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PRIVACY POLICY APEEE AISBL

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1. INTRODUCTION

APEEE cares about your privacy and treats personal data as confidentially as possible.

The protection of your privacy and your personal data is an extremely serious matter for us. We collect, store and use your personal data only in accordance with the contents of this privacy policy ("Privacy Policy") and the applicable data protection provisions, in particular the provisions of the European General Data Protection Regulation ("GDPR") and the national data protection provisions.

This Privacy Policy explains which personal data is collected and processed, for what purposes, how long we retain the personal data, what your rights are in this respect and how you can contact us.

This Privacy Policy applies inter alia to (i) our websites: <https://www.apee3.be/> and <https://services.apee3.be/> (hereinafter "our Websites") and (ii) all relationships via any other means of communication between you and us.

2. GENERAL INFORMATION APPLICABLE TO ALL OUR PERSONAL DATA PROCESSING OPERATIONS

2.1. WHO IS THE DATA CONTROLLER?

Association des parents des élèves de l'Ecole européenne de Bruxelles III, an international non-profit association, with registered office at Boulevard du Triomphe 135, 1050 Brussels, Belgium and registered in the Belgian Crossroads Bank for Enterprises under the number 0475.328.209 (hereafter "APEEE", "we" and "us") is responsible for the processing of your personal data as described in this Privacy Policy.

Please note that APEEE is the data controller of your personal data, which means that we have a direct responsibility to you with regard to the processing of your personal data. This Privacy Policy relates solely to our relationship with you as the data controller.

2.2. HOW DO WE RECEIVE YOUR PERSONAL DATA?

Personal data is data that can be used to identify an individual person directly or indirectly. We may collect and process personal data in different ways.

You usually provide us with your personal data yourself. However, sometimes we receive your personal data indirectly, for example:

- through Ecole Européenne of Bruxelles III ("EEBIII") we obtain the contact details of parents/legal guardians of pupils at EEBIII who have indicated that they are interested in becoming a member of APEEE; and
- through parents/legal guardian who register as members with APEEE, we obtain personal data of their children who are pupils at EEBIII and of pickup persons designated by an APEEE member as being authorized to pick up the child(ren) from the bus.

2.3. DO WE SHARE YOUR PERSONAL DATA OUTSIDE THE EUROPEAN UNION?

In principle, we only use your personal data for providing the services you have requested or for performing any associated service, namely communication, that is linked to your membership. If we use external service providers to provide these services, these service providers have access to your personal data solely within the framework of their services. We have taken the necessary technical and organizational measures to ensure compliance with data protection provisions and also require external service providers to do so. We have concluded or are concluding data processing agreements with the relevant third parties processing personal information on behalf of the APEEE, which contain the necessary guarantees with regard to the confidentiality and observance of privacy of your personal data.

Notwithstanding the above, APEEE may disclose your personal data to the competent authorities (i) if APEEE is obliged to do so by law or judicial process and (ii) in order to protect and defend our rights.

In principle, APEEE does not transfer your personal data to recipients in countries outside the European Economic Area. However, should there ever be such transfer, APEEE will ensure that any transfer of personal data outside the European Economic Area to a recipient in a country not covered by a European Commission decision to provide an adequate level of protection, will be subject to the provisions of a data transfer agreement, which will include (i) the standard contractual clauses issued by the European Commission, or (II) any other mechanism in accordance with the privacy legislation, or any other regulation relating to the processing of personal data.

2.4. WHAT RIGHTS DO YOU HAVE AS A DATA SUBJECT?

You have several rights:

- You always have a **right of access** your personal data via MyAPEEE. This allows you to check what personal data we process about you;
- You always have a **right to rectify** your personal data. This allows you to correct or complete incorrect or incomplete personal data that we process about you;
- You have a **right to erasure** of your personal data. This allows you to permanently delete personal data that we process about you. We are not always obliged to delete your personal data at your request – this right only applies in the cases and to the extent provided for by law;
- You have a **right to restrict** the processing of personal data relating to you. This allows you to freeze the use of your personal data by us, without deleting it. We are not always obliged to restrict your personal data at your request – this right only applies in the cases and to the extent provided for by law;
- You have the right to **object to the processing of your personal data**. This allows you to oppose the further processing of your personal data, if you have given your consent for processing your data for communication purposes. The right to object may not be exercised for data that are essential for the validity and performance of your contract with the APEEE for the provision of services, unless you have previously requested its termination and there are no due amounts left. Moreover, we are not always obliged to honour your objection, if other legitimate interests of the APEEE might be at risk;
- You have the right to withdraw your **consent** at any time where the processing of your personal data is carried out on the basis of your consent (for communication purposes);

- You always have the right **to object** the processing of your personal data for direct marketing purposes; the term of direct marketing does not include the communication about APEEE services or of educational content provided by third parties that is shared by the APEEE, unless you withdraw your consent for communication purposes as stated in the previous point;
- You have the right **to data portability**. This allows you to transfer, copy or forward personal data easily from one data controller to another. This right can only be exercised if the processing is based on your consent or on an agreement with you. It must be highlighted though that this right is void of purpose in our case, as the APEEE enrolment policy does not involve the transfer of your personal data on request to another data controller.

If you wish to exercise any of the rights mentioned above, please contact us at privacy@apeeeb3.be or by post. Information provided is initially free of charge. You can exercise these rights on a reasonable basis.

2.5. DO YOU HAVE ANY QUESTIONS OR A COMPLAINT?

For all questions or complaints regarding the processing of personal data, please contact us:

Association des parents des élèves de l'Ecole européenne de Bruxelles III AISBL
Boulevard du Triomphe 135
1050 Brussels
privacy@apeeeb3.be
Tel. +32 2 211 40 00.

You can also file a complaint with the supervisory authority of your place of residence. For Belgium this is:

Data Protection Authority
Press Street 35
1000 Brussels
contact@apd-gba.be
Tel. +32 2 247 48 00
<https://www.gegevensbeschermingsautoriteit.be/>

3. SPECIFIC PROCESSING OPERATIONS THAT MAY APPLY TO YOU

Under what circumstances APEEE collects, uses or otherwise processes different types of personal data from you, for what purpose, on what legal basis, for what period and with whom they are shared, is described below.

3.1. YOU ARE A MEMBER OF APEEE

APEEE may collect and process one or more of the following personal data:

- contact information: name, telephone number, e-mail address, address and other contact information;

- correspondence and other forms of communication: letters, e-mails and other (forms of) communication;
- financial identification data: bank account numbers, credit or debit card numbers;
- electronic identification data: IP address;
- audio and video recordings.

However, we will never collect more personal data from you than is strictly necessary to fulfil the purposes for which we have collected your personal data.

APEEE processes the above-mentioned personal data for the following purposes:

- I. to provide you with the services as agreed with you (i.e. basic membership service and specific membership services such as canteen, transport and extracurricular activities);
- II. to provide you with further information on our services upon your request or on our initiative, if this communication is deemed necessary in order to accurately carry out our services (e.g. communication via e-mail and sms messages);
- III. to provide you our newsletter to keep you informed of educational matters as well as events or important news regarding EEBIII and the APEEE community and APEEE activities and services, among other things;
- IV. to deal with any complaint and/or feedback;
- V. to make or collect payments;
- VI. to comply with any legal obligations;
- VII. to record the (virtual) General Assemblies of the Members of the APEEE under the Statutes and/or the internal provisions, and share the recording with all Members including those who could not attend the General Assembly and for preparing written transcripts of these General Assemblies.

APEEE processes the above-mentioned personal data on the basis of the following legal grounds:

- the processing is necessary for the performance of a contract to which you are a party or in order to take steps at your request prior to the conclusion of a contract (purposes I to V above);
- the processing is necessary in order to fulfil a legal obligation incumbent on APEEE (purpose VI above);
- the processing is based upon your consent (purpose VII above).

We will retain your personal data as long as you remain member of the APEEE. If your child(ren) benefited from APEEE service(s) for a given school year, the financial data involved will be kept for seven calendar years following the end of your membership.

In the context of fulfilling these purposes, we may communicate your personal data to sub-contractors who process personal data on our behalf (processors), e.g. for sending out our newsletters for which we refer to section 2.3 above.

3.2. YOU ARE A MEMBER INVOLVED/VOLUNTEERING AT APEEE (class/section representatives / members of the APEEE Board / members of working groups / etc.)

APEEE may collect and process one or more of the following personal data:

- contact information: name, telephone number, e-mail address, address and other contact information;
- correspondence and other forms of communication: letters, e-mails and other (forms of) communication;

However, we will never collect more personal data from you than is strictly necessary to fulfil the purposes for which we have collected your personal data.

APEEE processes the above-mentioned personal data for the following purposes:

- I. for the purpose of (re)election of class/section representatives and the APEEE Board, for the participation in APEEE bodies such as the General Assembly of APEEE and APEEE working groups and for the good functioning of these different APEEE bodies;
- II. for the organization of and support for school events and activities managed by APEEE (e.g. Springfest: coordination of food stands/sale of tickets/supervision of games/activities etc.).

APEEE processes the above-mentioned personal data on the basis of the following legal grounds:

- the processing is necessary for the performance of a contract to which you are a party or in order to take steps at your request prior to the conclusion of a contract (purposes I to II above).

We will retain your personal data during the school year and until the election of the new representatives in the respective bodies or at the end of your engagement in any voluntary activity.

In the context of fulfilling these purposes, we may communicate your personal data to sub-contractors who process personal data on our behalf (processors), when it is strictly necessary for the execution of the activity.

3.3. YOU ARE A PUPIL AT EEBIII

APEEE may collect (indirectly via your parent(s)/legal guardian(s) who is/are member(s) of APEEE) and process one or more of the following personal data of you:

- contact information: name, address, telephone number;
- personal identification data: age, gender, photo;
- information about your registration as a pupil at EEBIII (such as a badge number);
- sensitive data: data concerning health (e.g. Covid-19 contamination).

However, we will never collect more personal data from you than is strictly necessary to fulfil the purposes for which we have collected your personal data.

APEEE processes the above-mentioned personal data for the following purposes:

- I. to provide and organize the APEEE services (i.e. basic membership service and specific membership services such as canteen, transport and extracurricular activities);
- II. for safety/security reasons: health data is processed inter alia for contact tracing (to reduce the spread of Covid-19); your photo is processed to know who is authorized to get off the bus unaccompanied.

APEEE processes the above-mentioned personal data on the basis of the following legal grounds:

- your parent/legal guardian who is a APEEE member has concluded a contract for the provision of services concerning you (purposes I and II above)
- your parent/legal guardian who consented to the processing of your personal data (parental consent) for communication purposes.

We will retain your personal data, including your photo, as long as your APEEE membership is active. If you benefited from APEEE service(s) for a given school year, the financial data involved will be kept for seven calendar years following the end of your membership.

In the context of fulfilling these purposes, we may communicate your personal data to:

- subcontractors who process personal data on our behalf (processors);
- information regarding a Covid-19 contamination will only be shared with the APEEE management board and in a pseudonymized form with a limited group of APEEE staff members as well as with the School management.

3.4. YOU ARE A PICKUP PERSON DESIGNATED BY AN APEEE MEMBER

APEEE may collect (indirectly via parent(s)/legal guardian(s) of pupils) and process one or more of the following personal data of you as pickup person, designated as being authorized to pick up the pupil(s) from the bus:

- contact information: name, telephone number.

However, we will never collect more personal data from you than is strictly necessary to fulfil the purposes for which we have collected your personal data.

APEEE processes the above mentioned personal data for the following purposes:

- I. to provide and organize the APEEE services (i.e. specific membership services such as transport) so that we know who is authorized to pick up a pupil.

APEEE processes the above mentioned personal data on the basis of the following legal grounds:

- the parent/legal guardian who is an APEEE member has consented to the processing of your personal data and has confirmed that he/she has collected and disclosed your personal data in accordance with the data protection regulations (purposes I and II above).

We will retain your personal data as long as the parent/legal representative maintains your name as designated person.

In the context of fulfilling these purposes, we may communicate your personal data to sub-contractors who process personal data on our behalf (processors).

3.5. YOU ARE A VISITOR TO ONE OF THE APEEE WEBSITES AND/OR SUBSCRIBER TO OUR NEWSLETTER

APEEE may collect and process one or more of the following personal data:

- contact details: name, telephone number, e-mail address, address;
- correspondence and other forms of communication: letters, e-mails and other (forms of) communication;
- each time you surf our Websites, we may collect various personal data about you, in particular your IP address, surfing behaviour, source and search terms, on the basis of cookies and similar technologies.

However, we will never collect more personal data from you than is strictly necessary to fulfil the purposes for which we have collected your personal data.

APEEE processes the above-mentioned personal data for the following purposes:

- I. to answer your question or request for information;
- II. for direct marketing, to keep you informed of educational matters as well as events or important news regarding EEBIII and the APEEE community and APEEE activities and services, among other things;
- III. for the placing and reading of cookies. You can find more information about our use of cookies in our [Cookie Policy](#).

APEEE processes the above-mentioned personal data on the basis of the following legal grounds:

- the processing is necessary in order to take pre-contractual measures at your request (purpose I above); and
- the website user/visitor has consented to the processing of his/her personal data (purposes II and III above).

We will retain your personal data for a maximum period for a maximum of two weeks after your last visit. .

You can withdraw your consent at any time.

In the context of fulfilling these purposes, we may communicate your personal data to:

- subcontractors who process personal data on our behalf (processors);
- the third parties mentioned in the [Cookie Policy](#).

3.6. YOU ARE A (POTENTIAL) JOB APPLICANT OF APEEE

APEEE may collect and process one or more of the following personal data:

- contact information: name, position, telephone number, home address, e-mail address and other contact information;
- correspondence and other forms of communication: letters, e-mails and other (forms of) communication;
- further information in connection with recruitment: gender, date of birth, photo, application form, CV, interview notes and other employment history information; and
- judicial information: model 2 of criminal records.

However, we will never collect more personal data from you than is strictly necessary to fulfil the purposes for which we have collected your personal data.

APEEE processes the above-mentioned personal data for the following purposes:

- I. to assess the suitability of the (potential) applicant and to initiate an application procedure and for the evaluation of the application; and

- II. to comply with the legal obligation under Article 596, Alinea 2 of the Belgian Code of criminal procedure.

APEEE processes the above-mentioned personal data on the basis of the following legal grounds:

- the processing is necessary in order to take steps, at the applicant's request, prior to the conclusion of a contract to which the applicant becomes a party (purpose I above); and
- the processing is necessary in order to fulfil a legal obligation incumbent on APEEE (purpose II above).

We will retain your personal data for a maximum period of six months following your application. Data posted online are deleted after the end of each process.

In the context of fulfilling these purposes, we may communicate your personal data to sub-contractors who process personal data on our behalf (processors).

3.7. YOU ARE A SUPPLIER OF APEEE

APEEE may collect and process one or more of the following personal data:

- contact information: name, title, position, telephone number, e-mail address, office address and other contact and/or company information;
- correspondence and other forms of communication: letters, e-mails and other (forms of) communication; and
- information about the delivery of the product/service and all information about our commitment to the supplier, bank account numbers and all other information about payments.

However, we will never collect more personal data from you than is strictly necessary to fulfil the purposes for which we have collected your personal data.

APEEE processes the above-mentioned personal data for the following purposes:

- I. to buy goods or services;
- II. to comply with any legal obligations (including administration obligations).

APEEE processes the above-mentioned personal data on the basis of the following legal grounds:

- processing is necessary for the performance of a contract to which the supplier is party or in order to take steps at the request of the supplier prior to entering into a contract (purpose I above); and
- the processing is necessary in order to fulfil a legal obligation incumbent on APEEE (purpose II above).

We will retain your personal data during the duration of your contract and for seven calendar years following the last invoice.

In the context of fulfilling these purposes, we may communicate your personal data to:

- sub-contractors who process personal data on our behalf (processors).

3.8. YOU ARE APPLYING FOR SOCIAL FUNDING

APEEE may collect and process one or more of the following personal data:

- contact information: name of pupil, class, section, name of applicant parent (if beneficiary is a pupil), e-mail address;
- family situation and professional situation;
- financial information: monthly net income, monthly rent or mortgage payment, monthly loan payments, supporting financial information; and
- health information (not mandatory).

However, we will never collect more personal data from you than is strictly necessary to fulfil the purposes for which we have collected your personal data.

APEEE processes the above-mentioned personal data for the following purposes:

- I. to assist you when you are going through financial hardship by granting of social funds. The processing of the personal data are necessary for the assessment of the request for social funding, the granting of the social funding and follow-up after granting of the social funding.

APEEE processes the above-mentioned personal data on the basis of the following legal grounds:

- processing is necessary for the performance of a contract to which the supplier is party or in order to take steps at the request of the supplier prior to entering into a contract (purpose I above); and
- with regard to data concerning health, you as applicant have provided your explicit consent to the processing of your personal data (purpose I above).

We will retain your personal data until the formal approval of the closing accounts at the next General Assembly and for seven calendar years after that date.

In the context of fulfilling these purposes, we may communicate your personal data to:

- sub-contractors who process personal data on our behalf (processors).

4. CHANGES TO THIS PRIVACY POLICY

We may update this Privacy Policy from time to time. We therefore recommend that you consult it regularly in order to be aware of any changes.

Last updated on 2022.