

Eurogiro Privacy Statement - October 2018

Introduction

Eurogiro A/S (hereinafter “EUROGIRO”, with registered office at Toldbodgade 55 B, DK-1253 Copenhagen, Denmark) are committed to protecting your privacy.

EUROGIRO takes data protection, including the protection of personal data, very seriously. Eurogiro has always been working based on a principle of high ethics in the handling and storing of personal data.

In this Privacy Statement, the terms “Controller”, “Data Subject”, “Personal Data”, “Processor” and “Processing” shall have the meaning given to these terms in the EU General Data Protection Regulation (GDPR) (Regulation (EU) 2016/679) (hereinafter referred to as “EU Data Protection Law”).

The Privacy Statement explains how your Personal Data is processed by EUROGIRO, as data Controller for the data Processing activities described in this statement, when collected through our website.

Our websites include amongst others:

- Eurogiro.com
- other URLs that redirect to Eurogiro.com.

This Statement does not apply to any Personal Data Processing by EUROGIRO when providing its services to Eurogiro members, that has a connection agreement with EUROGIRO. Our other data Processing activities are covered by EUROGIRO Data Protection policy. It explains how we process Personal Data that our members encapsulate in EUROGIRO messages or files (“message data”).

We may modify this Statement from time to time. Please check it periodically for changes, in particular when you submit Personal Data on our websites.

EUROGIRO Purposes

EUROGIRO processes Personal Data collected on our website or through the interactions you have with us, for the following purposes (together “EUROGIRO Purposes”):

- The organization of events
- Sending commercial communications, newsletters and other member communications
- The operation of our websites (IP addresses, cookies, web acceleration, Data security, Data anonymization for reporting and statistics)
- For the exercise of EUROGIRO's obligations, rights and remedies as set out in this Privacy Statement.

For these purposes, EUROGIRO will generally process the following data pertaining to you: IP address, identification information (e.g. last name, first name, job title, contact details - such as mobile, landline, email address - company name, etc.), login and password, the history of your

interactions with EUROGIRO (e.g. attendance dates to events, photograph, downloads from our websites, connection logs, etc.), your financial information (e.g. credit card details for billing purposes after your subscription to our events, invoicing history), etc.

Where applicable, we indicate whether and why you must provide us with your Personal Data, as well as the consequences of failing to do so. If you do not provide your data when requested, you may not be able to benefit from our services, if that data is necessary to provide you with the services or if we are legally required to collect it.

You may also find more information on the use of your Personal Data (as a EUROGIRO member) for EUROGIRO governance and for the provision of EUROGIRO services and products in the EUROGIRO Data Protection Policy.

Events

When you register for an event, we collect personal data related to your subscription and participation to the event.

In general, EUROGIRO will process your personal data supplied during your registration, for purposes relating for event registration and administration, accommodation services, event security management, accounting and records keeping.

For these purposes, EUROGIRO will process the following data pertaining to you: your last name, first name, job title, company name, attendance dates, contact details (e-mail address, mobile number ...), photograph and credit card details (in case of a hotel reservation).

Participants list includes the information mentioned above of all participants and will be accessible by all participants and speakers.

Use of wi-fi during an event is monitored for security and quality control purposes. In this regard, only your IP address and traffic data are initially processed (without any link to your contact details). Only if further investigation is needed, your personal details may be used in order to contact you to gather further information or to discuss our concerns or be able to respond to a threat. Illegal use or serious security breaches may be reported to the authorities or any competent law enforcement agency.

EUROGIRO reserves the right to photograph and videotape all events and participants and to use and license such photographs and videos in any internal and external communication referring to the event, such as on its websites and intranet or other commercial purposes related to EUROGIRO's business, products or services.

EUROGIRO receives names of potential speakers directly from either the members of its community or its staff. EUROGIRO therefore has a legitimate interest to process the personal data of the (potential) speakers (name, first name, email) for the purposes of identifying, selecting and/or confirming speakers, managing the invitations and related logistics (e.g. visa, hotel booking, etc.) and keeping information and statistics about the speakers' history.

The speakers' (potential or confirmed) personal data are kept for 5 years after they were added in our database or after the speaker's last performance.

EUROGIRO reserves the right to sub-contract (a) part(s) of its data processing operations related to the registration to events to third party service providers. In such case, the appointed third-party service provider may only process your data on behalf of and under the instructions and sole control of EUROGIRO.

You acknowledge and agree that, where EUROGIRO sub-contracts part(s) of its data processing operations to a third-party service provider, this may involve the transfer of your personal data to a country located outside the European Economic Area. Where such country does not offer a level of data protection considered as adequate under applicable the EU Data Protection Laws, EUROGIRO will ensure the lawfulness of such transfers by a legitimate data transfer agreement (i.e. the Model Contractual Clauses as adopted by the European Commission) or any other valid arrangement.

Newsletters and Other Customer Communications

EUROGIRO has a legitimate interest to Process Personal Data that you submit on our websites or during your interactions with us (e.g. subscribe to an event), to provide you with commercial communications related to the EUROGIRO products and services that you use or purchased or the event to which you participated. In addition, you can consent to receiving other commercial communications pertaining to EUROGIRO's events, products and services, and its newsletters.

You have the right to opt-out for his type of communication at any moment without giving a motivation.

To monitor the effectiveness of email, online advertising and social media campaigns as well as the level of engagement on eurogiro.com web pages, EUROGIRO measures the ratio of clicks on specific links provided through these different channels, and other online interactions, such as searching a page or watching a video. These types of processing are on aggregated data.

Your data will be kept no longer than two years after the last interaction between EUROGIRO and you or until the information is no longer necessary for the purposes for which we process it, unless we are required by law to keep the information for a longer period of time.

Operation of our Websites

EUROGIRO has a legitimate interest to Process your Personal Data for the operation of its websites and as detailed below:

IP Addresses

For our internal purposes, we may use IP addresses (the Internet address of your computer) stored in web logs to generate aggregate statistics on the usage of our websites, such as volume, traffic patterns and time spent on a page.

Cookies

Our websites use cookies. Cookies are small pieces of information that are stored by your browser on your computer's hard drive or in your browser memory.

The information stored with cookies include your name, first name, language preference and navigation settings, login ID, and IP addresses.

In addition, our websites use Google Analytics, a service which transfers traffic data to Google servers in the United States.

For a detailed description on the use and purposes of cookies via this Website, please consult our related [Cookies Policy](#).

Web Acceleration Services

For purposes of accelerating the consultation of our websites, we use the services of a supplier specialized in web acceleration services. This requires caching the content of our websites on a substantial number of servers worldwide.

This supplier only processes data on our instructions for these purposes, provides sufficient guarantees in respect of technical and organisational data security measures, and has committed to notify us in case of a security breach compromising your Personal Data (see also 'Sharing Data' section below).

Hyperlinks to other websites

Our websites may contain links to other websites not owned or operated by EUROGIRO. EUROGIRO is not responsible for the privacy practices of these websites.

Data Security

We are committed to protect your Personal Data against accidental or unlawful destruction, accidental loss, alteration, and unauthorized disclosure or access. Therefore, we monitor and record the data exchange (IP address, timestamp, volumes), both incoming and outgoing, in order to preserve the security, integrity and availability of our infrastructure. In addition, in case of suspicious activity, EUROGIRO might collect data (including personal data) from various sources (e.g. public sources, threat intelligence providers, etc.) in order to start and manage its own investigation.

These data are kept for up to one year. Data can be kept longer when a security issue has been encountered and evidences need to be kept for EUROGIRO to exercise its rights and remedies.

Any Personal Data collected during this process may be shared by EUROGIRO with the relevant authorities.

Please be aware that we cannot ensure the security of your data on your computer or during transmission over the Internet. In this regard, we advise you to take every possible precaution to protect Personal Data stored on your computer and transiting on the Internet.

Data anonymization for reporting and statistics

EUROGIRO has a legitimate interest to produce reports and statistics about the usage of its websites (e.g. visitors per day, geographical reach, etc.).

These reports will be fully anonymized.

Data Submitted on Behalf of Someone Else

If you provide Personal Data of another person to EUROGIRO for the purposes mentioned above, you shall ensure that (i) this person has been duly informed about EUROGIRO's right to process such Personal Data as set out herein and has been provided with the present Privacy Statement, (ii) such Personal Data are collected and supplied in accordance with applicable legislation and without infringing such person's or any third party rights and (iii) you have obtained his or her prior consent where needed.

Sharing Data

When required for the EUROGIRO Purposes, we may share your data with other offices and companies in the EUROGIRO group, carefully selected suppliers (e.g. security specialists, maintenance suppliers, marketing/events organisation suppliers), or other selected third parties.

Before sharing your data, we require such third parties to only process your Personal Data on our instructions and to provide sufficient guarantees in respect of the technical and organizational security measures protecting the data processing activities.

Such EUROGIRO offices or third parties may be located in or outside the European Economic Area (EEA), including in countries that do not offer a level of data protection considered as adequate under a EU Commission adequacy decision.

In the latter case, we ensure the lawfulness of such transfers by:

- agreeing with other EUROGIRO offices or companies on the standard contractual clauses approved by the European Commission;
- agreeing with third parties on the most appropriate statutory, contractual, or self-regulatory basis (for example Privacy Shield certification) to allow such transfers.

You have a right to obtain more information about these safeguards used to transfer data outside of EEA, by contacting us (see below).

Your Rights

Your Personal Data will not be kept by EUROGIRO for longer than necessary, after which your Personal Data will be deleted. As general rule, and unless specified differently in this Privacy Statement, EUROGIRO will keep your data for the duration of the statute of limitation applicable to our relationship with you.

During this period, you have the right to access, correct, restrict, receive a copy and even erase your own Personal Data in accordance with the Data Protection Laws, and you can object to the processing of your Personal Data for direct marketing purposes.

In addition, where relevant, you can withdraw your consent at any time and without motivation for those types of data Processing to which you consented. Note however that this does not affect the lawfulness of the data Processing based on your consent before the withdrawal.

Finally, in some circumstances, you have as well the right to object to the Processing of your Personal Data mentioned above.

You may exercise your data protection rights by sending your request together with a proof of your identity to EUROGIRO (see below).

If you have any other questions or complaints regarding the Processing of your Personal Data, you can also contact EUROGIRO or lodge a complaint with the supervisory data protection authority in your country of residence, place of work or where an incident took place. In Denmark, the data protection authority is:

Danish data protection authority
Borgergade 28, 5
1300 København K
ph: +45 3319 3200
mail: dt@datatilsynet.dk
web: www.datatilsynet.dk

Contact

You may exercise your rights and address any questions to EUROGIRO:

- by letter to EUROGIRO A/S, Toldbodgade 55 B, DK-1253 Copenhagen, Denmark
- by e-mail to eurogiro@eurogiro.com.