

## European Commission Trainees Association Privacy Policy

This Privacy Policy governs the way the European Commission Trainees Association (collects, uses, maintains and discloses) your personal data in relation to its statutory activities.

The following definition apply:

**“Personal Data”**- Personal data is considered, following the GDPR definition, data that can reasonably identify a specific living person, either alone or with other information.

**“Trainees’ Committee”** – Governing body of the Association

**“Auditors”** – Elected members who audit the activity of the Association.

**“Subcommittee”** – Team of volunteers tasked with assisting their respective Coordinator.

**“User”** - Anyone who engages with ECTA activities and provides personal data

When this Privacy Policy mentions “ECTA”, “we”, “us”, or “our”, it refers to European Commission Trainees Association (the **“Data Controller”**), that is responsible for the processing of your personal data under this Privacy Policy.

### 1. The information we collect:

#### 1. Member Registration

We collect the following information for membership registration for identity confirmation, statistics, and contact:

- **Personal Information:** First name and last name, date of birth, and nationality.
- **Contact Details:** Personal and corporate email and phone number.
- **Traineeship details:** Blue Book number and traineeship placement.

#### 2. Team Recruitment

We collect the following information during team recruitment for identity confirmation and contact:

- **Personal Information:** First name and last name.
- **Contact Details:** Private and professional email, phone number.
- **Traineeship details:** Traineeship placement.

#### 3. Event Registration

When organising events the Association may collect the following information necessary for registration of attendees:

- **Personal Information:** First name and last name, date of birth, and nationality.
- **Contact Details:** Private and corporate email and phone number.

#### 4. EU Trainees Job Fair

When organising the EU Trainees Job Fair the Association may collect the following information from attendees and guests necessary for registration and security check:

- **Personal Information:** First name and last name, date of birth, and passport/ID number.
- **Contact Details:** Professional email
- **Traineeship details:** Blue Book number

#### 5. Yearbook

The Association may collect the following information to include in the Yearbook:

- **Personal Information:** First name and last name and nationality.
- **Contact Details:** Private and corporate email, LinkedIn profile.
- **Traineeship details:** Blue Book number and traineeship placement.

#### 6. Surveys

When conducting voluntary surveys the Association may collect the following information:

- **Personal Information:** First name and last name, date of birth, nationality, educational background, address.
- **Contact Details:** Private and corporate email
- **Traineeship details:** Blue Book number and traineeship placement.

#### 2. Usage of Information

Type of Information	Purpose	Legal Base
First Name and Last Name	Identification and registration of membership within our database; identification during; selection processes; identification for sign-ups; alumni network	User Consent
Date of Birth	Statistics for administration purposes, alumni network	User Consent
Private Email	Newsletters, internal communication and administration, alumni network	User Consent
Corporate Email	Confirmation of employment, internal communication and administration, alumni network	User Content

Phone Number	Team administration, and internal communication; alumni network	User Consent
LinkedIn profile	Yearbook information	User Consent
Blue Book Number	Confirmation of traineeship	User Consent
Traineeship Placement	Statistics for administration purposes	User Consent
T-Card Number	Identification for internal administration	User Consent
Nationality	Statistics for marketing and administration purposes; alumni network	User Consent
Education Information	Statistics for marketing and administration purposes; alumni network	User Consent
Address	Statistics for marketing and administration purposes	User Consent

### 3. Sharing and Internal Disclosure

#### 1. Internal Sharing

The information is internally disclosed in the following way:

- The Trainees' Committee is the Association's governing body. Hence, it automatically has access to the data collected in order to fulfill their tasks.
- The Auditors are tasked with supervising the activity of the Trainees' Committee, thus they have access to the data for audit purposes.
- The Subcommittees are teams aimed at assisting their respective Coordinators, thus they have access to the data within the scope of the Subcommittees work. For instance, the Careers subcommittee is the only subcommittee with access to the data collected for the Job Fair.

#### 2. Public Disclosure of Information

Under no circumstances will personal data be disclosed publicly. However, anonymous statistics based on personal data (e.g. nationality, education) may be used for marketing purposes.

#### 3. Service Providers

- MailChimp: Used for internal communication. Data provided: Personal Information (First Name), Contact Details (Corporate Email). Click [here](#) for their privacy policy.

- Instagram: Used for marketing and communication. No data directly provided, but they may gather data independently when used. We would like to point out that as a provider of the pages we have no knowledge of the content of the transmitted data as well as their usage. Click [here](#) for their privacy policy.
- Google Drive: Used for document and data management. Google drive contains all the personal data. Click [here](#) for their privacy policy.
- Google Forms: Used for selection processes and sign-ups. Apart from the information they gather on our behalf they may gather their own data independently. We would like to point out that as a provider of the pages we have no knowledge of the content of such data as well as their usage. Click [here](#) for their privacy policy.
- Sendinblue: Used for internal communication. Data provided: First and Last name, private email, corporate email, Blue Book number, T-Card number. Click [here](#) for their privacy policy.
- Pass2u: Used for the creation of the T-Card. First and Last name, private email, corporate email, Blue Book number, T-Card number. Click [here](#) for their privacy policy.
- Wix: Used for website and analytical services. No data directly provided, but they do gather data to provide us with analytics (anonymized information). Click [here](#) for their privacy policy.

#### 4. Safety and Compliance with the Law

ECTA discloses your information to courts, law enforcement or governmental authorities, or authorized third parties, if and to the extent that we are required to do so by law or if such disclosure is reasonably necessary: (i) to comply with legal process and to respond to claims asserted against ECTA, (ii) to respond to verified requests relating to a criminal investigation or alleged or suspected illegal activity or any other activity that may expose us, you, or any other of our Users to legal liability, (iii) for fraud investigation and prevention, risk assessment, customer support, product development and debugging purposes, or (v) to protect the rights, property or personal safety of ECTA, its members, or members of the public.

We will attempt to notify Users about these requests unless: (i) providing notice is prohibited by the legal process itself, by court order we receive, or by applicable law, or (ii) we believe that providing notice would be futile, ineffective, create a risk of injury or bodily harm to an individual or group, or create or increase a risk of fraud upon ECTA and its members. In instances where we comply with legal requests without notice for these reasons, we will attempt to notify that Users about the request after the fact if we determine in good faith that we are no longer legally prohibited from doing so and that no Risk Scenarios apply.

#### 4. Storage of Data

##### 1. Where?

The data is stored on files within the association's Google Drive. For their privacy policy click [here](#). Furthermore, some of this data is also stored within other service providers. You can check which data goes where on *Service Providers*. The data is securely stored by google, via encryption and special security programmes. Check it [here](#).

## 2. For how long?

Type of Data	Storage Period	Purpose
First Name and Last Name	Duration of Association or Alumni network membership	Administration/Alumni Network
Private and Corporate Email	Duration of Association or Alumni network membership	Administration/ Alumni network
Date of Birth, Nationality, Phone Number, Education, T-Card number, Address, Blue Book number, traineeship placement, LinkedIn profile	Until the end of the respective traineeship session	Administration
Third-party Personal Information and Third-party Contact Details	Until the end of the respective traineeship session	Follow-up emails

## 5. Your Rights

You have the right to:

- Information about and access to your personal data
- Rectify your personal data
- Erasure of your personal data
- Restriction of processing of your personal data
- Object to the processing of your personal data
- Receive your personal data in a structured, commonly used and machine-readable format and to (have) transmit(ted) your personal data to another organization.

To exercise any of these rights send an email to [traineescommittee@ec.europa.eu](mailto:traineescommittee@ec.europa.eu)

Finally, you also have the right to lodge a complaint with the relevant data protection authority including the Belgian Data Protection Authority relating to the processing of your personal data by ECTA.

## 6. Contact

If you have any questions or complaints about this Privacy Policy or ECTA's personal data practices, you can contact us at [traineescommittee@ec.europa.eu](mailto:traineescommittee@ec.europa.eu)