

## Data Protection Policy of European Communications Office (ECO)

### 1. General

This Data Protection Policy ("Policy") applies to all data which you provide to us and/or which we collect about you, whether in the course of use of our services, including when visiting our website. In this Policy you can read more about the data we collect, how we handle your data and how long we will retain your data etc. Please read this Policy and contact us if any aspect of the Policy is unacceptable to you. The current version of the Policy is always available at [www.cept.org](http://www.cept.org).

### 2. Data Controller

The data controller responsible for the processing of your personal data is:

European Communications Office (ECO)  
Nyropsgade 37  
1602 Copenhagen V  
Telephone: +45 33 89 63 00  
Email: [dataprotect@eco.cept.org](mailto:dataprotect@eco.cept.org)  
DK15244607  
(the "Company")

The general legal processing framework is Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC, and the attendant rules. In addition, the Danish Act on supplementary provisions to the EU Regulation on the protection of natural persons with regard to the processing of personal data and on the free movement of such data (Act No. 502 of 23 May 2018) will apply.

All questions concerning this Policy, the processing of your data and any suspected non-compliance should initially be directed to IT Manager Kenneth Karlsson , email: [kenneth.karlsson@eco.cept.org](mailto:kenneth.karlsson@eco.cept.org), telephone: +45 33 89 63 14

### 3. Definitions

Some of the most important terms of data protection law are defined below:

**Personal Data** Any data relating to an identified or identifiable natural person. This means all information which, directly or indirectly, alone or when combined, can identify a particular natural person.

**Data Controller** The natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the Processing of Personal Data.

**Data Processor** The natural or legal person, public authority, agency or other body which processes Personal Data on behalf of the Data Controller

**Processing** Any operation or set of operations which is performed on Personal Data or on sets of Personal Data such as collection, recording, structuring, alteration, consultation, combination, disclosure by transmission or transfer to persons, public authorities, companies, etc. outside the Company.

**Special Categories of Personal Data**

Data concerning racial or ethnic origin, political opinions, religious or philosophical beliefs or trade union membership, genetic data, health data or data concerning a natural person's sex life or sexual orientation as well as biometric data if such biometric data are processed for the purpose of uniquely identifying a natural person (sensitive data).

**GDPR** Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC, and the attendant rules.

**Danish Data Protection Act (databeskyttelsesloven)**

[ONLY IN DK] The Danish act on supplementary provisions to the EU Regulation on the protection of natural persons with regard to the processing of personal data and on the free movement of such data (Act No. 502 of 23 May 2018).

**User Data** The term "User Data" is used to described data for a user with a login profile.

**Anonymous user** The term "Anonymous user" is used to describe a not-logged-in user.

**4. About this policy**

The purpose of this privacy policy is to inform you about the way your personal data is handled and protected by ECO in accordance with the [General Data Protection Regulation EU 2016/679](#).

This policy cover your visit/use of ECO digital platforms.

**5. What information do we collect?:**

As a general rule, we collect no Special Categories of Personal Data (sensitive data) about you.

You can either visit us as an anonymous user or as a logged-in user with a profile. We know more about you when you are logged in to our systems, and more data is therefore collected.

Besides data for anonymous visits, we also collect the following data when you have a profile on our platforms:

Name, title, username, password, email address(es), organisation details (name, address etc.) , telephone number(s), profile picture, indication of representation, group membership including group-mail participation, meeting registration (meetings you participate in) and any replies to questionnaires you may participate in.

**6. Anonymous user**

When you visit us without logging in to our system, you are an anonymous user. ECO collects the following data:

IP Address, type of device, identification of unit accessing websites, browser type and settings, operating system, referring website (the webpage you are coming from before you enter ECO websites), country, pages visited on ECO sites, time of visit, length of visit and number of visits and your current location if possible (based on nearest town from your IP address).

Please be aware IP addresses are at times registered to a specific organisation, in which case we also register this information.

**7. How do we process your data and what legal basis do we have ?:**

When you visit - you leave a footprint on our systems called an IP address, and your browser sends us various data on its settings and capabilities. These data we collect automatically in a statistics system for further analysis. These are collected even if you are not logged in with a profile.

If you create a user profile to be able to access the secured part of our systems, we ask you to fill out a form containing data we need to serve you the best.

If you enter to answer a questionnaire, these data are collected by submitting a form.

Some of our systems do not provide you with the possibility to edit your personal profile, and login is only required to upload data, in these cases we collect personal data by telephone conversations or email exchange.

<b>Show of content</b>	ECO digital platform is publicly open to anyone in need of the information we provide.	<b>Perform responsibility</b> ECO has a legitimate interest that the user is able to use our digital platforms.
<b>Analytics Data / cookies</b>	ECO uses user-analytics to enhance our digital platforms. Also we catch errors in our system based on your user data, and to make sure there is adequate resources on our systems for when they are most used.  We use a partner to provide us with the service of user analytics, and these data are sent to their systems as part of your visit to our systems.	<b>Legitimate interest</b> ECO has a legitimate interest in developing our digital platforms, and for that we need statistics about usage patterns and users details.
<b>Personalisation</b>	To optimise your experience when online the website will adapt your view in menus etc. to your profile, and will grant you access to closed groups and meetings based on your membership.  To visit our sites, you are not required to create a profile, however some parts of our sites are restricted to membership of individual groups, and you may not be able to see all content without a profile.	<b>Legitimate interest</b> ECO systems are user-centric, meaning the user will have to apply to the individual groups and applications are approved by a chairman or an administrator. The menu structure and functions will reflect the individual user's group memberships, and give access to notification options. It is not possible to enter groups for which a user is not member.
<b>Communications</b>	To send you emails from the system like when you subscribe to notifications, or when you reset your password. E-mails from group mailing lists.  Communication when participating in meetings. E-mails from our public mailing lists (i.e. ECC Newsletter )	<b>Legitimate interest</b> (only applicable for user with profile)  ECO has a legitimate interest in keeping the user updated when changes happen in activities the user is subscribed to. Also users will, when participating in group-mail or subscribing to our public mailing lists, receive mails from the system from other users subscribing to the same system but via mail systems at ECO.  We will also need to send emails to ask users to validate their profile information from time to time.
<b>Meeting registration</b>	We keep records of people attending meetings (both web meetings and physical meetings), these lists are open when the meeting to be held is public. If meetings are held within a group, the participant list is only open to members of the group.  Participant-lists can/will be printed and used for checking attendance and to	

	have a record of who is in the building as part of local fire regulations.	
<b>Documents and web articles</b>	Our websites are maintained by users and information is freely available, therefore articles and documents published - can contain personal details such as names, email addresses, pictures, organisations etc.	<b>Perform responsibility</b> Web articles and documentation are some of the ECO main products, and we have a legitimate interest to make these available to the widest possible extent.
<b>Questionnaire data</b>	ECO will at times publish a questionnaire to gather information administrations.  Questionnaire responses will contain personal data but access to them are restricted..	<b>Consent</b> When you answer a questionnaire, we take it for granted that you consent to the use of the data collected.
<b>Adhere to public law (national Danish data protection law and EU GDPR)</b>		<b>Business Obligation</b> ECO is required to uphold laws and regulations as all other business entities are.

**8. Transfer to data-processor outside EU**

ECO serves 48 countries both inside and outside EU/EEA, and will at times make data available outside the EU/EEA.

**9. Storage period**

Anonymous user data is stored for as long as we need them. More specifically we use anonymous data to make statistics and we generally review these after a five year term.

Profile data is stored for as long a user wishes to have a profile on our website.

Documents, web articles and meeting data are stored indefinitely for documentation purposes.

**10. How do we safeguard your data**

At ECO, our Processing of Personal Data is governed by our Information Security Policy. Our Information Security Policy also lays down how to carry out risk assessments and impact analyses of existing as well as new or changed Processing activities. We have implemented internal rules and procedures to provide and maintain appropriate security from collection to erasure of Personal Data, and we will only engage Data Processors to process our Personal Data if they maintain a similar appropriate security level.

ECO will never sell, rent or lease any personal information collected online or offline to third-parties. We may share your personal data with vendors working on our behalf when required to fulfil our business obligation to you or if required by law or to respond to legal process.

ECO uses secure data networks that are protected by firewall and password protection systems that are consistent with industry standards.

**11. Your rights**

You can at all times correct and update your profile data. If in any doubt please contact us by email on [dataprotect@eco.cept.org](mailto:dataprotect@eco.cept.org) with details, and we will assist you in updating these data.

At all times, you can ask for your profile data to be deleted. We can however not delete personal data contained in web articles and documents as well as meeting details as they are kept for documentation purposes.

If you need collective information about what personal data we have registered about you, you are welcome to send an email to [dataprotect@eco.cept.org](mailto:dataprotect@eco.cept.org) with the request. Please note we may ask for verification on who you are. As data has to be collected from various sources, there can be an extended delivery period. Please note we do not inform you of data inside documents and articles.

## **12. Children's privacy**

Our activities do not address anyone under the age of 13. We do not knowingly collect identifiable personal data from children under 13. In the case we discover that a child under 13 has provided us with personal information, we immediately delete this from our servers. If you are a parent or guardian and you become aware that your child has provided us with personal information, please contact us so that we will be able to take necessary actions.

## **13. Breach**

In case of data breach, we have established safety procedures to mitigate the breach quickly. In this process, we will alert the proper authorities as required by the law.

## **14. Cookies**

We use cookies or similar technologies to collect data about your use of our websites. Cookies collect small pieces of information that are stored by your browser on your computer's hard drive. We use cookies to capture information about your visit to our website for the following purposes only:

- for statistical or survey purposes to improve this website and its services to you;
- to provide you with this website content;
- to administer these websites.

Whilst our websites uses cookies, you can set up your browser to reject cookies and disable their use. Disabling cookies will not materially impact your interaction with our websites.

## **15. Complaints to the supervisory authority**

Any complaint about our Processing of your Personal Data may be submitted to the Danish Data Protection Agency:

The Danish Data Protection Agency, Borgergade 28, 5th floor, 1300 Copenhagen K, Denmark, telephone +45 3319 3200, email: [dt@datatilsynet.dk](mailto:dt@datatilsynet.dk).

## 16. Contact

You can at all times contact the office

Telephone number: +45 33 89 63 00,

or email [dataprotect@eco.cept.org](mailto:dataprotect@eco.cept.org).

In case of emergency you can contact IT Manager Kenneth Karlsson , +45 23 88 19 19, or Director Per Christensen.

We may change or update this statement in the future without prior notice to you in order to reflect changes in our practices related to personal data.

## Revision History

Date of change	Responsible	Summary of change
03.09.2018	KK	Version 1 - initial release