

## GENERAL PRIVACY POLICY

We take the protection of your personal data seriously, and use our best efforts to ensure that we process it in accordance with the principles and requirements set out in the General Data Protection Regulation (EU) 2016/679 (GDPR).

This EuroCommerce privacy policy explains what personal data we collect from you, how we process it, and what rights you have. It covers personal data of individuals working for our member organisations and other individuals with whom we engage in the course of our business interactions and in pursuing our role in representing the retail and wholesale sector in Europe.

EuroCommerce a.i.s.b.l. (located at Avenue des Nerviens 85, 1040 Brussels, Belgium) is the data controller responsible for the processing of personal data described in this privacy policy.

## What personal data we process and for which purposes

### EuroCommerce membership

- **What data we collect and how.** When your organisation becomes a member of EuroCommerce, we collect information about you including, but not limited to, your name, position, organisation name, work address, email, and phone number, data related to your activities, including how you interact with us via correspondence or by attending our meetings, and any other data that you provide voluntarily. We store your personal data in our database.
- **Legal basis and purpose.** We process your personal data based on legitimate interest for the purpose of administering membership, maintaining regular contacts, providing you with information (including policy updates, newsletters, publications, and press releases), managing your participation in committees, working groups and other EuroCommerce events, and providing you with other relevant membership services. Where a specific need arises, we will ask for your consent to process your personal data beyond these listed purposes.

## Activities, meetings, and events

- **What data we collect and how.** We collect your personal data, including your name, contact details, your position, and your organisation name, when we organise meetings, as well as at conferences and other public events we organise alone or in cooperation with others. Occasionally, we will collect additional information, such as your photo, your bio, or relevant ID card or passport details for security purposes when we organise the event at EU institutions' premises. During our events, we may record your image, which we may post on our website, on our social media page, or in our internal publications. Please let us know in advance if you object to us taking your photo or filming you, or publishing your image.
- **Legal basis and purpose.** We process your personal data based on legitimate interest, for the purpose of registration and identification, sending you relevant practical information, as well as follow-up messages, such as satisfaction surveys and similar, and for managing your participation in the event. We keep a record of your participation in our events as an attendee or a speaker. When registering for our events, you will be given a choice to opt-in to receive more information about the events we organise. You may manage your options at any time by contacting us at [privacy@eurocommerce.eu](mailto:privacy@eurocommerce.eu).

## Business interactions with stakeholders

- **What data we collect and how.** We may obtain your personal data via many other business interactions, such as when you contact us or we contact you to pursue our mission and business objectives, when we receive your business card or your business details from you directly, from third parties, or from public available databases. This may include, for example, European and national institutions, business and other stakeholders, prospective members, or journalists.
- **Legal basis and purpose.** We process your personal data based on legitimate interest for the purpose of keeping in touch with you, maintaining business relationships, informing you about issues important for us, and about our policy positions.

## Correspondence

- **What data we collect and how.** If you communicate with us by email, postal mail, or other form of communication, we may retain such correspondence and the information contained in, including your name, contact details, as well as the content of the communication.
- **Legal basis and purpose.** We process your personal data based on legitimate interest for the purpose of responding to you, keeping in touch, or keeping a record of our correspondence.

## Service providers and business contracts

- **What data we collect and how.** We may also obtain your personal data, including your name, contact details, your position, and your organisation's name when your organisation provides goods and services to us, such as IT services, event management, catering, travel services, and similar.
- **Legal basis and purpose.** We process your personal data based on legitimate interest for the purpose of performing the contract, enquiring about goods and services, procuring new contracts, keeping in touch to pursue rights and obligations and generally to manage our business relationship.

## Information we collect automatically (Cookies)

Our website uses cookies. A cookie is a small text file placed on your web browser by websites that you visit while browsing the Internet. The cookie has a unique code which allows it to recognize your browser when you consult the website (cookie called "session"), or at your next visit (permanent cookie). Cookies are used to help make websites work efficiently, as well as to analyse traffic on websites. Cookies also allow websites to tailor information to individuals based on browsing preferences. Cookies are saved in a file on your computer or your mobile device. The website's server has only access to its own placed cookies, not to any other data saved on your computer or mobile device. The content of a cookie usually comprises the server's name which installed the cookie, an expiration date and a unique digital code.

The cookies we use do not collect data that reveal your personal identity and therefore do not make it possible for us to identify you.

### What cookies do we use?

- **Strictly necessary cookies.** These cookies are essential for our website to function properly. They enable you to browse on our website and use its features.
- **Performance cookies.** We use Google Analytics to analyse the use of our website, for example, which pages are visited most often, or if some web pages issue error messages. This helps us improve your browsing experience. Google Analytics analyses your interaction with our website and stores information about IP address, operating system, web browser, pages visited, location of the users, and the device used. Google does not combine your IP address with any other information Google may have. Google provides certain privacy options and choices in this regard, which are described [here](#).
- **Social widgets.** Our website has buttons that link to Flickr, LinkedIn, Twitter, and YouTube. When you share content through one of those platforms, the providers of these third-party social widgets may set cookies to collect information regarding our website users and their interactions with the social widgets. When you do so, you are bound by the terms and conditions and the privacy policy of these social media.

## How to give your consent and manage settings?

When visiting our website for the first time, a cookie banner will appear. By continuing your visit on our website, you consent to our use of cookies as specified in this cookie policy.

**You can enable, disable or delete cookies through your Internet browser. In order to do this, follow the instructions provided by your browser. However, if you choose to disable cookies, some features of our website may not work properly.**

## With whom we share your personal data

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We do not sell or otherwise disclose your personal data to third parties, unless you request it or **consent** to it, except as described in this privacy policy.

We may share your personal data with the following recipients:

- With **third party service providers** whom we engage to provide services. This may include data sharing services (such as WeTransfer) to transmit large files, email service providers to inform you about our events (such as Mail Chimp and Survey Monkey which are based in the U.S. and are certified under the EU-US Privacy Shield), image and video sharing services (such as Flickr, and YouTube), and other such similar service providers that we engage to provide technical support for carrying out our activities.
- With **EuroCommerce members and events participants** in the context of EuroCommerce activities and events, for example a committee or a working group, a conference or other such event.
- With **co-organisers or partners of our events**. If you do not wish that we share your personal data, please tell us when you register for events, or you contact us directly at [privacy@eurocommerce.eu](mailto:privacy@eurocommerce.eu)

## Links to other websites

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The EuroCommerce website includes links to third-party websites, including the websites of our members. These websites are not managed by EuroCommerce. Any personal data you provide on such third-party websites is subject to their privacy policies. We are not responsible for the practices and policies of such third-party websites. Please read their respective privacy policies for more information.

# How long we keep your personal data

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We keep your personal data for as long as it is necessary to provide membership services, to pursue our mission, to maintain the relationship with you, or to perform a contract. We will keep your personal data when you have left a member organisation or have changed positions, in order to engage with you in another capacity or to maintain the relationship.

As a general rule, we keep the record of your participation in our meetings and events for two years, unless we need to keep it longer, including for archiving purposes, for the purpose of complying with competition law, or for other relevant purposes.

For more information on how long we keep your personal data please contact us at [privacy@eurocommerce.eu](mailto:privacy@eurocommerce.eu)

## Data security

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We use necessary technical and organisational security measures to protect your personal data against accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, or any other unlawful or unauthorised data processing.

We have trained all EuroCommerce staff, and we will do so regularly, about the importance of maintaining the privacy, confidentiality, and security of your personal data.

## Your rights

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1. You have the right to know how we process your personal data (**access**).
2. You have the right to **correct** your personal data if it is inaccurate or incomplete.
3. Subject to certain exceptions, you may request us to **delete** your personal data if they are no longer necessary, if you withdraw your consent, or if you object to their processing, and there are no overriding reasons for us processing your personal data. You also have the right to **object** to us processing your personal data and **withdraw your consent** at any time. In particular, you may **object to us processing your personal data for direct marketing purposes**, such as sending you event invitations, publications or other information. You may unsubscribe from our communications via the means provided in the communications we send or by contacting us as indicated below.

Please note that you may not be able to benefit from all our services if you request the deletion of your personal data, object to, or withdraw your consent, to the processing of your personal data. If you ask us not to contact you by email, we will retain a copy of that email in order to comply with your no-contact request.

4. You have the right to ask for **data portability**.
5. You have the right to **lodge a complaint** with the Belgian Data Protection Authority.

If you would like to exercise your rights, please contact us by the means provided at the end of this document. We shall provide you information on the action we have taken, without undue delay and in any event within one month of receiving your request. This period may be extended by two further months where necessary. We shall inform you if such an extension is needed.

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## Changes to this privacy policy

We may change this privacy policy from time to time. The most recent version will be available on our website and will include the date of its latest revision. All changes will be effective from that date. You should check our website to see the current privacy policy in force and any changes that may have been made to it.

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## How to contact us

If you have any questions, demands or complaints regarding our collection and processing of your personal data, please send us email at: [privacy@eurocommerce.eu](mailto:privacy@eurocommerce.eu) or write to us at:

EuroCommerce a.i.s.b.l.  
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B-1040 Brussels