

# Privacy Policy

*Effective as of 25 May 2018*



## Introduction

The American Chamber of Commerce to the European Union ASBL (“AmCham EU”, “we” or “us”) particularly cares about data protection and your privacy in general.

The purpose of this Privacy Policy is to inform you of the type of personal data we collect and process, as controller, as well as the legal basis and purposes of such processing. The Privacy Policy also provides information about your rights as data subject.

AmCham EU holds and processes personal data from its members, prospects, external stakeholders (such as representatives of European institutions) and suppliers’ representatives for a variety of business purposes. The processing of personal data, such as business contact details, takes place in line with the GDPR<sup>1</sup> and the Belgian specific data protection law applicable to AmCham EU.

## Controller’s contact details

As mentioned above, for the purposes of GDPR, AmCham EU is the controller. Our contact details are the following:

Avenue des Arts/Kunstlaan 53

1000 Brussels

Belgium

Attention: Operations Group/Operations Director

Phone: +32 (0) 2 513 68 92

Email: [gdpr@amchameu.eu](mailto:gdpr@amchameu.eu)

## Personal data we collect and process

AmCham EU collects and processes personal data when a data subject participates in AmCham EU activities (ie, events, delegation meetings), visits the AmCham EU website or clicks on the links of AmCham EU e-correspondences.

AmCham EU collects, stores and processes the following categories of personal data:

- Identification and contact data (such as name, email address, telephone numbers, job title, company name, office location details, individual pictures, LinkedIn profile, gender, credit card details);
- Activities (such as the participation in our events and meetings).

In particular, AmCham EU collects personal data in various ways such as:

- Through the members’ profile page;
- Through registration to our events, surveys and other online forms;
- Through emails;
- Through websites;
- Business cards.

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<sup>1</sup> Regulation (EU) 2016/679 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 (General Data Protection Regulation).

The use of the AmCham EU's website is possible without providing any personal data; however, if our members want to use special services via our website or external stakeholders want to receive marketing mailings, then processing of personal data will become necessary.

When accessing our website, AmCham EU may collect the following data: the browser types and versions used, the operating system used by the accessing system, the website from which an accessing system reaches our website (so-called referrers), the sub-websites, the date and time of access to the Internet site, an Internet protocol address (IP address), and the Internet service provider of the accessing system.

The above personal data is needed to deliver the content of our website and e-newsletters correctly, optimise the content of our website and e-newsletters, ensure the long-term viability of our information technology systems and website technology, and provide law enforcement authorities with the information necessary for criminal prosecution in case of a cyber-attack in compliance with the GDPR and applicable laws.

AmCham EU has implemented technical and organisational measures to ensure the protection of personal data processed through our website. However, Internet-based data transmissions may have security gaps, so absolute protection may not be guaranteed. For this reason, every data subject is free to transfer personal data to us via alternative means, e.g. by telephone.

During our events, pictures may be taken and videos may be recorded. These materials could be used for marketing, communication purposes and may also be uploaded to our website and third-party's supplier platforms, such as Flickr, Twitter, Facebook and Google+. Should you wish not to feature in those materials, please contact our Operations Group/Operations Director at [gdpr@amchameu.eu](mailto:gdpr@amchameu.eu).

## Legal basis for the processing

The processing of AmCham EU members' personal data is necessary for legal reasons and for the performance of our contract to which the data subject is party. Additionally, we may process personal data (refer to section 'Personal data we collect and process') of other stakeholders with legitimate interests pursued by AmCham EU for outreach activities, sharing our positions on different policy matters, advocating for the interest of our members and marketing purposes.

## Business purposes

We may process personal data from data subjects for the following business purposes, serving and addressing the needs and demands from our members and external stakeholders:

- Notify you via our daily/weekly e-newsletters about our (committee specific) activities;
- Organise and promote our events;
- Send e-correspondences with (external) stakeholders;
- Include you in our Members Directory (with access restricted to membership);
- Gather your input through surveys;
- Notify you about general announcements;
- Understand your interest in our website and improve its user friendliness.

## Third-party service providers processing your personal data

We may ask third-party service providers to process your personal data solely for our business purposes. AmCham EU has contractual clauses that requires third-party service providers to keep your personal data secure and not to use it for their own direct marketing purposes.

## Transfer of personal data to a third-country

AmCham EU does not transfer personal data to third-countries which lack adequate levels of protection recognised by the EU Commission.

## Opt-in/opt-out choice

AmCham EU offers the data subject the choice of receiving different types of communication related to our events, outreach, press and other services. He/she may subscribe (opt-in) to our e-newsletters or other correspondences from our committees/task forces. If at any time a data subject would like to change his/her communication preferences, we provide an opt-out mechanism for his/her convenience. AmCham EU members may also access and manage their preferences from the members' profile page.

## Registration and creation of members' profiles on our website

Only AmCham EU member companies are granted access to the membership restricted area of our website, after their representatives have shared their personal data with us during their registration. The personal data entered by the data subject are collected and stored exclusively for internal use by the controller, and for its own business purposes as listed in the corresponding section.

## Rights of the data subject

All data subjects may exercise the following rights, at any time, within the limits set out in the GDPR and any other applicable laws, by contacting our Operations Group/Operations Director by email at [gdpr@amchameu.eu](mailto:gdpr@amchameu.eu). Refer to section 'How to contact us' for more details.

- Right of confirmation that personal data about them are being processed by us
- Right of access to such personal data (with the right to obtain a copy thereof)
- Right to rectification of any erroneous or out-of-date personal data
- Right to erasure (Right to be forgotten) of their personal data
- Right of restriction of processing of their personal data
- Right to have their personal data returned to them or transferred to a third party of their choice (data portability)
- Right to object to the processing of their personal data
- Right to withdraw their consent (including any opt-in) for the processing of their personal data

In addition, you have the right to lodge a complaint with the competent supervisory authority (in principle, the Belgian Data Protection Authority).

## Data protection for job applications and recruitment procedures

AmCham EU may collect and process the personal data of applicants for the purpose of the processing of the application procedure. This is the case, in particular, if a candidate submits corresponding application documents by email. If AmCham EU concludes an employment contract with an applicant, the submitted data will be stored

for the purpose of processing the employment relationship in compliance with legal requirements. If no employment contract is concluded with the candidate by the controller, the application documents shall be automatically erased two months after notification of the refusal decision.

## Period for which the personal data will be stored

Your personal data may be stored for a period not to exceed ten years. After expiration of that period or three months after end of membership or after the end of mandate for public representatives, whatever occurs first, the corresponding personal data will be deleted within three months, as long as it is no longer necessary for the fulfilment of our business purposes.

## Links to other sites

Our website, e-newsletters and direct marketing mailings may contain links to other sites. If you click on a third-party links, you will be directed to those sites. Note that these external sites are not operated by AmCham EU. Therefore, we strongly advise you to review the Privacy Policy of those websites. We have no control over, and assume no responsibility for the content, privacy policies, or practices of any third-party sites or services.

## Children's privacy

AmCham EU's services do not address anyone under the age of 16. We do not knowingly collect personal identifiable information from children under 16. In the case we discover that a child under 16 has provided us with personal information, we immediately delete this from our servers. If you are a parent or guardian and you are aware that your child has provided us with personal information, please contact our Operations Group/Operations Director so that we will be able to take the necessary measures.

## Cookies

Cookies are text files that are stored in a computer system via an Internet browser. AmCham EU is using cookies in our daily and weekly e-newsletters and also the following websites:

[www.amchameu.eu](http://www.amchameu.eu)

[www.investedineurope.eu](http://www.investedineurope.eu)

Through the use of cookies, AmCham EU can provide the users of this website and e-correspondences with more user-friendly services that would not be possible without the cookie setting.

By means of a cookie, the information and offers on our website and e-newsletters can be optimised with the user in mind. Cookies allow us to recognise our website users. The purpose of this recognition is to make it easier for users to utilise our website. The website user that uses cookies, e.g. does not have to enter access data each time the website is accessed, because this is taken over by the website, and the cookie is thus stored on the user's computer system. The online store remembers the articles that a customer has placed in the virtual shopping cart via a cookie.

The data subject may, at any time, prevent the sending of cookies through our website by means of a corresponding setting of his/her Internet browser, and may thus permanently deny the sending of cookies. Furthermore, already set cookies may be deleted at any time via such Internet browser or other software programs. This is possible in all popular Internet browsers. If the data subject deactivates the setting of cookies in his/her Internet browser, not all functions of our website may be entirely usable. You can allow cookies from

specific websites by making them ‘trusted websites’ in your web browser. The ‘Help’ function within your web browser should tell you how to make these changes.

## Changes to the Privacy Policy

We may update the AmCham EU Privacy Policy from time to time. We will notify you about the changes to this Privacy Policy by sending a notice to the email address you provided to us or by placing a prominent notice on our website.

## How to contact us

Should you have comments or questions about this Privacy Statement, you may email us at: [gdpr@amchameu.eu](mailto:gdpr@amchameu.eu). You may also contact us via postal mail at the following address:

AmCham EU

Avenue des Arts/Kunstlaan 53

1000 Brussels

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