

IFRRO Privacy Policy

1. Introduction to IFRRO

The International Federation of Reproduction Rights Organisations, AISBL ("IFRRO") is an independent, non-for-profit organisation, established in 1984. IFRRO is the international network of collective management organisations and creators' and publishers' associations in the text and image spheres. Collective Management Organisations in this area are known as Reproduction Rights Organisations (RROs). IFRRO's mission is to develop and support an efficient and effective network of collective management organisations around the world, including RROs, to ensure the copyrights of authors, visual artists and publishers are respected when their works are reproduced and used. It does this by advocating for copyright and the creative sector and by building a strong and resilient RRO network that supports the rights of creators and publishers, including economic and moral rights.

IFRRO provides general information to support members in their business strategies and helps to facilitate the exchange of ideas, best practice and knowledge. IFRRO also provides collective representation for its member organisations and raises awareness about their activities. Through its collaborative partnerships and the expertise of its members, IFRRO supports new RROs and mentors existing ones. It also works to enable users such as libraries and persons with print disabilities to access and use the works they need. More details about IFRRO, its membership and its activities are available on the IFRRO website: www.ifrro.org

2. Personal data and privacy

In order for IFRRO to fulfil its mission, we process personal data which relates to our members, as well as other contacts. This privacy policy provides details about the personal information (hereinafter "**the data**") that IFRRO ("**We**") collect from our members', potential members and other data subjects (i.e. IFRRO's suppliers, service providers, external consultants, third party contacts, etc.) ("**You**"), how and why We use your data and your rights to control personal information We hold about you.

The concept of "data" encompasses all the personal data relating to yourself and more specifically any information that allows us to directly or indirectly identify you as a natural person.

We recommend that you read this privacy policy carefully in order to understand our practices in the processing of your data and to be informed of the last version of this privacy policy.

The protection of your data and your privacy is of great importance to us and we are therefore committed to ensuring this protection by complying with data protection laws, including the Belgian Privacy Act of 8 December 1992 and the European Regulation 2016/679 of 27 April 2016 on the protection of personal data (the "**GDPR**") and any other implementing act or regulations.

3. Who is the data controller?

The data controller responsible for the processing of your data is IFRRO, having its registered office at Rue du Prince Royal 85-87, 1050 Ixelles, and registered in the register of the Crossroads Bank for Enterprises (CBE) under number 0464.622.872.

As a data controller we solely and autonomously determine the purposes of the processing of your data as well as all corresponding criteria.

4. What data do we process?

In the course of our business activity, we may process various information and data relating to you. We describe hereunder the categories of data that we process, together with some examples.

4.1 Data relating to the members and candidate members

The data can be either provided directly by yourself or by a representative within your organisation.

(a) Identification data

We process the following personal identifying information about you:

- Name;
- E-mail address;
- Postal address;
- Phone and mobile phone numbers;
- Skype address;
- Home addresses;
- Other identification data you choose to provide to us.

(b) Transactional data relating to the execution of the contract

When we follow up with a request to become a member IFRRO and during the membership, we process the following data:

- Position held within the organisation;
- Application form;
- Biography of board members.

4.2 Data relating to third parties other than members and candidate members

(a) Identification data

We process the following personal identifying information about suppliers, service providers, external consultants and more broadly third party contacts:

- Name;
- E-mail addresses
- Contact details

(b) Transactional data relating to the execution of the contract

In the course of the performance of the agreement, we entered or we would enter with you, we process the following data:

- Contact details;
- Bank account details;
- Business cards details.

5. On which legal basis and for which purposes do we process your data?

We are authorised by law to process your personal data on the following grounds and for the following purposes. We ensure that the processing of your personal data is limited to what is strictly necessary for the achievement and performance of these purposes.

5.1 Compliance with our legal obligations

As an AISBL, we have to comply with numerous legal and regulatory obligations/requirements. We therefore process members' and candidate members' data, in particular, to:

- conduct and manage election procedures of the board;
- comply with legal obligations of transparency and send details of board members and auditors to the Moniteur Belge;
- comply with mandatory requirements regarding our bank accounts.

5.2 Performance of the contract of membership and effective relationship with members and candidate members

As a member or candidate member of IFRRRO, we process your data in order to ensure good performance of our services and an effective relationship between the federation and its members and candidate members. For these purposes, we process your personal data in order to:

- keep members updated with relevant information, including the information relating to IFRRRO and its members IFRRRO's directory and annual report, and sending e-mails to provide such information to members, using various distribution lists;
- organise and hold meetings, e.g., by preparing minutes and agendas;
- register members to congresses or other meetings;
- give grants to members and other beneficiaries (including, e.g., the cost of travelling and attending to meetings, etc.);
- manage loan agreements.

Generally speaking, IFRRRO may process the abovementioned data for other purposes where necessary for the performance of our services.

5.3 Performance of the contract with third parties other than members and candidate members

Some data we process about our suppliers, service providers, external consultants and more broadly third party contacts are necessary for the effective and successful performance of the contract we entered or we would enter with you. For these purposes, we in particular process your personal data in order to:

- perform the contracts and define the mission and services to be provided by the third parties;
- pay the third parties for the services provided to IFRRRO.

5.4 The legitimate interest of IFRRRO

As an AISBL, we may also process your data for the achievement and the realisation of our legitimate interests. To this end, we strive to maintain a fair balance between the need to process data and the preservation of your rights and freedoms, including the protection of your privacy:

- to manage the communication beyond the IFRRRO membership;
- to present IFRRRO, its members and its activities on its website and social media as, for example, on Twitter and LinkedIn;
- to publish newsletters and website stories;
- to draft, publish and distribute IFRRRO's annual report and directory;

- to make other publications.

5.5 Your consent for electronic communications

Subject to obtaining your prior consent in a specific way, we may process your personal electronic contact data, such as your email address or mobile phone number, in order to send you personalised information, advertisements or proposals, through direct marketing or newsletters.

6. With whom and how do we share your data?

We will not disclose, sell or rent your personal data to any third party, except as described in this privacy policy.

We may share personal data with affiliates or third parties who perform data processing activities on our behalf. As far as these service providers are acting as data processor, on our behalf, we do not authorise them to use or disclose the data in any way except as specified in this privacy policy. We require that these data processors appropriately safeguard the privacy and security of the personal data they process on our behalf.

We may disclose your personal information where we are required to do so (i) by applicable law, (ii) by a governmental body, (iii) by a law enforcement agency or (iv) in connection with an investigation of suspected or actual fraudulent or illegal activity.

IFRRO hereby draw the attention of its members on the prohibition to use and share the IFRRO's annual report and/or directory to any third party for any commercial purpose.

7. What are your rights?

7.1 Access, rectification, erasure, portability and objection rights

For all the purposes defined here above, and within the limits provided by applicable data protection laws, you have the following rights as a data subject:

- the right to ask us to provide you with copies of personal information that we hold about you at any time, which include the right to ask us: whether we process your personal data, for what purposes; the categories of data; the recipients to whom the data are shared;
- the right to ask us to update and correct any out-of-date or incorrect personal information that we hold about you free of charge;
- the right to withdraw your consent where such consent has been given, in particular when you have given your prior consent to receive personalised information and advertisements through electronic communications means;
- the right to erasure within the limits afforded by data protection legislation;
- the right to data portability within the limits afforded by data protection legislation.

Where we process your data for our legitimate interests, you have the right to object to the processing of your data. However, according to our legitimate interests, we may continue to process your data after a careful balancing of your interests with the ones of IFRRO.

7.2 Objection right to direct marketing

Should IFRRO decide to process your data for direct marketing purposes, you always have the right to opt-out, at first request and free of charge, of any direct marketing communications.

You can exercise your objection right by contacting IFRRO's Office Manager via email at secretariat@ifrrro.org, or telephone 0032 2 234 6260, or in writing at Rue du Prince Royal 85-87, 1050, Brussels, Belgium.

7.3 How to exercise those rights?

You may at any time exercise the abovementioned rights in accordance with data protection regulations, by sending a request with a copy of your ID card (passport or other proof of identity) to secretariat@ifrrro.org or in writing to Rue du Prince Royal 85-87, 1050 Brussels, and subject to complying with our reasonable requests to verify your identity.

7.4 Right to lodge a complaint

In the event of a conflict concerning the processing of your personal data, you can contact IFRRO's Office Manager via the following channels:

- By mail: Rue du Prince Royal 85-87, 1050 Brussels
- By email: secretariat@ifrrro.org
- By phone: 0032 2 234 6260

You can also lodge a complaint to the Belgian Data Protection Authority either by post at rue de la Presse 35, 1000 Brussels, or by e-mail at commission@privacycommission.be or by phone at +32 2 274 48 00.

8. How long do we keep your personal data?

We will not store your personal data beyond the time necessary for the performance of the purposes for which the data is processed. Specifically, we distinguish between a retention period and an archiving period:

- The retention period is the maximum period of use of your personal data for specific purposes:
 - the data processed for the execution of the contractual relationship is kept for the entire duration of the contract with the third party or the entire duration of the membership and for the prescription period upon termination of the contract;
 - the data processed for other purposes may be retained for a longer period during which we will reassess the need to keep this data and pseudonymise the data where it does not affect the realisation of the purposes.
- The archiving period meets our legal obligation as well as the legal need to retain your data beyond the retention period for evidentiary purposes or to respond to requests for information from the competent authorities.

9. How do we protect your personal data?

We take appropriate technical and organisational measures to safeguard and protect your personal data, against unauthorized or unlawful processing and against accidental destruction, loss, access, misuses, damage and any other unlawful forms of processing of the personal data in our possession.

10. How to contact us?

If you have any questions or comments about this privacy policy, if you would like to exercise your rights, or to update the information we have about you or your preferences, please contact Secretariat@ifrrro.org or telephone 0032 2 234 6260.