

PLASTICSEUROPE AISBL

PRIVACY NOTICE

This privacy notice explains how We, PlasticsEurope AISBL ("**PlasticsEurope**" or "**We**", "us", "our"), are committed to complying with EU Privacy Law. This privacy notice (the "**Notice**") describes how We, as a controller of Personal Data, process the personal information of certain categories of Data Subjects that are not associated to us.

In carrying out our activities, We process Personal Data relating to consultants, contractors, suppliers, individuals registering for our publications and/or attending events and conferences, officials of the European institutions and EU agencies, EU Member State officials, journalists, and other stakeholders ("**You**") in the policy areas that We are involved in.

We are a data controller. This means that We are responsible for deciding how We collect and use (process) Personal Data about You. We are required under GDPR to notify You of the information contained in this Notice.

1. What Personal Data do We hold about You?

Depending on who You are, We collect different Personal Data from You, for specified purposes and based on a specific legal ground.

Data Subjects	Personal Data Collected	Purposes	Sources	Legal Basis
EU and national government officials and policy stakeholders, including journalists, industry associations, and NGOs involved in the policy areas that the association is active in	Name, job title, email address, name of the organisation, address, phone number, your political party. If you work in an EU institution or agency, your picture and date of birth	Conducting our advocacy activities in the policy fields We are involved in, including contacting You with regard to projects We are involved in and asking You information about the policy areas We are involved in	Public websites, business cards, public lists, stakeholders mapping	Legitimate interest – We believe that, as an EU association active in in the plastic industry, We have the legitimate interest to conduct our advocacy activities
Third party contractors and suppliers	Name, job title, email address, name of the organization, bank account details, phone number	Preparing, executing and terminating a contract We have with You	Contracts, invoices, quotes	Performance of a contract

Individuals invited to attend conferences, events and webinars	Name, job title, email address, organization You work in, your area of expertise	To invite you to our events that relate to your areas of interest	Business cards, email you send us, oral exchanges, public databases, events databases	Legitimate interest – We believe that, as an EU association active in the plastic industry We have the legitimate interest to conduct our advocacy activities. We rely on your consent and provide you with a specific privacy notice in order to run the registration process and for any following communication with you.
Recipients of our newsletter	Email address	To inform You about our activities, send You our newsletter, send You our reports, send You regulatory and policy updates	Subscription page on our website, written forms, emails	Consent / Legitimate interest
			Public website, oral exchanges during events We both attended, business cards	
Representatives and contact persons of the companies that register to the Operation Clean Sweep (“OCS”) program	Name, job title, email address, information on the organization You work in (e.g., name, status, websites, address)	To register your company to the OCS program, communicate with You about our activities under program, and offer our services to You	Subscription page on OCS website	Consent If Personal Data are provided by the organization You belong, we do so under the assumption that specific measures have been put in place by such organizations to lawfully provide us with your Personal Data

We also collect information about You or your device each time You visit our website or when We send You an email. This information may be considered to be Personal Data either in itself or when combined with other information about You. This includes technical information, including the Internet protocol (IP) address used to connect your device to the Internet and browser type and version, as well as information about your visit, including the dates and times You use our website, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), etc. or information on whether You open an email, dates and time You do that, etc.

We use cookies and other tracking technologies to do so. You can learn more about such technologies by reading the Cookies Notice available on each of our websites.

2. **Change of purpose**

We will only use your Personal Data for the purposes for which We collected it, unless We reasonably consider that We need to use it for another reason and that reason is compatible with the original purpose. If We need to use your Personal Data for an unrelated purpose, We will notify You and We will explain the legal basis which allows us to do so.

3. **Which third-parties process your Personal Data? Do We Share, Disclose or Transfer Personal Data?**

In order to conduct our activities, We may have to share or disclose your Personal Data with third parties, including third-party service providers.

We share your Personal Data with:

- a) IT experts who provide services to PlasticsEurope (e.g., data storage or website administration);
- b) Event-management and marketing platforms, as well as meeting venues only for our event organising purposes;
- c) Survey platforms;
- d) Service providers and cooperation partners We work with, for the purpose of co-organising events; and
- e) Other external parties We may cooperate with to run specific projects; (e.g. other industry associations and consultants).

We do not use other third-parties to process your Personal Data or otherwise transfer Personal Data outside of the EEA and/or disclose your Personal Data to other recipients than those identified in this Notice. If We were to do so, We will comply with EU Privacy Law.

4. **Data security**

Your Personal Data are treated as confidential.

We never pass on your contact details to third-parties for commercial purposes.

In order to safeguard your Personal Data from unauthorized access, collection use, disclosure copying, modification, disposal, or similar risks, We have put in place appropriate administrative, physical and technical measures. We update and test our security technology on an ongoing basis. We restrict access to your Personal Data to those employees and staff who need to know that information to provide benefits or services to You. In addition, We train our staff about the importance of confidentiality and maintaining the privacy and security of your information. We commit to taking appropriate disciplinary measures to enforce our staff' privacy responsibilities.

5. **How long will We retain your Personal Data?**

We store your Personal Data as long as You don't withdraw your consent or don't object to the Processing.

We undertake, absent of any Processing activities within a period of 24 months, to delete the Personal Data We hold on You. However, We may retain your Personal Data under EU or national laws. We may retain electronic copies of files containing Personal Data created pursuant to automatic archiving or back-up procedures which cannot reasonably be deleted. In these cases, We shall ensure that the Personal Data are not further actively processed.

6. **Your rights in connection with Personal Data**

Under certain circumstances, under EU Privacy Law, You have the right to:

- (a) **Request access** to your Personal Data. This enables You to receive a copy of the Personal Data We hold about You and to check that We are lawfully Processing it.
- (b) **Request correction** of the Personal Data that We hold about You. This enables You to have any incomplete or inaccurate information We hold about You corrected.
- (c) **Request erasure** of your Personal Data. This enables You to ask us to delete or remove Personal Data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your Personal Data where You have exercised your right to object to Processing (see below).
- (d) **Request the restriction of Processing** of your Personal Data. This enables You to ask us to suspend the Processing of Personal Data about You, for example if You want us to establish its accuracy or the reason for Processing it.
- (e) **Request the transfer** of your Personal Data to another party (right to data portability).

To exercise your rights as Data Subject, make queries or complaints, please contact privacy@plasticseurope.org.

When You provided your consent to the collection, Processing and transfer of your Personal Data for a specific purpose, You have the right to withdraw your consent for that specific Processing at any time.

When We process your Personal Data based on our legitimate interest (or those of a third party), You have the right to object to such Processing. To withdraw your consent or object to the Processing, please contact privacy@plasticseurope.org.

If You are dissatisfied with any aspect of our handling of your Personal Data, You have the right to make a complaint at any time to the relevant Supervisory Authority.

7. **Changes to Notice**

We may revise this privacy Notice from time to time and any revisions will be made available to You via our website.

8. **Our contact details**

PlasticsEurope AISBL
Rue Belliard 40, Box 16
1040 Brussels – Belgium
T: +32 (0)2 792 30 99
E: privacy@plasticseurope.org

9. **Glossary**

In this Notice:

"EU Privacy Law" means the General Data Protection Regulation 2016/679 ("**GDPR**") and the Belgian national privacy laws, as amended from time to time.

"Data Subject" means an identified or identifiable individual.

"Personal Data" means any information relating to an identified or identifiable natural person.

"Processing" means any operation performed on Personal Data, manually or by automated means, such as collection, recording, organization, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

"Supervisory Authority" means the Belgian Data Protection Authority or the relevant data protection authority of the data subjects' habitual residence or place of work.

Version No. 5
June 2021