



PU Europe Data Privacy Policy in accordance with the EU General Data Protection Regulation (EU) 2016/679

PU Europe is the Federation of European Rigid Polyurethane Foam Associations. It represents the polyurethane (PUR/PIR) insulation industry in Europe. Its activities are as follows:

- 1 Develops one-voice positions on technical, safety, health and environment, standardisation and communication topics;
- 2 Funds and coordinates studies and research programmes;
- 3 Acts as information hub for its members and the wider public.

PU Europe, a non-profit international organisation headquartered in Belgium, is registered under the European Commission's register of interest representatives under the ID number: 27993486325-38.

Information on members and activities can be found via www.pu-europe.eu.

Foreword:

PU Europe has always been handling personal data of its members and contacts in the most respectful way. Due to the General Data Protection Regulation (GDPR) entry into force, which implies that the existing Belgian Privacy Act of 8 December 1992 will at least in part have to be repealed, PU Europe has now formalised the way it deals with the personal data of its personnel, its members, members of direct members and parties which we believe have a legitimate interest in following our activities and are therefore on our database.

This PU Europe data privacy policy was drawn up in accordance to the GDPR and with the best of our knowledge in May 2018 and explains how your personal data are processed and who to contact to get more information and/or access to your data.

1. Type of Personal Data that PU Europe collects

Since the establishment of our Association in 1981, you may have provided us or might do so with personal data information. This information may include name, surname, gender, professional function, email address, address, phone number(s), employer, subscription to mailing lists and attendance to PU Europe meetings. In addition, we may also (or have already) gathered visual representation of our members or member of members such as photographs and videos taken at meetings or building work premises. Furthermore, PU Europe collects and store personal data of relevance or required by Belgian administrations or judiciary powers.

In no way PU Europe collects, stores or processes personal data of data subjects younger than 18-year-old, and we have put in place the necessary tools to provide an adequate level of protection of the infrastructure, based in the EU, storing your data. Furthermore, the thorough analyse we carried out early 2018 did not show that sensitive personal data are collected or stored (except in the case of PU Europe employees or members of the Managing Committee).

2. Methods of Personal Data Collection

Personal data are usually freely submitted to PU Europe directly by our members or the members of our members, and upon request for the personnel. For the other data subjects on our database (employees of partner organisations, consultancies, requests sent via email, list of journalists or EU civil servants...), PU Europe believes a legitimate interest in our activities from their side exist and we are therefore using public sources, such as the European Parliament website, the directories of the European Institutions, newspapers and so on to collect those.

3. Purpose of use and processing of personal data

PU Europe is a membership driven organisation and as such relies on interactions with its members and members of members. Most of the personal data we collect and process are therefore used for membership management, and whenever they are not from our members (or members of members) or from our personnel, the purpose of their use falls within PU Europe activities (in particular communication and advocacy activities). For the personnel and members of the Managing Committee, additional personal data are collected in order to fulfil with legal Belgian obligations.

4. How your personal data are handled by PU Europe vis-a-vis Third-Parties

PU Europe has not and shall never sell your personal data to any third-party. We may however need to disclose some of your personal data to Third-Parties if required by Belgian authorities or for the fulfilment of our activities (examples include sharing the contact details of members with other members or sharing the birthdate and ID card number with the European Institutions for security checks). With regard to the sharing or handling of personal data of PU Europe employees with Third-Parties, agreements have been made to ensure the full compliance with the GDPR.

5. Cross-border processing of personal data

PU Europe shall not transfer personal data outside the European Economic Area (EEA) to a recipient whose domicile or registered office is in a country which does not fall under the adequacy decision enacted by the European Commission. However, in the unlikely event that such a case happen, PU Europe would transfer personal data only if this Third-Party is governed by the provisions of a data transfer agreement, which shall contain i) the standard contractual clauses as referred to in European Commission Decision 2010/87/EC, or ii) any other mechanism pursuant to privacy legislation, or any other regulations pertaining to the processing of personal data.

6. Storage of personal data

Unless a longer storage period is required or justified by law or through compliance with other Belgian legal obligation, PU Europe shall only store your personal data for the period necessary to achieve and fulfil the purpose in question.

7. Your Privacy Rights

In order to withstand to the highest level of personal data protection, PU Europe grants you the following rights:

1. Right of access to personal data;
2. Right to rectification, completion or updating of personal data;
3. Right to delete personal data (“right to be forgotten”) and
4. Right to unsubscribe to newsletters and other communication in case no further involvement is desired.

To exercise your right, please contact PU Europe’s Data Protection Officer: Eva Paz - secretariat@pu-europe.eu or call: +32 2 676 73 52. Once your request for change or deletion has been expressed in writing, PU Europe shall thrive to implement this action within 45 days.

8. Security of personal data

PU Europe undertakes to take all reasonable, physical, technological and organisational precautions in order to avoid (i) unauthorised access to your personal information and (ii) loss, abuse, or alteration of your personal data.

Notwithstanding the above, an infallible level of security can never be guaranteed, since no method of transmission or forwarding over the internet, or any method of electronic storage is 100 % watertight. Should any data breach occur, it will be communicated to the Privacy Commission of Belgium as required by law and to the data subjects concerned by the data breach.

PU Europe shall store all personal data, on its own servers or on those of service providers located in the European Union. Paper records shall be stored in the offices or in the secured archive room of PU Europe.

9. Update of the Data Privacy Policy

PU Europe is entitled to amend this Data Privacy Policy as and when it deems it necessary by posting a new version on the pu-europe.eu website. If important changes are done, they will be notified to the relevant owners of personal data of our database.

10. Contact PU Europe if you need more information or support

Should you need more information, please contact PU Europe’s Data Protection Officer: Eva Paz - secretariat@pu-europe.eu or call: +32 2 676 73 52.

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