# PRIVACYVERKLARING E.S.T. FELLENOORD

On the 25th of May 2018 the European law of General Data Protection Regulation (GDPR) will take effect. This regulation is an addition to European privacy laws and contains clear guidelines which companies have to follow. In this document E.S.T. Fellenoord provides information of the processing of data of her customers (later: members). As mentioned on the registration form people will, by clicking send, agree with the processing of the personal data provided in that same registration form.

By agreeing to the privacy statement you agree with the statements and terms stated in this document. Furthermore we would like to show the reader their rights once they agreed with statement, which can be found on page 4

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# The processing of personal data

The personal data provided during the registration can be divided into two categories, namely **Mandatory data** and **Non-mandatory data**. An explanation:

#### - Mandatory data

The mandatory data refers to the data necessary for a complete registration at E.S.T. Fellenoord. This data contains the following fields, in the same order as they appear on the registration form

- o Gender
- o Initials
- Firstname
- Prefix
- Last name
- Date of birth
- Phone number
- Street, Street number, Zipcode and City
- Country
- Email address
- Bank Account Number
- o 'I would like to be addressed in'
- Agree to terms and conditions

This data is used for registering at the KNLTB (Dutch tennis federation) and the deduction of the yearly contribution. It is therefore necessary for these fields of data to be saved to become a member of E.S.T. Fellenoord. Even when not accepting the privacy statement, this data will be kept unless the member will enact on their rights which are described on page 4

#### - Non-mandatory data

The non-mandatory data refers to the data not necessary for a complete registration at E.S.T. Fellenoord. This data contains the following fields, in the same order as they appear on the registration form

- o Educational Institution
- Name of study
- o 'Did you play tennis before?'
  - In case the user picks 'yes', also KNLTB number, single rating and double rating
- Sportscard number
- o This committee I would like most
- Breakpoint festival

This data is used for further contact from the board and specific interests we see as 'useful' for members of our association for possible enrichment of personal and social development. These fields have to be filled in for completion of the registration form but are deleted as soon as the user does not agree with the privacy statement.

Removing or temporary unavailability of this data is described on page 4.

## Identity and contact details of the 'Owner'

Identity (per 25-05-2018): Daan Hendriks

Contact details (per 25-05-2018): Phone number: +31642114794

Email: secretaris@fellenoord.nl

### Goals for processing personal data

As described in 'The processing of personal data', the mandatory data is used for registration at the Dutch tennis federation (KNLTB) and the annual contribution. The non-mandatory data is used for further contact from the board and specific interests we see as 'useful' for members of our association for possible enrichment of personal and social development. These fields have to be filled in for completion of the registration form but are deleted as soon as the user does not agree with the privacy statement.

Furthermore data is used for both association and activity statistics, which are fully anonymized and shared with the members of E.S.T. Fellenoord. The statistics of the website (visiting numbers, locations and IP-addresses) are managed by Google Analytics and are also anonymized. This data is not impacted by this privacy statement

In case of a data breach or theft of personal data, we will report this to the Autoriteit Persoonsgegevens (Dutch personal data authority). This will happen within 72 hours of the initial breach to prevent risks of the rights and freedom of our members. We will also send a message to all our members that a breach has happened, combined with fitting advise.

Members have the right to request for their data to be deleted, including but not limited to their personal data and their activity data. This is described on page 4.

# Legal basis of personal data processing

The processing of personal data is based on the legal basis of permission, and thus can be revoked at any point. How this can be done is again described on page 4

# Receivers of personal data

Companies and people who receive the personal data are limited to the current board (See the website for more information (<a href="https://www.fellenoord.nl/joomla/index.php/en/de-club-2/bestuur-2">https://www.fellenoord.nl/joomla/index.php/en/de-club-2/bestuur-2</a>), who are free in using the data within the association for activities and contact about these activities, and the Dutch tennis federation (KNLTB) who will need data for registration

Storage period of personal data

Personal data collected during the registration for both the association as well as an activity will not be erased unless one requests for removal in an email to the secretary of E.S.T. Fellenoord (secretaris@fellenoord.nl).

## Rights that members have and how to apply them

Members can file a request for complete removal of all data (also in back-ups). This request, according to the GDPR, must be honored in case:

- Personal data is no longer used for any purpose according to members
- The permission of use of personal data is withdrawn by the member
- The later described right of objection is used
- There is no legal basis on which the personal data is used
- The storage period of personal data has expired
- The member is under the age of 16 and its personal data is gathered through a website or app

When personal data is shared with other parties, in our case the KNLTB, members can also request for removal of data at those parties

NOTE: In some cases a successful request for removal can be refused

This can be done in case:

- The processing is necessary to act upon the right of free speech and information. With this, the GDPR follows its right to the principal that privacy and free speech are equal constitutional laws
- The organization processes the data because it is required by law
- The organization processes the data to enact on general duties (possibly required by law)
- The organization processes the data for a common importance in the field of public health
- The organization has to archive the data for common interest
- The data is necessary for a lawsuit
- General exceptions of privacyrights

In some cases a member can demand that further processing of personal data is temporarily stopped. In this case we are also not allowed to remove or delete personal data which is no longer used

Withdrawing permission of use of personal data can be done in an email to <u>secretaris@fellenoord.nl</u>. In case the previously used data has to be removed this must be mentioned in the email.

# Filing a complaint with the Autoriteit Persoonsgegevens

If a member suspects that their personal data is processed in a way that is contrary to the privacy laws, a member can file a privacy complaint with the Dutch authority. This can be done on the following website: (<a href="https://autoriteitpersoonsgegevens.nl/nl/zelf-doen/privacyrechten/privacyklacht-indienen">https://autoriteitpersoonsgegevens.nl/nl/zelf-doen/privacyrechten/privacyklacht-indienen</a>

#### Personal data outside the EU

As of now we do not share personal data with any country outside the European Union, so this is not applicable.