller.

- **Right to object** (art. 21): the data subject may, in some cases, object to the use of his/her data by AIB.

You may at any time request access to your personal data, verify them, transfer them and, in some cases, limit its processing; rectify them and request the deletion of all these personal data from the database, except those for which AIB has an obligation to keep on record.

AIB will aim to provide the relevant data as quickly as possible but the latest within 30 days.

AIB will always verify the identity of the data subject making a subject access request before providing any information.

Data access request from individuals should be made by e-mail, attaching copy of Identification Card or Passport addressed to AIB at [secgen@aib-net.org](mailto:secgen@aib-net.org).

## 10. DURATION OF DATA STORAGE

Data will be stored for the duration of AIB's relationship with the data subject. Besides this, the law contains a number of legal retention periods for certain data. At the end of these periods the affected data are deleted. Data that is not deleted at that time is deleted as soon as the purpose of collecting, processing and using data no longer applies.

For the AIB archive, other historic and research purposes, the data may be kept longer.

## 11. DATA ACCURACY

AIB takes all necessary and reasonable steps to ensure that personal data is kept accurate and up to date. All employees working with data are responsible for its quality and accuracy. In case inaccuracies are discovered, AIB will make sure to update the information or delete outdated information from its databases.

Should you wish to communicate any changes or updates about the data AIB holds about you, you may do this in an easy way by just contacting AIB by email or by phone (c.f. 9. Rights of the Data Subject)

## 12. RESPONSIBILITIES

Everyone who works for or with AIB is responsible for ensuring that data are collected, stored and handled appropriately.

Responsibility areas:

- The AIB Board is ultimately responsible for ensuring that AIB meets its legal obligations.
- The legal advisor acts as Privacy Policy Coordinator and is responsible for:
  - o Updating the Board about data protection responsibilities and risks.
  - o Reviewing data protection procedures and related policies.
  - o Providing advice.
  - o Dealing with data protection questions from the staff and anyone else covered by this policy.
  - o Dealing with requests from individuals to exercise rights to access, rectification, cancellation and to object.

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- o Reviewing and approving any contract or agreement with third parties that may deal with AIB's sensitive data.
  - The General Secretary is responsible for:
    - o Ensuring all systems, services and equipment used for storing data meet acceptable security standards.
    - o Performing regular checks to ensure that the security of hardware and software is functioning properly.
    - o Approving any data protection statement attached to communications such as emails and letters.

### **13. TO WHOM ARE YOUR DATA DISCLOSED?**

AIB treats personal data as confidential information.

In certain circumstances, the GDPR allows personal data to be disclosed to law enforcement agencies without the consent of the data subject.

AIB will not communicate data to third parties under any condition other than those specified in this Policy, such as to achieve the objectives set out and defined in point 7, or under the conditions in which the law requires to do so.

AIB will ensure that any access request is legitimate, seeking assistance from the company's Privacy Policy Coordinator and from the AIB Board where necessary.

### **14. TECHNICAL AND OPERATIONAL MEASURES TO PROTECT PERSONAL DATA.**

AIB has taken appropriate measures to protect your personal data, both on the hub, on the website and at its offices. Such measures include but are not limited to:

- Encrypt and pseudonymise personal data where possible;
- Implement technical protection mechanisms such as malware detection, and firewalls;
- Ensure that key information infrastructure, data systems are not physically accessible for everyone;
- Implement security procedures, e.g. passwords must be changed from time to time, regular back-ups;
- Draft a data breach management procedure.

### **14. COMPLAINT WITH THE SUPERVISORY AUTHORITY**

AIB aims to ensure that all individuals are aware that their data is being processed and that they understand how the data is being used and how to exercise their rights.

If you have any question or complaint about the processing of your personal data by AIB, we kindly ask you to directly get in touch with AIB at: [info@aib-net.org](mailto:info@aib-net.org).

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In case no amicable solution to a request or complaint could be reached, AIB herewith informs you that you have the right to lodge a complaint by contacting:

Data Protection Authority Belgium

Rue de la Presse, 35,

1000 Brussels

Tel. +32 (0) 2 274 48 00

[commission@privacycommission.be](mailto:commission@privacycommission.be)