ALDA Privacy Policy

This "Privacy Policy" regulates the processing of your personal data by the controller: ALDA – Association of Local Democracy Agencies, headquartered at Strasbourg, Maison des Associations, Place des Orphelins 1/A, 67000 Strasbourg, France, and registered in the Register of Associations of the Strasbourg District Court (hereafter referred to as: "ALDA").

Please read through this Privacy Policy carefully, since it contains your rights and duties vis-à-vis ALDA.

This Privacy & Cookie Policy can be reworked or updated from time to time, and so we recommend that you consult it again on a regular basis.

1 EU GDPR and data controller

ALDA, by means of the present Privacy Policy, also puts itself into compliance with the European Regulation 2016/679 of 27 April 2016 on the protection of personal data.

The controller of your personal data is ALDA.

2 Personal data collected

2.1 During a visit to this Website:

- IP address
- Browser and device of navigation
- Via cookies: read our Cookies policy, below

2.2 When registering for our newsletter:

- E-mail address
- Name and surname
- Country
- Language of newsletter (English, French, Italian, Serbian, Russian, Arabic)
- Data about newsletter opening and clicks by receivers, together with data on IP and browser/device used.

2.3 As ALDA members:

• Name and surname, gender, e-mail address, organization, job title, city, country, telephone number, subscription to ALDA's working groups

2.4 As staff, consultants, or other business relation:

 Name and surname, CVs, e-mail address, telephone number, address, bank account number, taxes and payments related information, and all data included in the specific agreement/contract (data collected in line with the specific needs and requirements)

3 Personal data that we collect indirectly

3.1 Public data of the principal, customer or some other business relation

ALDA sometimes processes public data, e.g. data that are subject to a publication duty, such as the publication of your appointment as director of a company, or data that you made public yourself, such as information posted on your website, or data that are generally known in your region or that have appeared in the press.

4 Purposes of the processes

The personal data treated are collected as provided by the stakeholders based on their will or on contracts/agreements.

ALDA uses data collected to:

- 2.1 Analyse and measure aggregated data on website navigation and include it in anonymous statistics, from which the identity of specific persons or companies cannot be discovered, with as legal basis the legitimate interests of ALDA in continuously improving its Website and provision of services;
- 2.2 Sending you e-mail and electronic messages, newsletters, or information on activities, events, opportunities for cooperation; and measure aggregated data on newsletter navigation
- 2.3 In order to be able to provide you the requested services and to comply with the statutory provisions, with as legal basis the execution of an agreement that was requested by you
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You are not obliged to release ALDA your personal data, but you do understand that the granting of certain services becomes impossible if you refuse the processing.

Treatment of data will be performed normally in ALDA's offices, from staff or external designated consultants. More information can be requested at data@aldaintranet.org

Specific safety measures are in place to avoid any loss of data, as well as illegal or non-authorized access/use of data.

4.1 Transfer to third parties:

ALDA will never pass on your personal data to third parties, with the exception of technical service providers who handle technical support in so far as this is necessary for the technical provision of services and/or if they are obliged to do so on the basis of a statutory provision or a judicial ruling.

ALDA shall make reasonable attempts to inform you in advance of the fact that ALDA discloses your data to named third parties, but you also acknowledge that this is not technically or commercially feasible under all circumstances.

ALDA will not sell your personal data, rent them out, share them or otherwise make them commercially available to third parties, except as described above or unless with your prior consent.

4.2 Legal requirements:

In rare cases, it could happen that ALDA must reveal your personal data subject to a court order or in order to comply with other compelling laws or regulations. ALDA shall make reasonable attempts to inform you in advance about this, unless it is subject to legal restrictions.

5 Duration of the processing

The personal data are kept and processed by us for a period of ten years, in line with the long-term framework of multiannual projects lifespan and following audit-related timeframe.

The aforementioned personal data are in any case kept in accordance with the specific statutory provisions, as well as the prescription periods that oblige us to maintain your personal data for a longer period, e.g. in order to defend ourselves against an action at law.

6 Your rights

You have the right - at any time, free of charge - to take cognisance of your personal data, as well as of the use that ALDA is making of your personal data.

In particular, you have the right to obtain from ALDA information about:

- the origin of personal data;
- the purpose and methods of treatment;
- of the logics applied in case of treatment carried out with the aid of electronic / IT tools;
- the identification details of the data manager, and delegate for data protection;
- the stakeholders and categories of stakeholders to whom the data may be communicated or who can learn about them as appointed representative.

Furthermore, you have the right to ask ALDA:

- updating, rectification or integration of their data;
- correction, deletion, restriction, transformation into anonymous form or blocking of data processed in violation of the law;
- access to their data, that is, the confirmation that a personal data processing concerning them is being processed;
- treatment limitation,
- the portability of the data, that is the right to receive in a structured format the personal data concerning him;
- right of complaint to the Data Protection Authority.

Finally, you have the right to object, in whole or in part, for legitimate reasons to the processing of personal data concerning yourself, even though they are relevant to the purpose of the collection. In particular, you have the right to object to the processing of personal data for the purpose of sending commercial advertising or direct sales material or for carrying out market research or commercial communication.

The requests referred to in the previous points must be sent to data@aldaintranet.org

ALDA reserves the right to modify, supplement or periodically update this policy in compliance with applicable legislation or the measures adopted by the French Authority for the Data Protection. The updated policy will be available on our website.

We invite users to view the Privacy Policy regularly, to check the updated information and decide whether or not to continue to use the services offered.

Applicable law

This Privacy Policy is governed by, interpreted and executed in accordance with French law, which is solely applicable.

7 ALDA Cookie policy

What are cookies?

A "cookie" is a small file composed of letters and numbers which is sent out and installed on your browser or on the hard disk of your computer. Data by cookies are transferred onto your hard disk and archived in your browser cache memory. When you navigate on our website, we may send you one or more cookies, to identify it. All data gathered will be analysed as aggregated data, in anonymous form.

Why do we use cookies?

ALDA's Website uses cookies and similar technologies in order to distinguish your use preferences from those of other users of our Website. This helps us to offer you a better user experience when you visit our Website and also allows us to optimise our Website.

As a result of recent legal changes, all Websites that target certain parts of the European Union are obliged to ask for your consent to use or save cookies and similar technologies on your computers or mobile devices. This cookie policy gives you clear and complete information about the cookies that we use and their purpose.

If you refuse to use cookies, you may not be able to fully access and use interactive functionalities and services of our website relying on cookies. For further information on how cookies management, you may refer to the documentation of your internet browser.

Types of cookies:

Technical cookies:

Some technical cookies are necessary for the full functioning of the website and it is therefore advised not to disable these cookies. They are not stored directly on our website nor are they directly accessible from our website. These cookies are necessary for browsing and do not contain personal data other than your IP address, necessary for surfing the Internet. They are necessary to assist the user in navigating the website or to return to the previous page. You can check these cookies via the parameters of your browser, but if you refuse cookies, this may hinder the correct operation of our website.

Tracking cookies:

We use tracking cookies (or analytical cookies) from Google Analytics to collect information on surfing behaviours of visitors on our website.

This information is extremely useful to improve our website and solve problems. Visitors' IP address is among the information tracked, but data collected are analysed and treated strictly in anonymous statistics. You can disable it in different ways depending on the browser you are using (forms and extensions of third parties, blocking the website www.google-analytics.com).

Functional cookies:

We use functional cookies which remember the choices you have made on our website, the pages viewed, etc. This information is stored only on your workstation and we use it only anonymously.

We will do everything possible to satisfy your preferences. However, it may happen that a cookie that you do not want to use is used. Therefore, we recommend that you change your cookie settings on your Internet browser using the "Help" function. Most browsers are initially set to accept cookies, but you can set your browser to reject all cookies or to indicate when a cookie is being sent. You can also delete cookies that have already been inserted. Note that you need to change the settings separately for each browser and computer you use. It is possible that some features and services on our and other websites may not function properly if cookies are disabled in the browser.

Social plug-in tracking cookies:

Are used to offer social media modules on a website, such as a Facebook like button or the possibility of retweeting a message.

For cookies installed by third parties, we are happy to refer you to the declarations that these parties make about this on their respective websites. Note: we exercise absolutely no influence on the content of these declarations, nor on the content of the cookies of these third parties: <u>Google</u> Analytics

Your consent

You can refuse or block cookies by changing the configuration parameters of your navigation system. Switching off cookies can mean that you can no longer make use of certain functionalities of the Website.

Should you have further questions or comments with regard to the processing of your personal data, please do not hesitate to contact us by post to

ALDA, c/o Maison des Association, Rue des Orphelins 1/A, 67000 Strasbourg, France

You can also find more information about cookies at: http://www.allaboutcookies.org/

Latest updated on: 15/05/2018