



1. *Who are we (the "Data Controller")*

The European Center for Not-for-Profit Law Stichting (ECNL) is the data controller of any personal data (in other words, the organisation which is responsible for the processing of your personal data and determines how your personal data is used). Our contact details are as follows:

Name: European Center for Not-for-Profit Law Stichting (ECNL)
Registered address: Riviervismarkt 5, 2513 AM, The Hague, The Netherlands
Company registration number: 73239518
Telephone: +31 6 390 29 805
Website: <http://ecnl.org>
Twitter page: <https://twitter.com/enablingNGOLaw>

2. *Purpose and term of the Privacy Notice:*

This Privacy Notice is designed to help you understand what data is processed by European Center for Not-for-Profit Law Stichting (ECNL Stichting) as data controller (hereinafter: ECNL), It describes the personal data ECNL processes during the course of services offered by our organisation and the ways the personal data is used. Please read this document carefully as it will help you to understand the ways that ECNL uses personal data and its reasons for doing so.

3. *Legal background to the Privacy Notice:*

ECNL processes data and ensures the protection of the data in accordance with its own internal privacy policy, and the The General Data Protection Regulation (GDPR or Algemene Verordening Gegevensbescherming (AVG) in Dutch).

4. *General principles of data processing:*

ECNL is committed to processing your personal data in accordance with applicable data protection laws and ECNL will perform any data processing whilst complying with the following principles:

- **Lawfulness, fair processing and transparency:** Personal data must be processed lawfully, fairly and in a transparent .
- **Purpose limitation:** Personal data may only be collected for a specified, explicit and legitimate purpose and not processed in a manner incompatible with this purposes.
- **Data minimisation:** Personal data may only be processed if adequate, relevant and limited to what is necessary in relation to the purpose.
- **Data quality (accuracy):** The personal data must be accurate, complete and kept up to date.
- **Storage limitation:** Personal data must be kept for no longer than is necessary for the above-mentioned purpose.
- **Integrity and confidentiality:** ECNL will ensure there is appropriate security to protect the personal data against unauthorised or unlawful processing and against accidental loss, destruction or damage using appropriate technical or organisational measures. **Accountability:** ECNL is responsible for, and must be able to demonstrate compliance with the above-detailed principles and aspects of data processing.



5. *Data processing and data transmissions:*

This Notice provides information relating to the following processing activities. The processing is performed in accordance with ECNL's own internal policy and in accordance with the provisions of the The General Data Protection Regulation (GDPR or Algemene Verordening Gegevensbescherming (AVG)) applicable statements adopted by the The Dutch Data Protection Authority (Autoriteit Persoonsgegevens).

- I. Data processing related to activities pursued online and/or offline
 - When you contact us or make an inquiry
 - Cookies
 - Data processing related to the use of electronic hosting
 - Data processing realised to maintain contact with customers
- II. Data transmission

a) When you contact us or make an inquiry

In addition to contact via phone, customers can request information from ECNL (inquiry) primarily via the post or by electronic means (email). Primary contact details of ECNL are its mailing address and email address specified in section 1 of this Notice, which correspond to those posted on ECNL's website at <http://ecnl.org/contact/>. In the inquiry, the data subject may choose to provide his/her email address and first and/or last name(s) by writing these in the letter heading or making the sender's email address visible to ECNL.

The primary purpose of processing is to identify the interested person or customer so that ECNL can contact him/her with regard to the inquiry. ECNL processes personal data received in this way separately, in a closed manner, and may only store them on paper if the inquiry has also been made on paper. Inquiries received electronically must be stored electronically, and will only be printed if it is necessary for the applicable record management requirements. If the request is not received in an email but via the post (on paper), processing occurs according to the way the request was sent: if the request is received at the mailing address in hard copy, the requester's name, or if indicated on the envelope or in the letter heading, the sender's data (sender's name and address) are to be regarded as the processed personal data.

ENCL will process personal data thus received until the realisation of the purpose, i.e. until the request is responded to, while in the case of on-going communication (correspondence) until finalisation of the communication but, in any case, no longer than the 14th calendar day from sending the last letter.

ENCL does not process inquiries received in any way other than the above (e.g. via Twitter or other online interface). Such inquiries are deleted as soon as technically practicable after learning of their submission/receipt without a reply.

If you engage with ECNL or contact ECNL on one of its social media platforms (such as Twitter or LinkedIn) (for example, by mentioning ECNL or tagging ECNL in a post, contact ECNL directly or post on ECNL's page) ECNL will process your details (such as your twitter handle or username and any personal data in your message) so that it can respond to any comments or queries you have. ECNL relies on its legitimate interests to do this to provide a high quality experience to its customers and members. For more information about how personal data is processed on social media platforms please refer to the social media privacy policy.

Data processing via information request (inquiry):				
Personal data	Purpose of processing	Legal ground of processing	Source of data	Duration of processing
First and last name	Serves the purpose of identification and the maintenance of customer contact	Legitimate interest of ECNL to communicate and meet the needs of customers (Collected directly from the data subject (normally contained in the inquiry)	Until realisation of the purpose, but no later than the 14 th calendar day from the last correspondence

		ECNL will always ensure that your rights are protected)		
Email address or the sender's details	Serves the purpose of identification and the maintenance of customer contact	Legitimate interest of ECNL to communicate and meet the needs of customers (ECNL will always ensure that your rights are protected)	Collected directly from the data subject (normally contained in the inquiry)	Until realisation of the purpose, but no later than the 14 th calendar day from the last correspondence

b) Cookies

To ensure customised service and to track user habits, ECNL sends small pieces of data called cookie to the user's computer and re-reads them: cookies are small data files posted to the user's computer by the website visited. The cookie serves to facilitate the specific info/communication or internet-based service and to do it more comfortably

Generally, cookies can be classified into two main groups. Temporary cookies, which are posted by the website only for the duration of the on-going session (e.g. during security identification in internet banking), and permanent cookies (e.g. the language settings of a website), which remain on the computer until the user deletes them.

Generally, cookies serve to save preferences and information provided by the users, e.g. a basket in a webstore, and provide anonymous data to third parties as seems reasonable from a data processing perspective. Cookies based on the user's consent may not be installed until the website operator obtains the necessary consent.

The data subject may choose to disable the authorisation of cookies on ECNL's website. The easiest way to do this is to disable cookies via ECNL's own browser. The users may find further information on the role of cookies on the website of the European Interactive Digital Advertising Alliance, which is available in English language at the website <https://www.aboutcookies.org/>.

ECNL applies a cookie on its website located at <http://ecnl.org> and its subpages; more specifically, it applies **Google Analytics**. This cookie generates information about how users use the website and generates statistical data for the purposes of maintaining and improving our website.

In addition to this cookie, ECNL's website uses the cookie named Amazon Web Services Elastic Load Balancing (AWSELB) via the NGO Source file ("Badge"), which transmits the users' requests to the server. The primary aim of the cookie is imperative. The user may find information on this cookie at the following link: <https://cookiepedia.co.uk/cookies/AWSELB>.

The objective of using and handling cookies is to identify the users' current session, to save data provided during the session and to prevent data loss in order to measure the success of user communications.

Data processing related to the application of cookies:				
Data category	Purpose of processing	Legal ground of processing	Source of data	Duration of processing
Cookie	Identification of the users' current session, saving data provided during the session, preventing data loss in	Legitimate interests of ECNL to ensure that its website works properly and	ECNL's website	Until termination of the session.

	order to measure the success of user communications.	that the website content is of high quality. ECNL will always make sure your rights are protected.		
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c) Data processing related to the use of electronic hosting

ECNL engages with various third parties to provide services for specific functions where ECNL does not have the capacity to perform them internally. For example, as ECNL does not possess a server, some personal data are obtained by ECNL electronically using services provided by the respective web hosting companies. Data is stored on Network Attached Storage and data backups occur at specified intervals, which are located electronically via a cloud service. Cloud service for backups is provided by Microsoft Azure.

ECNL also performs processing via the Google Drive application in the following cases:

- In the course of registration for events
- Sharing files

Obviously, ECNL grants access for the external IT operator company to the relevant electronically stored personal data, while another IT company performs spam filtering based on a contract made with ECNL. Email service is operated by an IT company appointed by ECNL's parent company. Their names and addresses are contained in the annex of its internal policy (list of third parties).

ECNL only works with service providers it trusts to take care of personal data appropriately as required by applicable laws.

Data processing related to the application of electronic hosting and third party processing:				
Data category	Purpose of processing	Legal ground of processing	Source of data	Duration of processing
Information for the registration of events and general data backups	The hosting of a server (on behalf of ECNL by and third party) and backups.	Legitimate interests to request third party processes to perform certain actions it is unable to perform itself. In this instance the legitimate interest of ECNL to information is hosted safely. ECNL will always make sure your rights are protected.	ECNL's website/ECNL files	Varies according to the service being provided to ECNL. For more information please contact ECNL using the details in section 1 of this policy.

d) Data processing performed to maintain contact with customers

ECNL will keep electronic records of its customers' contact details, i.e. the availability data of all individuals (whether they proceed on behalf of or in the representation of a legal person or in his/her own name) with whom it gets into contact while organising an event or performing a project within its own system for the purpose of maintaining customer contact and communication. As a part of this processing, ECNL processes the first and last

names, email addresses and phone numbers of the data subjects. In this case, ECNL processes the titles and positions of data subjects and the names of legal persons represented by them. ECNL processes the data within its own IT system, which is only accessible to authorised employees and is not publicly accessible.

ECNL obtains the data processed in this way from public sources, completed electronic forms, submitted information requests and attendance lists .

ECNL processes the personal data concerned with the consent of the data subjects, by maintaining a database. The consent is procured in different ways:

- By filling in the forms, the data subjects have the possibility to declare that they have studied the rules of processing and accept that ECNL may process their data provided accordingly.
- At events where the data subject provides his/her personal data personally in writing, by filling in an attendance list, ECNL will obtain a written statement on the provision of personal data so that the attending data subjects can learn the rules of processing and accept that ECNL may process their data accordingly.
- At personal meetings, ECNL will enter the data displayed on business cards handed over by the individuals representing legal persons to its own system in the appropriate manner.
- In the course of electronic correspondence and exchange of letters ECNL will enter the sender's data into its own system in the appropriate manner.

In addition to the data listed below, the Controller will not process or keep records of any other personal data collected and processed in the course of the customer relationship.

Data processing performed to maintain contact with customers				
Personal data	Purpose of processing	Legal ground of processing	Source of data	Duration of processing
First and last name	Contact maintenance, communication with customers	The data subject's consent	Collected directly from the data subject	Until erasure upon the data subject's request
Email address	Contact maintenance, communication with customers	The data subject's consent	Collected directly from the data subject	Until erasure upon the data subject's request
Telephone number	Contact maintenance, communication with customers	The data subject's consent	Collected directly from the data subject	Until erasure upon the data subject's request
Title, position	Contact maintenance, communication with customers	The data subject's consent	Collected directly from the data subject	Until erasure upon the data subject's request
Represented body	Contact maintenance, communication with customers	The data subject's consent	Collected directly from the data subject	Until erasure upon the data subject's request

6. Security of your personal data:

ECNL will ensure that appropriate technical and organisational measures are taken against unlawful or unauthorised processing of personal data, and against the accidental loss of, or damage to, personal data and has in place procedures and technologies to maintain the security of all personal data from the point of collection to the point of destruction

7. *Retention of your personal data:*

ECNL will only retain your personal data for as long as is necessary for the purposes described in this privacy policy. Retention periods are unlikely to be uniform as the time ECNL needs to retain your personal data will vary according to the type of the data and the purpose of the processing. For more information about the periods ECNL retains personal data for please refer to the tables above. If you would like further information about how long ECNL retains your personal data please contact us using the details at part 1 of this policy.

8. *Rules of data processing:*

Right of data subjects:

I. The law gives data subjects certain rights in connection with their personal data which is processed by ECNL as the controller. You have the right :

- a) to ask us not to use your personal data for direct marketing purposes;
- b) to receive information about how we process your personal data and request to receive a copy of your personal data (right of access) (and in some circumstances you can ask ECNL to provide a copy to a third party);
- c) to request that ECNL rectifies or supplements your personal data when it is incomplete (right to rectification);
- d) to request to have the processing of your personal data restricted or to ask ECNL to temporarily stop using your personal data in certain circumstances (right to restrict data processing);
- e) to request that ECNL erases your personal data from its systems in some (but not all) circumstances where there is no good reason for ECNL to continue to use it (right to erasure); and
- f) to not be subject to decisions made solely on the basis of 'automated processing' (i.e. the right not to be subject to decisions made solely by algorithms or computers without input from a human) in certain circumstances.

To help ECNL facilitate the exercise of your rights ECNL may provide you with templates so that we know how best to support your request. If you have any questions in relation to the exercise of your rights please contact us using the details at part 1 of this policy.

9. *Right to complain to a supervisory authority:*

Whilst we hope we will be able to help you with any concern or complaint you might have concerning your personal data, you also have the right to lodge a complaint with a supervisory authority.

In the Netherlands you may turn to the Dutch Data Protection Authority (Autoriteit Persoonsgegevens) with any complaint in connection with the processing:

Name of the authority:	Dutch Data Protection Authority
Abbreviated name of the authority:	(Dutch DPA)
Registered address:	Bezuidenhoutseweg 30, 2594 AV Den Haag
Website:	https://www.autoriteitpersoonsgegevens.nl/en
Phone:	(+31) - (0)70 - 888 85 00

10. *Closing provisions*

In issues not regulated in this Notice, the provisions of the Privacy Act in effect at that time and the other laws listed in Section 3 of this Notice shall be governing. Courts, public prosecutors, law enforcement agencies, authorities dealing with administrative offences, the Dutch National Authority for Data Protection and Freedom of Information and other bodies authorised by law may send inquiries to the controller to request the provision of information and the disclosure or transmission of data or documents.

ECNL reserves the right to unilaterally amend this privacy policy and ECNL will update this policy whenever it makes changes to the way your personal data is processed. In some circumstances where we feel it is important to do so we may notify you of any changes but we advise that you check this privacy policy frequently to see any updates.