

SINGA BELGIUM ASBL

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PRIVACY POLICY

**Effective Date: 01-09-2019**

The protection of your data is an important matter to us and we do all we can to protect them. The personal data you will provide us with will only be processed by SINGA BELGIUM ASBL (“SINGA”, “we”, “us”, or “our”), whose head office is established at Place du Jeu de Balle 39, 1000 Brussels, Belgium.

**1. Introduction**

This online Privacy Policy is provided to explain the online information practices of SINGA and the choices you can make about the way that data which directly or indirectly identifies you (“Personal Data”) is collected and used on our website (collectively, this “Site”), [www.singa-belgium.org](http://www.singa-belgium.org). For the purpose of the General Data Protection Regulation (the “GDPR”), we are the data controller and we use your Personal Data only in accordance with the following principles and in compliance with applicable data protection laws including the GDPR.

The official version of this Privacy Policy is written in the English language. Any translations of this Privacy Policy shall be for reference purposes only. Therefore, the terms of this Privacy Policy in the English language shall prevail over any terms of any translations hereof in the event any dispute arises regarding any conflicting terms.

Please read this policy carefully so that you understand your rights in relation to your Personal Data, and how we will collect, use and process your Personal Data. If you do not agree with this Privacy Policy in general or any part of it, you should not access the Site. This Privacy Policy is effective as of the effective date listed above and is subject to change as set forth below in “Changes to our Privacy Policy.”

**2. Your consent**

Please take a few minutes to review this Privacy Policy before using this Site. By using this Site, you are consenting, to the extent permissible under applicable law, to the collection, use and disclosure of your information as set forth in this Privacy Policy. If you do not agree to be bound by this Policy, you may not use this Site.

**3. What information do we collect?**

The Site uses the Google Analytics service to help us assess how users access and utilize the Site by collecting bits of information such as statistical usage and telemetry information including an anonymized version of your IP address. This information is used to create aggregate statistics about the operation and use of the Site such as when the Site is accessed, the pages which refer visitors to the Site, and other information that helps us understand how the Site is used and how it might be improved in the future.

Like many services, Google Analytics uses first-party cookies to track user interactions as in our case, where they are used to collect information about how users use our Site. This information is used to

compile reports and to help us improve our Site. The reports disclose website trends without identifying individual visitors. You can opt out of Google Analytics without affecting how you visit our Site – for more information on opting out of being tracked by Google Analytics across all websites you use, visit this Google page: <https://tools.google.com/dlpage/gaoptout>.

In general, when you visit the Site we only incidentally collect such information as your IP address and/or information about your browser or computing device that enables us to provide you with access to the Site and appropriate content. There are pages, however, on which you need to provide additional Personal Data to register, contact us, or request news and updates.

Such Personal Data are the information you manually provide and will include, depending on the situation:

- First name and last name
- Contact information (telephone number, email address, social media handle)
- Gender
- Date of birth
- Spoken languages
- Location
- And the results of any questionnaire(s) that you agree to respond to.

In addition, Personal Data you might share as part of an application for employment through the Job section includes:

- Name
- Contact information
- Work experience
- Educational qualifications
- And any information you choose to submit
- Please note we might receive information from third parties in connection with your job application, such as referees and recruiters.

You may also provide to us Personal Data related to other people, for example to suggest a new member or recommend someone for employment. As part of this process, you will need to provide Personal Data, such as name and contact information. You agree to and confirm that you have sought and received consent to share such person's Personal Data with us prior to submission. SINGA will confirm this consent within one month of receipt using the provided contact information. In the absence of consent confirmation, SINGA will delete such Personal Data.

#### **4. How and why will we use your data?**

As it is in our legitimate interests to be responsive to you and to ensure the proper functioning of our products and organization, we will use your information to:

- provide requested information about our organization
- evaluate employment candidates
- respond to requests for information or connections with SINGA staff
- process questionnaire responses submitted by you
- evaluate potential new SINGA members
- see any matching interests between newcomers and locals.

We will also use the Personal Data we collect to improve the Site and to ensure the Site's content is presented in the most effective manner for you and your device; administer the Site, and for internal operations including troubleshooting, data analysis, testing, statistical and survey purposes, or to keep the Site safe and secure.

With your consent, we will use your Personal Data to send you information that we think will be relevant to you, including newsletters and practical information. You may revoke this consent at any time by using any such provided "unsubscribe" link or by contacting us at [privacy@singa-belgium.org](mailto:privacy@singa-belgium.org).

## **5. How and how long do we intend to store your data?**

We store the information we collect about you for as long as is necessary for the purpose(s) for which we collected it and in accordance with applicable law and legitimate business interests.

When assessing the data retention period, we take into account the amount, nature, and sensitivity of the information, the potential risk of harm from unauthorized use or disclosure of the information, the purposes for which we process the data and whether we can achieve those purposes through other means, and the applicable legal requirements.

We will retain your information as follows:

- If you sign up for communications from us, we will keep your information until you unsubscribe after which we will retain only that information that will enable us to respect your (un)subscription preferences;
- If you apply for a position within SINGA, we will keep your information for a period of time necessary to facilitate the hiring process, provide you with notifications about new positions that match your interest or profile, and in either case not for greater than two years without reconfirming your interest. If you are a successful candidate, your information will be retained as part of your employee file for the duration of your employment plus six years following the end of your employment.

At the end of the retention period we may store your information in an aggregated and anonymized format to help us understand historical behaviors and to enhance the Site. Your Personal Data will be retained for longer if required by law or a court order and/or as needed to defend or pursue legal claims.

We strive to keep our records accurate and will make appropriate corrections when you notify us. Please let us know if there is incorrect information in any statements or other communications that you receive from us. If you would like to correct or update your personal information, please contact us using the relevant contact mentioned in section "12. How to contact us?".

## 6. How do we share your personal data with third parties?

We share your Personal Data with our Service Providers so that they can perform services on our behalf. We require our Service Providers to take appropriate technical and organizational measures to safeguard your Personal Data against loss, theft and unauthorized use, access, or modification.

Personal data might be shared:

- Within SINGA. We may share information collected through this Site with other members of the SINGA staff, who have received security and confidentiality training on managing your data. Before doing so, however, we may offer you the opportunity to “opt in,” as required by applicable law. SINGA staff members are required to handle information collected through this Site in accordance with this Policy.
- In Aggregate or De-Identified Form. We use information collected through this Site to create a compiled, aggregate view of usage patterns. We may share aggregate information with third-parties so we and they can better understand our user base. We may also provide third-parties with information about how particular individuals use this Site, but only on a de-identified basis (“Individualized Data”). Individualized Data is not personally identifiable, but it does reflect the usage patterns of a particular Site user, as opposed to Site users collectively. We may, for instance, provide basic demographic information in conjunction with providing Individualized Data. Third parties typically use this information for analytical purposes and to market their own services.
- To comply with Laws and Protection of Our Rights and the Rights of Others. We may disclose your information when we, in good faith, believe disclosure is appropriate to comply with the law, a court order or a subpoena. We may also disclose your information to prevent or investigate a possible crime, such as fraud or identity theft; to protect the security of this Site; to enforce or apply our online Terms of Use other agreements; or to protect our own rights or property or the rights, property or safety of our users or others.

## 7. What are cookies and how do we use them?

The use of the Site features may require the establishment of "cookies", namely a text file which, placed on your computer during your visit to our Site, proves to be essential to the use of our services, either by optimizing the consultation by improving and personalizing your user experience. They can also allow us to know the use that is made of our Site (pages visited, visit course), to establish statistics of attendance to improve the ergonomics of it. These are implemented by Google Analytics.

In any case, refusing these cookies or deleting them does not affect your ability to browse our Site.

You have various means to manage the implementation of these cookies including their permanent deletion. As a reminder, most web browsers (Chrome, Internet Explorer, Safari, Firefox, etc.) accept these cookies by default. You can change this default setting by going to the settings of your browser, each configuration is different (see the conditions of your browser and the path of its own). You can either block them or ask that your browser inform you before installing a cookie, or delete it, remembering that they have a limited life on your computers.

If you do not wish to receive cookies, you may set your browser to reject cookies or to alert you when a cookie is placed on your computer. You may also delete our cookies as soon as you leave this Site.

Third parties (i.e. Google Analytics) may deliver cookies to your computer or mobile device for the purpose of tracking your online behaviors over time and across nonaffiliated websites and/or delivering targeted advertisements either on this Site or on other websites.

You can find general information and details about cookies at [www.allaboutcookies.org/cookies](http://www.allaboutcookies.org/cookies).

Generally, we use the information we collect through this Site:

- the provision of our services, including our newsletters and regular communications regarding the activities we organize for our members.
- Regarding our website, it is essentially limited to collecting statistical data of visits, through "Google Analytics".

We respect your right to make choices about the ways we collect, use, and disclose the information you provide on or through this Site. This Online cookie policy describes some of your other choices, such as your choice to opt in of receiving "cookies."

- Do Not Track Mechanisms. Your browser may deliver a "Do-Not-Track ('DNT') signal" to this Site. Because of the changing state of technology and indecision within the technology and marketing industries regarding the meaning of DNT signals, we currently do not make any guarantee that we will honor DNT signals.
- Previously Expressed Preferences. You may change previously expressed preferences regarding how we use information you provide on or through this Site. For example, if you have provided your contact information and receive periodic emails from us, you may decide to stop receiving those emails by clicking the "unsubscribe" link in an email's footer.

- Direct Marketing. We will not use your personal information for direct marketing purposes, without your consent. We obtain your opt-in consent to our marketing communications via the Site. We include an “opt-out” link in electronic newsletters and promotional emails we send you, so that you can inform us that you do not wish to receive such communications from us or from SINGA in the future. If at any time you wish to be removed from our mailing lists, please contact us using the contact information provided at the end of this Policy. We will honor your request within a reasonable period of time and, in any event, within the time limits set by applicable law.

## **8. Privacy policies of linked websites**

For your convenience, hyperlinks may be posted on the Site that link to other websites (“Linked Sites”). We are not responsible for, and this Privacy Policy does not apply to, the privacy practices of any Linked Sites or of any companies that we do not own or control. Linked Sites may collect information in addition to that which we collect on the Site. We do not endorse any of these Linked Sites, the services or products described or offered on such Linked Sites, or any of the content contained on the Linked Sites. We encourage you to seek out and read the privacy policy of any Linked Site that you visit to understand how the information that is collected about you is used and protected.

## **9. Data about children under the age of eighteen**

The Service is not intended for use by children under the age of 18, and we do not knowingly collect Personal Data from such children. If we become aware that we have unknowingly collected Personal Data from a child under the age of 18, we will make all reasonable efforts to delete such information from our database. If you become aware that we have unknowingly collected Personal Data from a child under the age of 18, or if you believe that a child has submitted personal information on or through this Site without the consent and supervision of a parent or guardian please contact us so that we can take immediate and appropriate action (see Section “12. How to contact us?”).

## **10. What are your data protection rights?**

As a data subject under the General Data Protection Regulation, you have the following rights with regards to your personal information:

- Access: Subject to certain exceptions, you have the right to request a copy of the personal information we are processing about you, which we will provide to you in electronic form.
- Rectification: You have the right to require that any incomplete or inaccurate personal information that we process about you is amended or corrected.
- Deletion: In certain circumstances, you have the right to request that we delete personal information that we process about you.
- Restriction: You have the right to request that we restrict our processing of your personal information where:

- you believe such information to be inaccurate
  - our processing is unlawful but you oppose the deletion of your personal information
  - we no longer need to process such information for a particular purpose, but where we are not able to delete the data due to a legal or other obligation or because we require the information in connection with legal claims
  - you have objected to the processing of your personal information.
- **Portability:** You have the right to request that we transmit the personal information we hold in respect of you to another data controller, where this is:
    - personal information which you have provided to us
    - the processing is by automated means
    - we are processing that information on the basis of your consent or in order to perform our obligations under a contract to you.
  - **Objection:** Where the legal justification for our processing of your personal information is our legitimate interest, you have the right to object to such processing on grounds relating to your particular situation. We will abide by your request unless we have compelling legitimate grounds for the processing which override your interests and rights, or if we need to continue to process the data for the establishment, exercise or defense of a legal claim.
  - **Withdrawing Consent:** If we rely on your consent to process your personal information, you have the right to withdraw your consent at any time. This includes cases where you wish to opt out from marketing messages that you receive from us.
  - **Making a Complaint:** You may make a complaint at any time with the national data protection authority in the EU country where you are based. We would, however, appreciate the chance to deal with your concerns before you approach your supervisory authority so please contact us using the contact details provided below.

You can exercise these rights by contacting us at the contact details below. We may refuse your request for correction or deletion of your Personal Data where its retention is necessary, for example in the context of a legal dispute or as required by law. Where you have provided your consent for us to process your personal data, you can withdraw your consent at any time.

When you make such a request, we have one month to respond to you. If you would like to exercise any of these rights, please contact us.

## **11. Changes to our privacy policy**

We are continually improving and adding to the features and functionality of this Site and the services we offer through this Site. As a result of these changes (or changes in the law), we may need to update or revise this Policy.

To the extent permissible under applicable law, your continued use of this Site after we have posted the revised Policy constitutes your agreement to be bound by the revised Policy. However, we will honor the terms that were in effect when we gathered data from you.

For your convenience, whenever this Policy is changed, we will update the “effective date” at the top of this page. Be sure you check the effective date to see if this Policy has been revised since your last visit. We recommend that visitors to our Site review this Policy from time to time to learn of our new privacy practices and changes to our policies.

## **12. How to contact us?**

If you have any questions, concerns, or complaints about our use of your Personal Data, or would like to request access to, correction, or deletion of your Personal Data, please address them to:

Data Protection Officer  
Singa Belgium ASBL  
Rue Fernand Bernier 15, 1060 Brussels, Belgium  
privacy@singa-belgium.org

## **13. How to contact the appropriate authorities?**

Should you wish to report a complaint or if you feel that Our Company has not addressed your concern in a satisfactory manner, you may contact the Information Commissioner’s Office:

Data Protection Authority  
Rue de la Presse 35, 1000 Brussels, Belgium  
+32 2 274 48 00  
contact(at)apd-gba.be  
<https://www.dataprotectionauthority.be/contact-us>