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## **1. Introduction**

The not-for-profit organisation Avocats Sans Frontières, whose headquarters are located at 140 Avenue de La Chasse, 1040 Brussels (Belgium), registered with the Crossroads Bank for Enterprises (Banque Carrefour des Entreprises) under the company number 0447.404.580, is committed to ensuring that personal data is collected and handled in a transparent, secure, and confidential manner. In particular, we want to protect the privacy of our administrators, members, supporters, donors, suppliers, subcontractors, employees, volunteers, interns, partners, and beneficiaries and to protect their data against losses, violations, errors, unauthorised access, and unauthorised use.

In this information notice, we aim to inform you about how we collect and process personal data. Please read it carefully, as it contains important information about how we handle your personal data and the reasons why we do so.

By supplying your personal data, you explicitly declare that you acknowledge this information notice and accept its contents and the processing of your data.

## **2. Scope of application**

This information notice about data protection applies to all the activities carried out by Avocats Sans Frontières.

## **3. Responsibility for processing data and ASF’s commitments**

Avocats Sans Frontières, whose registered offices are located at 140 Avenue de La Chasse, 1040 Brussels (Belgium) and is registered under the company number 0447.404.580, is responsible for handling your personal data.

When collecting and processing this data, we are committed to respecting Belgian legislation and the *General Data Protection Regulation*, which came into effect on 25 May 2018.

#### **4. Personal data**

Depending on the nature of your activities and your relationship with ASF, you will provide us with the following personal data:

- Personal identification data: surname, name(s), private and professional addresses, previous addresses, private and professional telephone numbers, email address, etc.
- Identification data issued by public services: identity card, passport, driver's licence, and national registration number, etc.
- Electronic identification data: IP addresses, cookies, tracking, etc.
- Financial (identification) data: identification and bank account numbers.
- Personal characteristics: language, age, sex, date of birth, birth place, civil status, and nationality; details related to work permits, right to remain, etc.
- Composition of your household: name of spouse or partner, maiden name of spouse or partner, date of marriage, date of cohabitation contract, number of children, children in your charge, other people in your charge, other members of your household, etc.
- Data relating to professional incidents: data relating to physical health, data relating to situations and high-risk behaviours, etc.
- Data relating to education and training: academic courses, professional qualifications, professional training and certificates, etc.
- Data relating to your professional career: current employment, recruitment, end of employment, career, attendance and disciplinary record, occupational health care, salary, assets held by a member of personnel, work organisation, evaluations, training for the post, security, use of IT, etc.
- Image and sound recordings: films, photographs, video recordings, digital photos, etc.
- Data relating to infractions, convictions, legal services required, etc.

We wish to make you aware that you are responsible for all the data that you provide to us and for ensuring that it is accurate. If your data is not up to date, please inform us immediately.

You are not obliged to provide your personal data, but it will be impossible to provide certain services or to collaborate if you do not give your consent for the collection and processing of certain data.

#### **5. Purposes of processing data and legal basis**

We collect and handle data relating to our administrators, members, supporters, donors, suppliers, subcontractors, employees, volunteers, interns, partners, and beneficiaries.

This data is used for the following purposes: administering the board of directors, managing members, organising general assemblies, public relations, communication, archiving, managing donations, fundraising, managing suppliers and subcontractors, managing and administering personnel and intermediaries, executing contracts we have with them, planning and monitoring activities, and/or respecting legal and regulatory obligations.

The legal bases include the execution of a contract, respect for legal and regulatory obligations, and/or our legitimate interest.

Any processing of sensitive data will be carried out in accordance with the exceptions set out in the General Data Protection Regulation.

#### **6. Duration of data processing**

We store and process personal data for as long as is required by the need to perform the services for which it is being used, your relationship with us (contractual or otherwise), and the relevant legislation.

## 7. Rights

In compliance and accordance with the Belgian legislation relating to data protection and the provisions of the General Data Protection Regulation, we inform you that you have the following rights:

- **Right of access:** you have the right to be informed of the data concerning you that we store and to verify the purposes for which it is used.
- **Right to rectification:** you have the right to require the rectification (correction) of incorrect personal data concerning you, and the right to have incomplete personal data completed.
- **Right to erasure or to restrict the processing of data:** you have the right to ask us to erase personal data concerning you and to restrict how this data is handled in the circumstances and under the conditions stipulated in the General Data Protection Regulation. We can refuse to erase or restrict data that we need in order to process salaries, meet a legal obligation, execute a contract of employment, or if we have a legitimate interest, as long as this data is needed for the purposes for which it was collected.
- **Right to data portability:** you have the right to receive the personal data concerning you that you have provided to us, in a structured, commonly used, and machine-readable format. You have the right to transmit this data to another data controller.
- **Right to object:** you have the right to object to the processing of your personal data for serious and legitimate reasons. You cannot, however, object to the processing of data that we need in order to meet a legal obligation or to execute a contract of employment, or if we have a legitimate interest in it, as long as this data is needed to perform the services for which it was collected.
- **Right to withdraw consent:** if the processing of personal data is based on prior consent, you have the right to withdraw that consent. We will then only use this personal data if we have another legal basis for doing so.

You can exercise the aforementioned rights by contacting ASF:

- By email at [privacy@asf.be](mailto:privacy@asf.be)
- By telephone on +32 (0)2 223 36 54
- By post at 140 Avenue de la Chasse, 1040 Brussels (Belgium)

The person to contact with all general questions and questions about how we handle the data of our suppliers and subcontractors is Nadin Coulibaly.

The person to contact with questions about how we handle the data of our employees, interns, and volunteers is Karin Katreille.

The person to contact with questions about how we handle the data of our board members, members, supporters, and donors is Séverine Degée.

We take great care to ensure that personal data concerning you is handled in a meticulous and legitimate manner, in conformance with the applicable regulations. If you believe, however, that your rights have not been respected or if you feel that your concerns have not been addressed by ASF, you can lodge a complaint with the Data Protection Authority:

Rue de la Presse 35, 1000 Brussels  
Telephone: + 32 (0)2 274 48 00  
[contact@apd-gba.be](mailto:contact@apd-gba.be)

You also have recourse to legal action, if you believe that you have suffered damages as a result of the processing of your personal data.

## **8. Transfers of data to third parties**

Some of the personal data mentioned above will be transferred to and may be handled by third parties (providers of accommodation, external auditors, social security services, insurance, tax authorities, etc.).

It is possible that one or more of these third parties may be located outside of the European Economic Area. Personal data will, however, only be transmitted to outside countries that have an adequate level of protection.

The staff, managers, and/or representatives of these third parties are required to respect the confidentiality of your personal data and can only use this data for the purposes for which it has been provided.

We never give or sell your personal data to third parties for commercial purposes.

## **9. Technical and organisational measures**

We take technical and organisational measures in order to handle data with an adequate level of security and to protect personal data against any destruction, loss, falsification, unauthorised access, or disclosure by mistake to third parties, and against any unauthorised use. The same measures are taken in our offices located outside of the European Union.

Avocats Sans Frontières cannot, under any circumstances, be held responsible for any direct or indirect damage caused by the erroneous or unauthorised use of personal data by a third party.

## **10. Third-party access**

For processing your data, we authorise access to your personal data by some of our employees, interns, volunteers, suppliers, and subcontractors. We guarantee an equal level of protection by imposing contractual obligations on them that are equivalent to those set out in this notice.

## **11. Do you have questions?**

If you still have questions about how your personal data is collected and handled after reading this information notice, you can contact us:

- By email at [privacy@asf.be](mailto:privacy@asf.be)
- By telephone on +32 (0)2 223 36 54
- By post at 140 Avenue de la Chasse, 1040 Brussels (Belgium)