**Privacy policy**

This privacy policy governs data processing within the Alumni Europae ASBL website, Av. Huart Hamoir 48, 1030 Bruxelles, Belgium [admin@alumnieuropae.org](mailto:admin@alumnieuropae.org) (responsible). The following is a summary of what data we collect and how we process it.

**Roles and Responsibilities**

We adopt appropriate data processing practices and security measures to protect against unauthorised access to your personal information stored on our website. Sensitive and private data exchange between the website and our members happens over a SSL secured communication channel and is encrypted and protected with digital signatures.

Access to the database is supervised by the Data Protection Officer elected by the board. Members of the board are elected by the members of the association as prescribed in the statutes of the association available at <https://alumnieuropae.org/about-us/legal/>

When sharing confidential information within Alumni Europae ASBL, members of the association will only use the following secure channels: certified e-mail containing either written information or digital media, or physical meetings. Sensitive information may be shared using e-mail, but the content is password protected and the password sent by other channels (snail mail or telephone).

We use third party service providers to help us operate the Site or administer activities on our behalf, such as sending out newsletters or surveys. We share your information with these third parties for those limited purposes provided that you have given us your permission. Third parties accept, by working with Alumni Europae, not to share this information elsewhere.

Our website is operated for us by Paulbergman GmbH (<https://www.alumnii.de>) as an order data processor. All data collected within the scope of this website will be processed by Paulbergman GmbH. If you have any questions about data protection, please contact [admin@alumnieuropae.org](mailto:admin@alumnieuropae.org). There you will reach our data protection officer Thomas Fairhurst the person responsible for data protection.

**If you visit our website as a visitor...**

... then we collect data from you which you transmit in connection with the call of a website. This applies in particular to the date and time of website access, your IP address, source of access (the so-called referrer) and data on your operating system and browser. We also collect information about which subpages you visit. As long as you do not transmit your identity to us subsequently, this data does not allow us to deduce your identity. However, your Internet provider can infer your identity from your IP address. We collect this data for the continuous improvement of our offer as well as for the analysis and defence against attacks and to exclude misuse. All personal data will be deleted automatically after 6 months at the latest.

Our website also uses cookies. These are small text files that are stored on your computer. This allows us, for example, to treat you as a logged-in user for several days after you have logged in, or to record whether you have visited the site in the past. We also use cookies to track the frequency and number of users of the site and how they use the site, for example, how long they stay on which page and what content they use on our site. We use the open source program Matomo and store the data exclusively on our servers. All usage data is combined into pseudonymised usage profiles. If you do not agree to the use of cookies, we recommend that you configure your web browser accordingly. However, this may result in you not being able to use all the functions of our website. You can also disable tracking by Matomo here:

We therefore process data in connection with cookies in order to design and continuously improve our offer in line with requirements and to exclude misuse. All personal data is automatically deleted after 24 months at the latest.

When calling up individual subpages, code from third-party providers is integrated, especially for displaying maps. In this case, the above data will also be transferred to the third party provider. We use code from Google Inc. and your data will be transferred to the United States of America.

**If you register for the newsletter or use the contact form...**

... then, in addition to the above-mentioned data, we collect all data that you enter in the corresponding forms. We store this data on the basis of your voluntary consent. When processing contact enquiries, the data collected by us will be deleted after the enquiry you have made has been dealt with or, if necessary, further stored on the basis of the initiation of a contractual relationship. You can delete your personal data in connection with a newsletter subscription yourself by clicking on a link at the end of the newsletter.

Google reCAPTCHA is used to check and avoid interactions on our website through automated access, e.g. through so-called bots. This service is provided by Google LLC, Gordon House, Barrow Street, Dublin 4, Ireland, hereinafter referred to as "Google". By being  certified under the [EU/US Privacy Shield](https://www.privacyshield.gov/participant?id=a2zt000000001L5AAI&status=Active), Google guarantees that the EU's data protection requirements are also met when data is processed in the United States.

This service enables Google to determine which website is sending a request and from which IP address the so-called reCAPTCHA input box is used. In addition to the IP address, Google may also collect other information necessary for the provision and guarantee of this service.

The legal basis is Art. 6 para. 1 lit. f) DSGVO. Our legitimate interest lies in the security of our Internet presence and in the defence against unwanted, automated access in the form of spam or similar.

Google offers further information on the general handling of your user data at <https://policies.google.com/privacy>.

**If you register as a member...**

... then we collect all data that we also collect for non-registered visitors to our website (see above). In addition, we collect data that is generated during interaction with our system. This is how we store contact details and images that you enter or upload into the system. We store messages you send to other members, comments you make on the platform, groups you join, your tags, and your participation in events. In order to regularly improve the relevance of our mailings, we record whether you have opened and clicked on email newsletters.

We collect all these data in order to fulfil our contractual obligations to you as a member of the association and to pursue our association's purposes.

To fulfill our obligations we need at least your name, graduation year, school attended, nationality and an email address. Membership in our association is not possible without the provision of this data. All other data is voluntary and allows us and other members to contact you more easily. Alumni Europae aims to regularly produce anonymous statistical analyses of trends and behavioural patterns of graduates once they have left school. We may choose to share or sell these anonymous statistical analyses of trends with partner members with the goal of improving the European School system. Partner members will not have access to personal data of other members but only anonymous statistical analyses of trends and behavioural patterns. Partner members will be approved by the Alumni Europae board in conjunction with the goals of the association set out in the constitution and the Strategic Plan. Partner members will be added to this privacy policy no longer than 30 days after being approved in line with the statutes of the association. Members will be informed of the addition of new Partner members in the terms described in this policy.

You can view the data stored about your person in the settings area of your profile, this allows you to obtain information about the stored data. In addition, you have the option of deleting your data in the settings area. On the basis of our association purpose we make your contact data available to other members of the association. In your profile settings, you can control exactly which data is visible to other members. All personal data are stored during your membership in our association and deleted after leaving the association.

**DATA integrity**

The Alumni Europae database administrators will verify the integrity of the collected data at least once a year. Although every effort is made to keep the database maintained and integral, Alumni Europae is not responsible for the integrity of the data supplied by members.

**Compliance with children's online privacy protection act**

Protecting the privacy of the very young is especially important. For that reason, we never collect or maintain information at our Site from those we actually know are under 13, and no part of our website is structured to attract anyone under 16.

**Identity Verification**

Although every effort is made to verify the identity of Alumni Europae members, Users are solely responsible for determining the identity and suitability of others with whom Users may interact through our Site. We do not endorse any person who uses or registers to our Site. We do not investigate or verify any member’s reputation, conduct, morality, criminal background, or any information members may submit to the Site. We encourage Users to take precautions when interacting with other members, particularly when meeting a stranger in person for the first time.

**Member-Hosted Events**

Members may organise in-person meetings and host events for other Alumni Europae members; however, these events are not sponsored or endorsed by Alumni Europae and members attend such meetings and events at their own risk.

**Interaction with Other members**

Users have sole responsibility when interacting with other members. Our Site provides a platform for members to learn about one another, arrange stays and travel, engage in activities and communicate with one another. Alumni Europae is not a party to, has no involvement or interest in, makes no representations or warranties as to, and has no responsibility or liability with respect to any communications, transactions, interactions, disputes or any relations whatsoever between Users and any other member, person or organisation. Users are solely responsible for their interactions with other members of our Site. We reserve the right, but have no obligation, to monitor interactions between Users and other members of our Site.

If you enter your address on the platform, then this address (in anonymous form, without your name) will be transmitted to Google Inc. and thus to the United States of America in order to determine coordinates for your address. This allows us to display your approximate location on a map.

From time to time we contact you by email to inform you about current developments in and around the association. You have the possibility to object to the receipt of corresponding newsletters in your profile settings. If this should be necessary for the fulfilment of our association duties (e.g. to convene a general meeting), we reserve the right to send you e-mails even if you have objected to the receipt of newsletters in general.

As part of the payment function, we record all financial transactions between you and us. Your contact and payment data will be processed by the order data processor Stripe Inc. (<https://www.stripe.com>) is saved. This includes in particular that your data will be transferred to the United States of America. We use the specialized payment service provider Stripe to ensure the highest possible security of your data. Also after deletion of your profile data we store data to your payments in order to comply with our legal obligations and to enable a complete accounting. Personal data relating to your payments will be deleted after all relevant deadlines have expired.

If your data is transferred to the United States of America, this will only be done in cooperation with companies that offer all relevant guarantees under the EU/US Privacy Shield. Currently these are  Google Inc. (1600 Amphitheatre Parkway Mountain View, CA 94043, USA) and when using the  Stripe Inc.  payment function. (185 Berry Street, Suite 550, San Francisco, CA 94107, USA)

You have the following rights under the Basic Data Protection Ordinance (DSGVO):

* You can obtain information about your personal data processed by us. In particular, this shall include information on the purpose of the processing, categories of personal data, categories of recipients and planned duration of storage. You can find an overview of this in your profile settings.
* You can request the correction or completion of the data stored by us. You can also correct the data yourself in your profile settings.
* You can request the complete deletion of your personal data processed by us. The easiest way to do this is to use the corresponding function in your profile settings.
* Within the framework of the provisions of the DSGVO, you may request that the processing of your personal data be restricted.
* You may request that your personal data be disclosed in a machine-readable format and transferred to another responsible person.
* You can revoke all consents to which we refer in the processing of your data at any time. The easiest way to do this is in your profile settings.
* If we process your data on the basis of a justified interest, you have the right to object to this processing.

Should you have any questions or objections regarding data protection and to exercise the above rights, please contact [admin@alumnieuropae.org](mailto:admin@alumnieuropae.org), we will be happy to answer your questions. You also have the right to lodge a complaint with the competent supervisory authority. The competent supervisory authority can be found at <https://www.datenschutz.de/>.

Changes to our Internet presence may necessitate changes to this data protection declaration. We reserve the right to make such changes. If these are changed, we will post a notification on the main page of our Site and send you an email. We encourage Users to frequently check this page for any changes to stay informed about how we are helping to protect the personal information we collect. You acknowledge and agree that it is your responsibility to review this privacy policy periodically and become aware of modifications. You will always find the current data protection declaration here (<https://alumnieuropae.org/privacy/>).