

## **APEEE PRIVACY POLICY**

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## **THIS POLICY IS ESTABLISHED BY:**

The AISBL APEEE, Association des Parents d'Elèves de l'École Européenne Bruxelles 1  
Address: 46 Avenue du Vert Chasseur, 1180 Uccle, Belgium  
E-mail: [info@uccleparents.org](mailto:info@uccleparents.org)  
It is registered under the number of BCE n°: 0419.537.173

*Hereinafter, the "APEEE" or "we", "us", "our".*

We are particularly vigilant to the protection of personal data (hereinafter referred to as data) and to the respect of the privacy of all persons who come into contact with us. We act transparently, in accordance with national and international provisions in this area, in particular the Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of individuals with regard to data processing for personal use and for the free movement of this data, and which repeals Directive 95/46 / EC (hereinafter referred to as the "General Data Protection Regulation" or "GDPR").

This policy describes the measures undertaken for the treatment and processing of your personal data, and your rights as a data subject.

Please be aware that it can be updated at any time in order to comply with all regulatory, case law or technological developments. We invite you to consult it regularly.

Concerning our website we refer you to the privacy and cookies policy of our site by following this link: [www.uccleparents.org](http://www.uccleparents.org)

You can react to any of practices described below by contacting us.

### **1. Who are we?**

The Parents' Association of the Pupils of the European School Brussels I (APEEE) informs, represents and acts on behalf of all EEBI parents, independently of their status as APEEE members, with the following objectives:

- to promote the widest participation possible by parents in school life;
- to represent parents' pedagogical interests in the school's decision making bodies and with local, regional and European authorities;
- to collaborate in finding solutions to problems which parents face regarding their children's education;
- to improve communication between parents and school;
- to participate in the prevention of disciplinary problems and behaviour that may present risks.

The APEEE is a forum for dialogue and action open to all parents and all language sections together. We encourage parents to participate actively on the different school decision making bodies and to promote "the families' perspective" in a variety of pedagogical or community programmes and projects in which our children take part. The APEEE is also an important source of support to any family facing difficulties in the system. The APEEE works to ensure the best educational environment for children in the European School of Brussels I.

### **2. Who is this policy for?**

This policy addresses all natural persons, whose data we process such as parents of pupils and / or pupils whom we inform, represent or act on behalf and who participate in activities organized by us or send us a request.

We also process the data of persons who voluntarily share their personal data with us, such as future parents of students.

This policy is also addressed to all natural persons who assume the role of contact with one of our eventual suppliers or any organization (business, public authorities, professional federation of employers or workers, school, university...), with whom we have maintained or maintain or wish to maintain a collaboration. We particularly aim here at people working for the European school and non-profit or other organisations cooperating with the APEEE.

We inform you that your data will be used in compliance with this data protection declaration.

### 3. Why do we process your data?

We collect and process your personal data for different reasons based on a legal ground determined by the GDPR (for example, compliance with a legal obligation to which we are subject or the performance of a contract concluded with you).

The table below sets out the purposes and the legal grounds for the use of your personal data.

<b>Processings</b>	<b>Purposes</b>	<b>Legal grounds for processing</b>
Administrative management of parents who are members	We process your personal data to carry out the operations relating to the management of your membership and to give access to our activities and services.  E.g.: to process your enrolment requests, to manage de payment of your membership	In accordance with article 6.1.b) of the GDPR, this processing is necessary for contractual or statutory measures.  This processing is necessary to achieve our legal obligations in accordance with article 6.1.c) of the GDPR.
Administrative management of parents who are not members	We process the data you have shared with your class or section representatives to communicate with you and inform you about our activities and services.	In accordance with article 6.1.a) of the GDPR, this processing under your consent. When you share your data with your representatives, you express your consent to process your personal data by giving us a clear affirmative action.
Administrative management of our activities and services	We process personal data in order to organise our activities and provide eventual services in accordance with our statutes.  We process personal data in the context of support projects responding to a call for proposal.  F.I. project implementation for well-being projects, addition prevention, art or other projects; calculator's purchase, laptop's purchase, sale and exchange of books.	This processing is necessary for the execution of a commitment to you, in accordance with article 6.1.b) GDPR.
Management of our representation activity	We process personal data in order to represent you and act on your behalf in various	This processing is necessary for the execution of a commitment to you and for contractual or statutory

(Working Groups, Task Forces, Class Representatives, committees, etc.)	working groups, task forces, committees or other organisational structures.	measures, in accordance with article 6.1.b) GDPR.  This processing is also necessary to achieve our legal obligations in accordance with article 6.1.c) of the GDPR
Management of our association and the election of our board	We process your personal data to ensure the management of our AISBL, organisation of our Board, and our General Assembly (as well as elections), including obligatory sharing of data to the Moniteur Belge.	This processing is necessary to achieve our legal obligations in accordance with article 6.1.c) of the GDPR.
Management of our communication	We process personal data in order to provide you with information relating to our activities and services.  We may use your data to reply to your request and questions as well as to respond to our legitimate interest or to that of third parties, when this is necessary without affecting your interests or your fundamental freedoms and rights to offer and promote all services and / or share with you informative messages that correspond to what you can reasonably expect from us in the context of our existing relationship or possible future relationship.	We may process your data, in accordance with the provisions of Article 6§2, f), on the basis of our legitimate interest, as soon as we have balanced this interest with your interests or fundamental rights and freedoms by examining your "reasonable expectations".  You can object to the processing by contacting us.
Management of our pre-contractual relationships	We process your personal data in order to respond to requests that you address to us (in particular via the contact form on our site), or if you send us your CV to apply with us.	In accordance with article 6.1.b) of the GDPR, this processing is necessary in order to take steps prior to entering into a contract.
Management of our suppliers	We process personal data in order to fulfil our contractual obligations to you or to your company.	In accordance with article 6.1.b) of the GDPR, we process your data for the performance of our contracts concluded with you or your company.
Management of our litigation	We may use your data to respond to our legitimate interest or to that of third parties, when this is necessary without affecting your interests or your fundamental freedoms and rights to manage a	We also have a legitimate interest in processing personal data for the defence of our interests, in particular but not exclusively in the context of a dispute or legal action on the basis of Article 6.1.f) of the GDPR.

	litigation in the context of our existing relationship or possible future relationship.	We may also be required to process sensitive data in this context, in accordance with the provisions of article 9 §2, f) of the GDPR.
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Unless there are within a legal exception, you can object to the processing based on this basis, or on your consent at any time, by contacting us.

#### 4. What data is collected and processed?

We only collect personal data that is adequate, relevant and limited to what is strictly necessary with regard to the purposes for which it is processed.

Depending on the purposes, data collection is carried out differently.

We detail below the personal data that we collect about you as well as the methods of collection.

<b>Processing activities</b>	<b>The data collected and processed</b>	<b>Collection methods</b>
Management of parents who are members	<ul style="list-style-type: none"> <li>- Personal identifying data (surname, first name, address, telephone number, etc.)</li> <li>- Electronic identification data (email address, encrypted password (if applicable), etc.)</li> <li>- Family data, (names and first names of children, marital status, children's class year)</li> <li>- Photographs</li> <li>- Professional data (profession, career, title, company, etc.)</li> <li>- Financial data (account number).</li> </ul>	<ul style="list-style-type: none"> <li>- Directly from you</li> <li>- You have made them publicly available</li> <li>- From the APEEE Services ASBL</li> </ul>
Management of parents who are not members	<ul style="list-style-type: none"> <li>- Personal identifying data (surname, first name, address, telephone number, etc.)</li> <li>- Electronic identification data (email address, encrypted password (if applicable), etc.)</li> <li>- Family data, (names and first names of children, marital status, children's class year)</li> <li>- Financial data (account number). (only if you purchase through our organization)</li> </ul>	<ul style="list-style-type: none"> <li>- From your class or section representatives</li> </ul>
Management of our activities and services	<ul style="list-style-type: none"> <li>- Personal identifying data (surname, first name, address, telephone number, order number, etc.)</li> <li>- Electronic identification data (IP address, email address, encrypted password (if applicable), etc.)</li> <li>- Financial data (account number, revenue, ...)</li> <li>- Student's identifying data (surname, first name, address, telephone number, order number, etc)</li> <li>- Student's family data (siblings, ...)</li> <li>- Student's health data only for certain of our assistance services</li> <li>- Student's personal feature (nationality, gender, languages spoken, country and town/city of birth)</li> <li>- Student's pedagogical information, (linguistic competences, ...)</li> <li>- Student's photographs</li> </ul>	<ul style="list-style-type: none"> <li>- Directly from you</li> <li>- You have made them publicly available</li> <li>- From the APEEE Services ASBL</li> </ul>

Management of our representation activity (Working Groups, Task Forces, Committees, Class Representative, etc)	<ul style="list-style-type: none"> <li>- Personal identifying data (surname, first name, address, telephone number, etc.)</li> <li>- Electronic identification data (email address, encrypted password, if applicable, etc.)</li> <li>- Family data, (names and first names of children, children's class year)</li> <li>- Photographs (if applicable)</li> <li>- Professional data (profession, career, title, company, etc.)</li> </ul>	<ul style="list-style-type: none"> <li>- Directly from you</li> <li>- You made them available to us in the context of the related activities, such as class representation, or working group activity</li> </ul>
Management of our association and the election of our Board	<ul style="list-style-type: none"> <li>- Personal identifying data (surname, first name, address, telephone number, order number, etc.)</li> <li>- Electronic identification data (IP address, email address, encrypted password, etc.)</li> <li>- Personal features (age, sex, date of birth, country, language)</li> <li>- Professional data (profession, diploma, career, etc.)</li> <li>- Photographs</li> <li>- ID copy</li> </ul>	<ul style="list-style-type: none"> <li>- Directly from you</li> <li>- You have made them publicly available</li> <li>- From the APEEE Services ASBL</li> </ul>
Management of our communication	<ul style="list-style-type: none"> <li>- Personal identifying data (surname, first name, address, telephone number, order number, etc.)</li> <li>- Electronic identification data (IP address, email address, encrypted password, etc.)</li> </ul>	<ul style="list-style-type: none"> <li>- Directly from you</li> <li>- You have made them publicly available</li> <li>- From the APEEE Services ASBL</li> </ul>
Management of our pre-contractual relationships	<ul style="list-style-type: none"> <li>- Personal identifying data (surname, first name, address, telephone number, order number, etc.)</li> <li>- Electronic identification data (IP address, email address, encrypted password, etc.)</li> <li>- Family data, (names and first names of children, marital status)</li> <li>- Personal feature (age, sex, date of birth, language)</li> <li>- Professional data (profession, diploma, career, etc.)</li> </ul>	<ul style="list-style-type: none"> <li>- Directly from you</li> <li>- You have made them publicly available</li> <li>- From the APEEE Services ASBL</li> <li>- From the European School</li> </ul>
Management of our litigation	<ul style="list-style-type: none"> <li>- Personal identifying data (surname, first name, address, telephone number, order number, etc.)</li> <li>- Electronic identification data (IP address, email address, encrypted password, etc.)</li> <li>- Personal features (age, sex, date of birth, country, language)</li> <li>- Financial data (account number, open receivables, revenue etc.) only if you subscribe to a paid service.</li> <li>- Health data and any sensitive data necessary for the defence of our legal interests.</li> <li>- Students</li> <li>- Photographs.</li> </ul>	<ul style="list-style-type: none"> <li>- Directly from you</li> <li>- You have made them publicly available</li> <li>- From the APEEE Services ASBL</li> </ul>
Management of our suppliers	<ul style="list-style-type: none"> <li>- Personal identifying data (surname, first name, address, telephone number, order number, etc.)</li> <li>- Electronic identification data (IP address, email address, encrypted password, etc.)</li> <li>- Financial data (account number, open receivables, etc.)</li> </ul>	<ul style="list-style-type: none"> <li>- Directly from you</li> <li>- You have made them publicly available</li> </ul>

## 5. Is your data disclosed or shared with third parties?

The data listed above is accessible to people who are members of our team, or intervening as collaborators, and only to the strict extent necessary to our lawyers or any technical advisers, to banking or insurance organisations.

We are also likely to transmit your data:

- a) at the request of a legal, judicial or administrative authority or auxiliary of justice; or
  - b) in good faith, considering that this action is required to comply with any current law or regulation.
  - c) in order to protect and defend our rights or those of other users of our services.
- We may also be required to leave access to certain data to our co-contracting parties, qualified as "subcontractors" within the meaning of the legislation, to the extent strictly necessary for the achievement of our purposes, such as the operation of applications or computerized management systems.

In all circumstances, we ensure the protection of your data by agreements ensuring confidentiality.

Type of service provider / co-controller	Provider name	Location
Providers of email sending solutions	Microsoft	In Europe
Providers of mailing solutions	B-Post	In Europe
Providers of IT solutions and maintenance of infrastructure and systems	NSI NET-C DS-Developpement	In Europe
Social media	Facebook LinkedIn	In Europe
Hosting / Cloud service providers	NET-C	In Europe
Lawyers and legal services providers	ADVISORS By Parsa Saba	In Europe
HR services and social security	Securex	In Europe
Accountants and financial services providers	ARITHMOS	In Europe
Communication tools	WhatsApp Slack Trello Zoom Skype Microsoft Teams	In Europe
Institutions – organisation – bodies	APEEE Services European school	In Europe
Banks	ING	In Europe

## 6. Do we transfer your data outside the European Union?

We do not make transfers outside the European Union. If applicable, data transfers to a country outside the Union will only be authorized if and only if:

- ✓ The European Commission has issued a decision granting an adequate level of protection equivalent to that provided for by European legislation, personal data will be transferred on this basis.
- ✓ The transfer is covered by an adequate measure granting a level of protection equivalent to that provided for by European legislation, such as the European Commission's Standard Clauses or other contractual clauses pursuant to Article 46 of the GDPR, consent.

## 7. How long is your data kept?

The data storage period varies according to the purposes of the processing of your data. This period is limited by taking into account any conservation obligations imposed on us by law.

You will find below the list of purposes as well as the retention periods.

<b>Data Processing Activity</b>	<b>Duration</b>
Management of parents who are members	Data storage is 5 years from the termination of APEEE membership.
Management parents who are not member	Data storage is 5 years from the cessation of the objective of using the data for the legitimate purpose of communication, request handling or other goals described above.
Management of our activities and services	Data storage is 5 years from the termination of APEEE membership or the cessation of the particular activity or service
Management of representation (Working Groups, Task Forces, Class Reps, etc)	Data storage is 2 years from the termination of class representative or working group membership
Management of our association and the election of our board.	Data storage is 5 years from de closing of the liquidation of our Association (Art. 2:143, 3:103, and 9:3 of the Code of Companies and Associations)
Management of our communication	Data storage is 5 years from the cessation of the objective of using the data for the legitimate purpose of communication
Management of our pre-contractual relationships.	Data storage is 3 year from your last reaction
Management of our litigation	Data storage is 5 years from expiry of all legal claims
Management of our suppliers	Data storage is 10 years from the last day of the year they were incorporated in our accounting system. (Art. III.86 and III.88 of the Code of Economic Law and Art. 8 of the Royal Decree implementing Articles III.82 to III.95 of the Code of Economic Law)

## 8. How do we protect your privacy?

In order to guarantee an optimum level of security, we implement the appropriate technical and organizational measures (encryption technology and security protocols to protect and avoid loss, contracts with our employees and suppliers).

We take into account the state of knowledge, the costs of implementation and the nature, scope, context and purposes of the processing as well as the risks to your rights and freedoms.

In all circumstances, we ensure an adequate level of technical and organizational security of your data, in order to protect you from any data leak, in particular loss, destruction, public disclosure, unauthorised access or any improper use. However and if you become aware of the existence of any incident involving personal data or a data leak or if you suspect one, we ask you to report it to us immediately by contacting us.

## 9. What are your rights and how to exercise them?

Unless a current legal provision in Belgium does not allow it, including the GDPR, under the regulation you have the following rights:

- The right of access including the right to know that we process your data;
- The right to have a copy of your data processed;
- The right to rectify any inaccurate data processed concerning you;
- The right to object to the processing of your data in particular if you wish to withdraw your consent or if we process your data under our legitimate interest;
- The right to limit the processing of the data processed;
  - If you dispute the accuracy of this data. Pending the assessment of the interests present



before the exercise of the right of opposition to the processing of some of your personal data.

- If the processing of your personal data could be illegitimate, but you do not wish to exercise your right to erasure of the data.
- If we no longer need your personal data, but you need it in the context of a legal action.
- The right to erasure of your data processed. However, this right is not absolute, and we cannot follow it up if a legal obligation forces us to process your data.
- The right to the data portability of your data processed, namely to recover or transfer to a third party that you designate, your personal data that we process, for your personal use, and this in the format in which we store them.
- The right to lodge a complaint with the Data Protection Authority:  
[www.autoriteprotectiondonnees.be/](http://www.autoriteprotectiondonnees.be/)  
Rue de la Presse, 35 at 1000 Brussels  
Phone: +32 (0) 2 274 48 00  
Fax: +32 (0) 2 274 48 35  
Email: [contact@apd-gba.be](mailto:contact@apd-gba.be)

You can also file a complaint with the first instance court.

For further information on complaints and possible remedies, you are invited to consult the following address of the Data Protection Authority:

<https://www.autoriteprotectiondonnees.be/introduire-une-requ%C3%AAteune-plainte>

If you wish to react to one of the practices described in this Policy or if you need more information about your rights, please contact us. We will follow up on your request as soon as possible and at the latest within one month of receipt of your request, we will inform you of the action we have undertaken.

Depending on the difficulty of your request or the number of requests we receive, this period may be extended by two months. In such case, we will notify you of this extension within one month of receiving your request.

In all circumstances, when communicating this information, we are always obliged to take into account the rights and freedoms of other people.

You can exercise your rights by sending an email to the following address: [info@uccleparents.org](mailto:info@uccleparents.org) or by post to the following address:

l' AISBL APEEE Association des Parents d'Élèves de l'École Européenne de Bruxelles 1  
46 Avenue du Vert Chasseur, 1180 Uccle, Belgium

## **10. Do we use cookies?**

A cookie is a code in the form of a file stored on your computer. Cookies help us to improve our website, to facilitate your browsing or to analyse audiences.

To learn more about our Cookie Policy, please visit our website under the "Cookies Policy" tab.

## **11. What is the applicable law and the competent jurisdiction?**

This Policy is governed by Belgian law.

Any dispute relating to the interpretation or execution of this Policy will be subject to Belgian law and will fall under the exclusive jurisdiction of the courts of the judicial district of Brussels.

## **12. Be mindful about the update of this policy!**

This Policy can be updated at any time without notice of modification. We advise you and invite you to consult it regularly.

Last update on 14 June 2020.