### **Privacy Policy**

The non-profit organisation "Ecole d'Escalade de la Woluwe" (hereafter referred to as "the NPO") endeavours everything to protect your private life and guards that you can trust us with your personal information in total security.

The NPO manages your personal information at a certain and a tactful manner. The NPO undertakes all reasonable security measures (as well on technical as on organisational level) in order to avoid a loss, modification, non-authorized access, distribution to a third party and/or every other illegal treatment of your personal information.

We use your personal information always on a loyal manner in order to prove to ourselves that we are worthy of your trust.

We collect your personal information according to the applicable Belgian and European legislation, including the REGULATION (EU) 2016/679 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation or abbreviated "GDPR").

For the purposes of this Privacy Policy the term "personal data" or "personal information" is defined as follows:

'personal data' means any information relating to an identified or identifiable natural person ('data subject'); 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 identity of that natural person (art 4, 1) GDPR);

### 1. Scope of the Privacy Policy

By means of this Privacy Policy the NPO aims to provide you with a clear and transparent explication about the personal data which are collected, about the purpose and the use of it and which persons you can contact with questions about this subject.

The NPO can always change or update this Privacy Policy taking into account the comments of the persons involved or in order to present modifications in the manner of collecting the personal data.

### 2. Collection of personal data

2.1 When does your personal data is collected?

We collect your personal data when (non-exhaustively):

- you contact us through our different channels at your service;
- you share personal data, for example when:
- 1. you subscribe via the form online or on paper;
- 2. you make a reservation for a course or an internship for yourself of for your child via the form online or on paper;

### 3. you subscribes for a course online or on paper

When we ask your personal data, you have the right to refuse. In this case, we respect your choice. However, we cannot offer you our services and you cannot be member of our organization without knowing certain personal data.

### 2.2 Which data is collected?

The NPO collects the following data:

- Personal data: name, first name, address, email address, phone number;
- Other necessary personal information for the subscription to a course and/or internship: health conditions of the participant (i.e. if the participant has a certain condition and needs special intervention in case of an emergency)

#### 3. Why does the NPO collects these data?

The NPO collects and uses your personal data exclusively for the following specific and legal purposes:

Type personal data – Purpose – Judicial ground

#### Type:

- name, first name, address, email address, phone number;
- Health conditions
- Pictures

### Purpose:

- To manage the subscriptions to the courses/internships/trainings
- To answer to legal, official and administrative obligations
- To provide information about the courses/interships/trainings
- To guard the safety of the participants

### **Judicial ground:**

- Necessary for the execution of the contract
- Legal obligation
- Legitimate interests
- Consent

## 4. Sharing personal data to third parties

#### 4.1 Partners

The NPO can share your personal data with third parties (federation, other clubs, etc) if this is necessary in order to, amongst other, manage transactions or offer you services which you have requested (for example to subscribe you to a competition)

In this case your personal will be shared exclusively with the purpose to offer you these services according to this privacy policy.

#### 4.2 Legal obligations

The NPO can share your personal data if the law requires it or if the NPO considers this necessarily in order to handle according to legal procedures or to answer to potential complaints.

### 5. Yours rights regarding your personal data

You dispose of certain rights so that you have control about your own personal data which you shared. U find more information below.

### 5.1 Right to unsubscribe from advertisements

Every person has the right to unsubscribe from advertisements, information, proposals, offers for products or services from the NPO.

## 5.2 Right to access, modify, restrict of processing and object (art 15, 16, 18, 19, 21, 22 GDPR)

You always have access to your personal data. If the NPO cannot provide you access to your personal data (for example for a legal reason), it explains her decision.

You have moreover the right to ask the NPO to rectify inaccurate or incomplete personal data.

You have the right to obtain from the NPO restriction of processing of your personal data.

You have the right to object at any time to processing of personal data automatically.

### 5.3. Right to be forgotten (art. 17 GDPR)

In certain circumstances, you have the right to obtain from the NPO the erasure of personal data;

In this case you have however to take into account that you will not longer be able to have the advantage of our services.

Your right to be forgotten is not absolute. We have the right to keep your personal data if that is strictly necessary, for example in the following situations:

- For compliance with a legal obligation
- For the establishment, exercise or defence of legal claims.

# 5.4. Right to withdraw your consent (art. 7 GDPR)

Your personal will be collected after you have given explicitly permission to do so.

Thus, you have the right to withdraw your consent at any time.

This withdrawal can be made upon simple request addressed to the NPO.

### 5.5 Right to data portability (art. 20 GDPR)

You will have, in certain conditions, the right to transmit your personal data to another data controller.

You shall have the right to have the personal data transmitted directly from one controller to another, where technically feasible.

## 5.6. Execution of your rights

You can execute these right ordinarily and freely by sending us an email to the following address:

### info@stone-age.be

In order to be able to verify your identity, we request that you send us a copy of the frontside of your identity card.

## 6. Security and storage of your personal data

#### 6.1 Security

The NPO shall implement appropriate technical and organisational measures to ensure a level of security in order to avoid a breach of access, use or distribution of your personal data.

The NPO guards your personal data exclusively in a secure and controlled environment which is not accessible to the public, except for the persons who are authorized access to execute their tasks.

The servers on which the personal data is stored will be situated in a controlled environment with limited access.

# 6.2 Storage

The NPO shall not safeguards your personal data for no longer than necessary for the purposes for which the personal data are processed.

The actual duration of the storage is determined in function of the purposes of their management, taking into account the periods which are prescribed and the obligations for safeguard established in specific legislations (for example accounting/social legislation).

### 7. Contact of complaints

The NPO acts as responsible controller of personal data which it collects.

In case you have questions or comments about this Privacy Policy or the management of your personal data, you can take contact with us per mail: <a href="mailto:info@stone-age.be">info@stone-age.be</a>.

You find more information about the Belgian Data Protection Authority on the following website (https://www.gegevensbeschermingsautoriteit.be/).

Every complaint can be filed with the Belgian Data Protection Authority (art. 77 RGDP) (<a href="https://www.gegevensbeschermingsautoriteit.be/">https://www.gegevensbeschermingsautoriteit.be/</a>).