

Privacy Policy & Processing of Personal Data

Updated: September 2019

This privacy policy defines and informs visitors and members (potential and actual), hereinafter referred to as general term "visitors", of how the foreign association European AIDS Treatment Group, hereinafter referred to as "EATG", uses and protects the information provided to it and, more particularly but not exclusively, when the visitor uses these sites accessible via the following links:

- www.eatg.org ;
- www.eatgtrainingacademy.com ;
- www.eatg4women.com ;
- www.ageingwithhiv.com.

hereinafter the "sites", or when the visitor uses or uses the services and products offered by EATG.

It also defines how EATG complies with and applies Regulation 2016/679 of the European Parliament on the protection of individuals with regard to the processing of their personal data.

This Privacy Policy may be amended or supplemented at any time by EATG, in particular to comply with any legislative, regulatory, jurisprudential or technological changes. In such a case, the date of its update will be clearly identified at the beginning of this policy. These changes are binding on the visitor as soon as they are put online. The visitor is therefore invited to regularly consult this privacy policy and the rules on the use of cookies in order to be informed of any changes.

I. PERSONAL DATA

In general, it is possible to visit the sites without providing any personal information. In any event, the visitor is under no obligation to transmit his information to EATG.

However, in certain situations where information is not transmitted, it is possible that the visitor may not be able to benefit from the requested services. In order to provide visitors with the services offered by EATG, in some cases, visitors may be asked to provide your name(s), first name(s), telephone, addresses (e-mail and postal), gender (sex), ethnic origin, date of birth, HIV status, hereinafter referred to as "personal information". By transmitting this information, the visitor expressly agrees that it may be processed by EATG for the purposes indicated in point 2 below and for the purposes mentioned at the time of each request.

In accordance with the General Data Protection Regulations (GDR) of 14 April 2016, EATG informs you of the following points:

1. Identity of the controller

The controller is

EUROPEAN AIDS TREATMENT GROUP E.V.,
Mettmanner Strasse 24-26 - 40233 DUSSELDORF - Germany (Dem. Rep.)
Headquarters in Belgium: Avenue des Art 56-4c - 1000 Bruxelles
Tel. + 32 (0) 2 626 96 40
E-mail addresses: office@eatg.org and communication@eatg.org

The controller shall ensure the accuracy and relevance of the personal data collected and processed. In addition to the above, it ensures that they comply with applicable regulations and this privacy policy.

2. Data collected

EATG collects personal data for professional purposes and with the express consent of the individual.

EATG collects the following personal data:

- language of use;
- contact details (surname(s), first name(s), postal address, e-mail, fixed and/or mobile telephone number(s), region);
- affiliations (professional / volunteer);
- food preference when attending a meeting/event;
- passport data for ticket booking and/or visa assistance;
- HIV status as part of the application for membership in the WGRI or other application (e. g. training);
- personal skills, needs;
- banking information (e. g. for payment of reimbursement, daily meal allowance);
- scholarship;
- other personal data necessary for the application, selection, organisation, identification of candidates or financial procedure.

3. Purposes of the processing operation

EATG may process personal information transmitted for the following purposes:

- sending the newsletter and/or information bulletin to the EATG visitor;
- investigation following an application for membership;
- participation in an event;
- provide the information or services requested by the user (by being present at the operating sites, by e-mail, by telephone or by post) and adapted to the user, and more particularly:
 - the processing and follow-up of requests for information from EATG;
 - the presentation of the services offered and provided by EATG;
 - statistics of visits to EATG websites;
- collect information to enable EATG to improve sites, products and services (including through cookies);
- to Google Analytics, through the use of cookies, as described below;
- to Facebook, through Facebook Pixel, and only for visitors who have a Facebook account;
- enable the customer to access EATG's services under the best possible conditions;
- allow visitors to access EATG's infrastructure under the best possible conditions;
- manage the contracts concluded between the member, the partner and EATG with regard to its legal and contractual obligations

This data will only be used for internal EATG purposes.

4. Recipients

Only EATG is the recipient of the personal information provided.

These, whether in individual or anonymised form, are under no circumstances passed on to a third party, with the exception of subcontractors, external service providers or partners used by EATG in the context of its legal or contractual obligations or in the context of the achievement of its corporate purpose, in order to ensure a complete and adequate service to the member and/or partner.

Neither EATG nor any of its subcontractors, external service providers or partners market the personal data of customers of the site and EATG.

5. Shelf life

Personal information is kept by EATG only for the time corresponding to the purposes of collection as stated above. In any event, unless another retention period is imposed by a legal or contractual obligation, the retention of the data shall not exceed 10 years.

6. Various

In addition to the above, EATG draws the visitor's or EATG member's attention in particular to the following topics:

- **Application for membership**

The information collected by EATG through the membership application forms is stored in the deposit box of the Development Membership Working Group. Only members of the Development Membership Advisory Group (DMAG) have access to it. These members are responsible for membership applications. In this context, they have signed a confidentiality agreement and act strictly within this framework. Once the review process is complete, the file is removed. The personal data of the accepted members are stored by the ED in printed and digital form. Personal data (e. g. name(s), contact details) are only accessible to staff.

Sensitive personal data (e. g. HIV status) are only accessible by the ED after examination of the request and are only used for statistical purposes.

Applications from candidates who are not accepted into the WGRI are automatically deleted.

- **Declaration of interests**

The information provided by members in their declaration of interest is collected and forwarded to the DMAG for review. On the basis of the information received, DMAG prepares an opinion for the Board of Directors. Contact information is used to update membership forms.

- **Photos and videos**

When participating in photographed and/or filmed events, a request for consent to use the image is automatically requested from EATG members and other participants (e.g.: request for signature for agreement to use the image by EATG, or by checking the corresponding box in the EATG conference participation request form, etc.). These will only be used for event related reports/minutes, social media communication, and other publications such as annual publications (e.g. birthdays), etc. These images will only be used for the purposes for which they were designed. It will not be shared with external parties without the explicit consent of EATG members and the person concerned.

In the event of a person's refusal to use their image, they will receive a yellow cord from EATG before the event to wear so that everyone can respect this refusal. All participants in EATG events who use their personal devices are required to follow this procedure.

Anyone has the right to request at any time the removal of his image.

- **Financial data**

EATG, as an officially registered organisation in Germany, is required to keep the archived financial data for 10 years, according to German law. Therefore, personal data relating to financial transactions are kept in our archives during this period. This includes digital and printed forms (e.g., reimbursement or project forms, accounting books, DMA forms, emails related to these financial transactions, etc.).

At the end of these 10 years, the financial archives are destroyed.

Payment data via PayPal is encrypted and is not stored by EATG.

- **Personal data collected for events and/or travel arrangements**

Personal data (such as passport data, food preferences, etc.) may be collected for events and/or travel arrangements. This data is used exclusively for the organisation of the event for which the request was made. Such data shall be deleted after the expiry of the period necessary for the storage of such data for legal purposes.

The sharing of documents between participants, such as lists of participants, departures, information on speakers and others, is only done with the explicit approval of the persons concerned.

The disclaimer below will be used for the organisation of events:

By completing the registration form, the candidate authorises EATG to process the personal data provided as part of the event, in accordance with European legislation on the GDPR. The applicant gives explicit consent to EATG to (tick the box if he/she consents):

- *be contacted by e-mail and/or telephone for organisational reasons, and/or to receive all relevant information about the event;*
- *appear on photos and/or videos;*
- *receive and wear a badge with name, first name, organisation/country;*
- *be on the list of participants;*
- *appear on the departure list;*
- *receive a certificate of attendance;*
- *that passport data (surname, first name, family name, date of birth, gender, citizenship, passport number, validity of the passport) is used for organisational purposes such as booking flight/train/bus tickets, hotel reservations, visa support.*

The processing of this personal data is carried out on behalf of EATG by FCM Travel Solutions.

This processing is governed by a contract between EATG and FCM Travel Solutions and complies with the requirements of the EU GDPR Regulation, in particular Art. 28. FCM Travel Solutions is subject to compliance with the EU GDPR regulation.

7. Visitor rights

The visitor has the following rights, in accordance with the above-mentioned European regulation:

- **Right of access and communication of data**

The visitor has the right to access and consult the personal data concerning him/her stored by EATG. The visitor can also find out how EATG obtained them and to whom they are communicated.

In view of EATG's obligation of security and confidentiality in the processing of personal data, the visitor's request for access and consultation of data will be processed subject to proof of identity, in particular by producing an electronic or paper copy (accompanied by a signature) of his identity card during the period of its validity. The request is, in all cases, free of charge for the visitor.

However, EATG may object to manifestly abusive requests (for example, by their number or repetitive or systematic nature).

- **Right to rectify data**

The European regulation allows visitors to request the rectification, updating or deletion of data concerning them which may prove to be inaccurate, erroneous, incomplete or obsolete.

- **Right of opposition**

The visitor has the right to object to the processing of data in the following two situations:

- where the exercise of this right is based on legitimate reasons, or
- when the exercise of this right is intended to prevent the data collected from being used for commercial prospecting purposes.

- **Right to erase**

The visitor has the right to request and obtain the deletion of data concerning him or her held by EATG.

EATG will respond to the visitor's request if:

- the personal data are no longer necessary for the purposes for which they were collected;
- the data processing was based exclusively on the visitor's consent and the visitor withdrew his consent;
- the visitor objects, for justified reasons, to the processing.

In any event, the deletion request may be refused by EATG if the request is necessary to:

- the exercise or defense of legal rights;
- compliance with a legal or contractual obligation on the part of EATG;
- the processing is necessary to respect freedom of expression and information;

- other reasons in the public interest to retain personal data, such as for health purposes or scientific and historical research;
- to establish a legal claim.

- **Right to data portability**

The visitor may request that his or her personal data be transmitted to a controller identical to EATG. The visitor can therefore request EATG to transmit the data in a structured, commonly used and machine-readable format.

- **Modalities for exercising rights**

The above-mentioned rights may be exercised by sending a letter to EATG's address or by sending an e-mail to the following addresses: *communication@eatg.org* or *office@eatg.org*.

8. Response times

EATG will respond to the visitor's request by means of a response formulated on the basis of a mode identical to that used for the exercise of its right by the visitor.

EATG undertakes to respond to any request for access, rectification or opposition, deletion or any other additional request for information within a reasonable time and in any event within a maximum period of 1 month from receipt of your request.

Depending on the complexity of the request, the response time may be extended to 3 months in accordance with the applicable European regulation.

9. Persons entitled to access personal data

Only EATG staff members and administrators are authorised to consult personal data, with the exception of the application of point 4 above. These persons have a reasonable need for the data due to the tasks and missions entrusted to them or the needs related to EATG's activity.

10. Authorized service providers and transfer to a third country of the European Union

EATG also informs visitors that it uses authorised service providers to facilitate the collection and processing of the data provided. These service providers are located within the European Union.

EATG has previously ensured that the service providers have implemented adequate guarantees and that strict conditions regarding confidentiality, use and data protection are respected.

11. Complaint to the competent authority

EATG hopes that any possible difficulties related to the processing of personal data will be resolved through dialogue. However, if this cannot be the case, the visitor has the right to lodge a complaint with the Data Protection Authority.

The Data Protection Authority is located at rue de la Presse 35 in 1000 Brussels, can be contacted by telephone on +32 2 2 274 48 00 or by e-mail at *contact@apd-gba.be*.

12. Downloads and multimedia files

All documents, files or downloadable media made available by EATG on its websites are freely accessible. Although every precaution is taken by EATG to ensure that only authentic downloads are available, EATG advises users to verify their authenticity using third-party anti-virus software or similar applications.

II. COOKIE POLICY

When first connecting to EATG websites, the visitor is informed that browsing information may be stored in files called "cookies".

A cookie is an invisible piece of information stored by a website within the computer's Internet browser. This "cookie" can be retrieved during a subsequent visit to the same site. The "cookie" cannot be read by a website other than the one that created it. Most "cookies" only work for the duration of a session or visit. None of this information is disclosed to third parties except where EATG has obtained the prior consent of the visitor or where disclosure

of the information is required by law, by order of a court or any administrative or judicial authority authorised to take cognizance thereof.

This use is made by EATG in order to facilitate navigation on EATG websites.

Some cookies are exempt from prior collection of the visitor's consent insofar as they are strictly necessary for the operation of the websites or have the exclusive purpose of allowing or facilitating communication by electronic means. These include session ID, authentication and interface customization cookies. These cookies are entirely subject to this policy insofar as they are issued and managed by EATG.

Other cookies, issued by third parties, are described as "persistent". These remain in the visitor's terminal until they are deleted or expired.

As such cookies are issued by third parties, their use and storage are subject to their own privacy policies, the links to which are set out below. This cookie family includes audience measurement cookies, advertising cookies (which EATG does not use) and cookies for sharing social networks (including Facebook, Instagram, Pinterest).

Audience measurement cookies collect statistics about the use and usage of various elements of the website (such as content/pages visited). This data contributes to improving the ergonomics of the EATG website.

Social network sharing cookies are issued and managed by the publisher of the social network concerned. Subject to the visitor's consent, these cookies make it easy to share some of the content published on the EATG website, in particular through a "button" sharing application depending on the social network concerned.

Four types of social network sharing cookies are available on the EATG website:

- Facebook, whose cookie policy is available by clicking on the following link: <https://fr-fr.facebook.com/policies/cookies/>
- Twitter, whose options dedicated to controlling or restricting the use of cookies as well as the cookie usage policy can be viewed via the following link: <https://support.twitter.com/articles/20170518#>
- You Tube, whose options dedicated to controlling or restricting the use of cookies as well as the cookie usage policy can be viewed via the following link: <https://policies.google.com/technologies/types?hl=fr&gl=fr>
- Instagram, whose options dedicated to controlling or restricting the use of cookies as well as the cookie usage policy can be viewed via the following link: <https://help.instagram.com/1896641480634370?ref=ig>
- LinkedIn, whose cookie policy is available by clicking on the following link: <https://www.linkedin.com/legal/cookie-policy>

Most Internet browsers are configured by default so that cookies are allowed. The browser used by the visitor allows the standard settings to be modified so that all cookies are systematically rejected or only part of the cookies are accepted or rejected depending on their origin.

However, refusing to accept cookies may affect the visitor's experience and access to certain services or features of the site.

If necessary, EATG declines all responsibility for the consequences related to the deterioration of browsing conditions that occur due to the refusal, deletion or blocking of cookies necessary for the operation of the site. These consequences cannot constitute damage and no compensation can be claimed as a result.

Each Internet browser has its own cookie management settings. To learn how to change your cookie preferences, the links below provide the visitor with help on how to change your cookie preferences.

Chrome: <https://support.google.com/chrome/answer/95647?hl=fr>

Firefox: <https://support.mozilla.org/fr/kb/activer-desactiver-cookies-preferences>

Internet Explorer: <https://support.microsoft.com/fr-be/help/17442/windows-internet-explorer-delete-manage-cookies>

Safari: https://support.apple.com/kb/ph21411?locale=fr_CA