



## Data Privacy Policy in accordance with the EU General Data Protection Regulation (EU) 2016/679

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*Glass for Europe is a registered organization on the European Commission's register of interest representatives under the ID number 15997912445-80.*

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**Glass for Europe** is the trade association for Europe's flat glass sector. Flat glass is the material that goes into a variety of end products, primarily in windows and facades for buildings, windscreens and windows for automotive and transport as well as solar energy equipment, furniture and appliances.

Glass for Europe brings together multinational firms and thousands of SMEs across Europe, to represent the entire building glass value-chain. It is composed of flat glass manufacturers, AGC Glass Europe, Guardian, NSG-Group, Saint-Gobain Glass Industry and Siseçam-Trakya Cam, and works in association with national partners gathering thousands of building glass processors and transformers all over Europe.

## **GLASS FOR EUROPE**

**International Non Profit Association, A.I.S.B.L.**

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Brussels, 2 May 2018

It is Glass for Europe's policy to respect and treat with utmost confidentiality all personal data that it was handed over and that it processes. To give core to this commitment, the below data privacy policy has been established and governs the manner in which Glass for Europe uses and processes personal information and data. It also informs about data privacy rights (see section 7) that individuals can exercise at any-time.

### **1. Type of Personal Data**

In your dealings with Glass for Europe, you may provide us with personal data information. This information may include name, surname, gender, professional function, email address, address, phone number(s), employer, subscription to mailing lists, registration to events and attendance to Glass for Europe meetings. Glass for Europe may also have collected additional information such as individual photos, pictures and videos taken at meetings, statements made during meetings and any other data necessary for participating to external meetings, relevant for administrative purposes or required by law.

Some of this data may be considered as personal data under the EU General Data Protection Regulation (GDPR) – regulation EC 2016/679. Glass for Europe's self-assessment is that most data it collects present limited risks for your fundamental rights considering that only professional information is used and that adequate measures are in place to avoid data breaches.

### **2. Methods of Personal Data Collection**

In most instances, Glass for Europe collects personal data directly from the data subjects or from their employers, in the case of member companies and partner organisations. Personal data may sometimes be obtained through other means such as interaction on the website of Glass for Europe, registration and participation to meetings and events and subscription to Glass for Europe newsletters.

Glass for Europe does not use any Third-Party service provider habilitated to collect personal data on its behalf. It may however use public sources, such as the directories of the European Institutions. In the event that Third-Party provider is contracted by Glass for Europe to collect personal data in the future, Glass for Europe will make sure contractually that the Third-Party concerned is required to use your personal data in accordance with the provisions of this Privacy Statement.

### 3. Purpose of use and processing of personal data

The information provided to Glass for Europe is primarily used and processed for membership management and the fulfilment of Glass for Europe's missions. Specifically, it is used for contacting you, keeping you informed about the activities of the association (newsletters or working groups mailings lists), responding to questions or asking questions or for any other purpose of communicating with you for the purpose of fulfilling the missions of the association.

For the purpose of fulfilling its communication and advocacy activities, Glass for Europe processes contact details of journalists, officials from the European Institutions and Member States of the EU, Members of the European Parliament, academics, consultants as well as industry and non-governmental organisations stakeholders. Glass for Europe's use of 'mass' communication tools is limited to one quarterly newsletter, the occasional sending of press releases, a potential invitation to an event and a few occasional communications. The latter are always not commercial and are limited and focused in distribution. Glass for Europe endeavors to obtain and archive a prior and informed explicit consent of recipients of information sent by way of mass communication channels. The possibility of withdrawing the prior explicit consent can be exercised at any time (see section 7).

Other information is used for fulfilling administrative tasks and for complying with legal obligations. This may include for instance your attendance to meetings or statements made during meetings, which are used for drafting minutes of meetings. For members of the Board of Directors of Glass for Europe, it also includes additional personal information such as home address, birthdate, copy of ID cards, for the purpose of publication to the Belgian Official Journal (*Moniteur Belge*) of the list of administrators.

It is Glass for Europe's understanding that the above purposes of data use fall within the 'legitimate interests' of Glass for Europe. Glass for Europe commits to strictly limit its data and information collection to this type of legitimate interests.

### 4. Disclosure of personal data to Third-Parties

Glass for Europe shall under no circumstance sell your personal data to Third-Parties or share it for commercial gain. It may however need to disclose your personal data to Third-Parties for the fulfilment of its activities. This may include sharing the contact details of members with other members, for example between participants to a working group, or sharing the birthdate and ID card number with the European Institutions for security checks prior to entering the European Institutions' premises.

It is also possible that Glass for Europe is obliged to disclose your personal data to public authorities as required by laws or regulations.

### 5. Cross-border processing of personal data

Any transfer of personal data outside the European Economic Area (EEA) to a recipient whose domicile or registered office is in a country which does not fall under the adequacy decision enacted by the European Commission shall be governed by the provisions of a data transfer agreement, which shall contain i) the standard contractual clauses as referred to in European Commission

Decision 2010/87/EC, or ii) any other mechanism pursuant to privacy legislation, or any other regulations pertaining to the processing of personal data.

## 6. Storage of personal data

The personal data of employees of member companies and partner organizations of Glass for Europe is stored for the duration of their employer's membership in Glass for Europe except in cases where Glass for Europe is notified that the said employee has left the organization. In that case, the personal data of employees is deleted at the latest 6 months of Glass for Europe receiving the said notification.

Minutes of meetings, lists of participants and correspondence with members are kept for a duration of 10 years for demonstration of compliance with competition law.

All other personal data is kept for the time strictly necessary to achieve the purpose(s) for which they were collected.

## 7. Your Privacy Rights

At any time, you may exercise the following rights with regards to your personal data processed by Glass for Europe:

1. Right of access to personal data
2. Right to rectification, completion or updating of personal data
3. Right to delete personal data ("right to be forgotten") and
4. Right to unsubscribe to newsletters and other communication in case no further involvement is wished with Glass for Europe (e.g. in case of change of position / responsibilities).

The point of contact for individuals to exercise the above rights with regards to their personal data is Glass for Europe's Data Protection Officer:

Isabella Petrucci - +32.2.548.43.77 – [isabella.petrucci@glassforeurope.com](mailto:isabella.petrucci@glassforeurope.com)

## 8. Security of personal data

Glass for Europe undertakes to take all reasonable, physical, technological and organizational precautions in order to avoid (i) unauthorized access to your personal information and (ii) loss, abuse, or alteration of your personal data. Notwithstanding the above, an infallible level of security can never be guaranteed. Should any data breach occur, it will be communicated to the Privacy Commission of Belgium as required by law.

Glass for Europe shall store all personal data, which it has collected, on its own servers or on those of service providers located in the European Union or in so-called Safe Harbours in Third Countries. Paper records shall be stored in the offices of Glass for Europe.

All the staff of the Glass for Europe secretariat has been and will continue being kept informed about the principles of the regulation EC 2016/679 and the subsequent internal procedures for the management of personal information and data. Glass for Europe's Data Protection Officer is:

Isabella Petrucci - +32.2.548.43.77 – [isabella.petrucci@glassforeurope.com](mailto:isabella.petrucci@glassforeurope.com)

## 9. Website and social media

To access and navigate websites of Glass for Europe, there is no need to provide any personal data. Personal information will only be collected when users send a query to Glass for Europe through the content form. Personal data will only be used by Glass for Europe to administer the service requested. However, because these websites use Google Analytics to quantify and evaluate the use of web pages, a number of pages use cookies. Enabling these cookies is not strictly necessary for the website to work but it will provide a better browsing experience. Users can delete or block cookies. The cookie-related information is not used to identify users personally. More information on Google Analytics is provided in the Data Privacy Policy pages of Glass for Europe's websites.

When interacting on the Glass for Europe's social media platform accounts (Twitter, LinkedIn, Facebook, Google+ and YouTube), your personal data consent and use are covered by the terms and conditions of the relevant social media platforms.

Glass for Europe's Data Privacy Policy applies only to Glass for Europe's databases, websites and communications. When you land on external websites or platforms of third parties, even by way of links provided on Glass for Europe's channels, Glass for Europe's data privacy policy ceases to apply.

## 10. Update of the Data Privacy Policy

Glass for Europe is entitled to update this Data Privacy Policy as and when it deems it necessary. Any such changes will be notified to registered contacts and posted on Glass for Europe's websites Data Privacy Policy pages.

## 11. Contact

The point of contact for individuals wishing to exercise their rights with regards to their personal data is Glass for Europe's Data Protection Officer: Isabella Petrucci - +32.2.548.43.77 – [isabella.petrucci@glassforeurope.com](mailto:isabella.petrucci@glassforeurope.com)

In case of questions about this Data Privacy Policy, please contact Glass for Europe's Data Protection Officer: Isabella Petrucci - +32.2.548.43.77 – [isabella.petrucci@glassforeurope.com](mailto:isabella.petrucci@glassforeurope.com).

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