

PLASTICS EUROPE AISBL

PRIVACY NOTICE FOR REPRESENTATIVES OF MEMBER COMPANIES AND MEMBERS OF THE STEERING BOARD

PlasticsEurope AISBL ("**We**", "us", "our"), is committed to complying with EU Privacy Law. This privacy notice (the "**Notice**") describes how We process the Personal Data (as defined below) We collect from designated representatives of our members and our Steering Board members ("**You**") and how We use cookies on the members' platform (extranet).

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 collect about You?**

The Personal Data We collect about You are:

- (a) First Name and Last Name;
- (b) Email address;
- (c) ID card and/or passport, when so required by laws;
- (d) Name of the organization You belong to;
- (e) Date of birth;
- (f) Function within the organization;
- (g) Your professional phone number;
- (h) If You are a representative of a Steering Board member's company, your home address; and
- (i) Your biography and picture.

2. **How do We collect and process (use) your Personal Data? And on which legal basis?**

We typically collect Personal Data directly from You or from the organization You belong (in such case under the assumption that specific measures have been put in place by such organizations to lawfully provide us with your Personal Data). We use your Personal Data for different purposes. These include:

- (a) Organizing and handling General Assemblies and Steering Board meetings (if You are a member);

- (b) Keeping records of the Steering Board meetings and the General Assemblies, and circulating minutes;
- (c) Publishing relevant resolutions such as the appointment, renewal or replacement of member representative of the Steering Board in the Belgian Official Journal.

We do so in order to comply with our legal obligations under Belgian laws. In that respect, We are sharing the necessary Personal Data with our counsel (who is bound by professional secrecy rules).

We also process your Personal Data in order to run the operations of the association and provide You with the associated benefits of your membership.

In particular, We process your Personal Data to:

- (a) Assess the suitability of applicants for membership and the suitability of members who wish to renew their membership;
- (b) Maintain membership records;
- (c) Confirm membership status with third parties, including with regulators or statutory bodies and to provide third parties with information as may be authorized or required by law;
- (d) Administer your organization's membership;
- (e) Send out membership renewals, surveys, voting papers and other information relevant to our functions and obligations;
- (f) Process membership fees' payments;
- (g) Establish and maintain communications with You;
- (h) Allow You to access and use our extranet;
- (i) Provide content or services You request from us;
- (j) Invite You to attend our work groups and product groups and run such groups;
- (k) Send You our publications, brochures, newsletters, reports and other materials;
- (l) Invite You to our event, seminars and webinars;
- (m) Manage complaints and conduct investigations and disciplinary or dispute resolution activities;

- (n) Share your details, biography and picture on our extranet in order to allow You and other members to communicate with each other.

We do so based on our legitimate interest (or, for cases referred under (b), (c), (f) and (m) above, in order to comply with legal obligations under Belgian laws). As a trade association, We have the interest in carrying out the activities necessary to perform the purpose ascribed in our articles of associations and governing rules and principles. In doing so, We considered your rights and expectations as a Data Subject and have assessed that your interest, fundamental rights and freedoms are not put at risks. When We collect and process your Personal Data based on legitimate interest, You have specific rights (see s.7 below for more information in that regard).

We also collect information about You or your device each time You use the Extranet. This information may be considered to be Personal Data either in itself or when combined with other information about You. This includes the IP address used to connect your device to the Internet as well as information about your visit. Please refer to s.8 below to know more on our use of cookies.

3. 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 (as well as your rights in relation to such further processing).

4. 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 Plastics Europe (e.g., data storage or website administration);
- (b) Where necessary and appropriate with legal counsels (who are bound by professional secrecy rules) or financial institutions;
- (c) Event-management and communications agencies as well as meeting venues only for our event organizing purposes;
- (d) Marketing and survey platforms;
- (d) Service providers and cooperation partners We work with, for the purpose of co-organizing 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 mentioned in this Notice. When your Personal Data are processed outside the EEA, We take steps to ensure that the transfer of your Personal Data complies with EU Privacy Law.

5. **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.

6. **How long will You retain my Personal Data?**

We retain your Personal Data in accordance with our Retention/Destruction Procedures and Policy. As a general principle, We keep your Personal Data only as long as it is necessary.

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

Under certain circumstances, by 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 information 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) **Object to processing** of your Personal Data where We are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes You want to object to the processing on this ground.

- (e) **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.
- (f) **Request the transfer** of your Personal Data to another party (data portability).

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 Supervisory Authority.

8. **Use of Cookies on the members platform**

When You access the extranet, We place small text files called cookies on your device.

We also collect information about You or your device each time You visit our Extranet 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 Extranet, 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 our Extranet Cookies Notice.

9. **How can You contact us?**

For more information, or if You have questions about your Personal Data, or on the way We collect and process Personal Data, on how We use cookies on the Extranet, or want to exercise any of your rights under this Notice, You can e-mail us at: privacy@plasticseurope.org.

10. **Effect of Notice and changes to Notice**

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

11. **Our contact details**

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

12. **Glossary**

In this Notice:

"Data Subject" means an identified or identifiable individual.

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

"Personal Data" means for the purpose of this Notice, your first name, last name and email address, professional phone number, date of birth, national number and/or ID and passport number and, if You are a member of the Steering Board, this also includes your home address.

"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.