



CIRCLES

Website Privacy Notice



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Document Identification

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Introduction

The document provides the content of the privacy notice to be uploaded on the [CIRCLES website](#). The privacy notice aims to inform website visitors about the personal data which may be collected through it, the purpose of the collection and their rights associated with this data.

The document was prepared to ensure the compliance of WP10 partners involved in the management of the website and the sending of a newsletter to the project's stakeholders (Task 10.1) with the requirements of the General Data Protection Regulation.

About us

Hague Belgium BVBA (hereinafter referred to as “Hague”, Rue Belliard 40, 1040 Brussels, Belgium and the European Food Information Council (hereinafter referred to as “EUFIC”), Rue des Deux Églises 14, 1000 Brussel, Belgium assume the role of joint data controllers (hereinafter referred to as “we”).

Hague and EUFIC collect and process personal data in compliance with applicable data protection laws, including the General Data Protection Regulation (“GDPR”). In particular, Hague and EUFIC commit to only collect and process personal data that is: processed fairly, in a transparent way and based on valid legal grounds; obtained for specific lawful purposes; adequate, relevant and not excessive; accurate and kept up to date; not held for longer than necessary; protected in appropriate ways and not transferred outside of the European Economic Area, unless adequate protective measures are in place.

For the purpose of sending bi-monthly newsletter, Hague relies on MailChimp. By taking proper measures, it ensures that unauthorised persons do not access your personal data, protects its confidentiality and integrity, and prevents its loss or unintentional destruction throughout the entire time of the processing.





What personal data do we collect?

Personal data means any information relating to an identified or identifiable natural person; an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identify of that natural person.

On the CIRCLES website the following categories of personal data may be collected to the extent necessary to achieve the purposes outlined in this privacy notice:

- Identification data (e.g. first name, surname, pictures, IP address, cookies)
- Contact data (email address, zip code);
- Personal information (e.g. age, date of birth, gender, citizenship).

How and for how long will we be storing your personal data?

Personal data collected on the basis of your explicit consent will be stored in an electronic database of personal data.

Hague and EUFIC will only keep personal data for the time that is strictly necessary to achieve the purpose(s) for which they were collected, e.g. for the duration of the CIRCLES project, and for three years thereafter.

What are the purposes for processing personal data?



Your personal data is handled, collected and processed by the joint controllers only within the scope of the purposes for which the data has been disclosed.

We commit not to lend or sell your personal information to a third party without prior notice and your explicit written consent, and we will not process it in any other way that is not compatible with these purposes.

In accordance with your specific consent, your personal data will be used for the purposes defined below:

- For websites administration purposes: EUFIC processes identification data from individuals who register themselves on the CIRCLES websites and give their express consent to receive newsletters from CIRCLES.
- For website usage statistics: EUFIC relies on web analytics service provided by Google. Cookies (small text files stored locally on your computer) are used to help analyse how people use this website. EUFIC will use this information to generate reports on the website usage. EUFIC will only share the collected information with third parties when legally required to do so. Your IP-address will not be combined with that of other websites or other data sources that are available to EUFIC.
- For sending newsletters: Hague processes personal data for the purpose of sending updates about the project's developments. An explicit opt out option is made available to data subjects who can unsubscribe from the newsletters mailing list.

Your rights as data subjects

As data subject, you have the following rights with respect to personal data we hold about you, subject to applicable legal restrictions:

- **Right of access** to your personal data;
- **Right to rectification** of incorrect or incomplete personal data;
- **Right to erasure** of your personal data;
- **Right to restriction** of processing of your personal data;





- **Right to data portability**, i.e., the right to receive the personal data concerning you in a structured, commonly used and machine-readable format and to transmit those data to another controller;
- **Right to object** to all or part of the processing, when legally allowed;
- **Right not to be subject to automated individual decision-making**, including profiling within the limits set out by the law;
- **Right to withdraw consent at any time** when we process your personal data based on your consent;
- **Right to lodge a complaint with a supervisory authority** in the EU.

Twitter

The homepage of CIRCLES contains a Twitter widget which connects to Twitter.com. By loading this widget Twitter Inc. is notified that you visited this page. Twitter uses this information to track your visits across the internet. This information will be stored up to 30 days in the United States. This information can be used to serve you personalised advertisements. For more information consult Twitter's [Privacy Policy](#).

Instagram

The homepage of CIRCLES contains an Instagram widget which connects to instagram.com. By loading this widget Instagram is notified that you visited this page. Instagram uses this information to track your visits across the internet. This information will be stored up to 30 days in the United States. This information can be used to serve you personalised advertisements. For more information consult Instagram's [Data Policy](#).



Withdrawal of consent for processing personal data

You have the right to withdraw your consent for the processing of personal data for one or all of the purposes for the processing of personal data at any time.

If you wish to exercise this right or if you are not satisfied about how Hague and EUFIC protect your privacy, you should address your request by, to EUFIC, as data controller at the following address: eufic@eufic.org.

In the event of withdrawing your consent for the processing of personal data, processor will delete all collected personal data and immediately stop processing it.

Personal data breaches

In case your personal data is breached, you will be notified immediately.

In the event of a personal data breach, within the 72 hours after being informed of the personal data breach, we will notify the [Belgian Data Protection Authority](#).

