

**The Association for the Advancement of Assistive Technology in Europe**

# **Personal data protection policy and procedures**

**Following the entry in force of EU General Data Protection Regulation 2016/679**

***V. 1 of 31/05/2018***

## **Transparency matters!**

### **Table of contents**

1 - Introduction	2
2 - General clauses	2
3 - Systematic collection of personal data by AAATE	3
3.A The database of members	3
3.B The database of participants in events organised under the control of AAATE	5
3.C The database of strategic stakeholders	6
3.D The database of suppliers of goods and services	7
3.E The database of ENTELIS network members	8
4 - Information collected automatically while visiting our website	9
5 - Your rights	10
6 - Retention of your data	10

## 1 - Introduction

The following information is relevant for all those that are in contact with AAATE. It explains how personal data are treated and in case we treat your data, what your rights as data subjects are.

This document also covers the personal data that AAATE processes in its function as webmaster and mailing list administrator of the ENTELIS network.

The personal data are processed in accordance with the EU General Data Protection Regulation 2016/679. Terminology is as much as possible taken from the Regulation (Article 4 - Definitions).

AAATE is a not-for-profit Association of institutions and natural persons with interest in the advancement of Assistive Technology worldwide. It is based in Linz in Austria and is subject to Austrian and European law. For the law AAATE is considered the controller and processor of personal data. According to the criteria established by the Regulation AAATE has no obligation to appoint a data protection officer. Therefore the responsible person for the correct implementation of the Regulation is the President of AAATE who has delegated this function to the Secretary General.

## 2 - General clauses

AAATE is an active and connected organisation and as such it interacts with natural persons or natural persons representing organisations. During these interactions (e.g. receiving and responding to enquiries, requests for documents, welcoming visitors on our website, etc.) the secretariat acting under the authority of AAATE and the board members of AAATE come in contact with personal data, e.g. data that refer to identifiable natural persons (the so called “data subjects”). Most of the time these data will be provided to AAATE by the person on a voluntary basis. The data can come into the possession of AAATE online or offline.

As a rule these data will be considered part of “personal and household” activities, and they will not be further processed (collected, recorded, organised, stored, filed, etc.), with some exceptions outlined in section 3 and which relate to the legitimate purpose of the association’s existence and its legitimate interest: to advance the field of assistive technology in its widest sense for the benefits of people with disabilities and the elderly.

In all cases AAATE will not sell, rent, trade or lease any personal information collected online or offline. All information shall be kept absolutely confidential unless consent is obtained from the data subject authorising a different use of his or her personal data. In other words, AAATE will not share your personal information with others, unless it has obtained your consent to do so.

AAATE in processing personal information uses secure data networks that are protected by firewalls and password protection systems that are consistent with industry standards. In implementing its activities AAATE might use cloud based collaboration tools and services provided by major international companies, such as Google. Only services of providers that declare compliance with the EU General Data Protection Regulation 2016/679 will be used.

In case of voluntary subscriptions by the natural person to online communities initiated or endorsed by AAATE, such as LinkedIn, Twitter or other so called social media, the responsibility of your data treatment remains with the service provider and AAATE declines any responsibility of the use that may be made of your data by them.

AAATE does not collect nor process any genetic, biometric or health related data, with the exception of some information related to disability and or dietary requirements that might occasionally be collected for the scope of facilitating the organisation of events.

In case AAATE will start to collect other health related data in the framework of research activities, those data will be treated in compliance with the Regulation and our policy will be updated and re-approved by the board.

The security and privacy policies of AAATE are periodically reviewed and enhanced as necessary.

### **3 - Systematic collection of personal data by AAATE**

As a practice personal data will not be further processed (collected, recorded, organised, stored, etc.), with the exception of four types of stakeholders whose personal data, once identified, are processed and recorded in the following filing systems.

- A. The database of members
- B. The database of participants in events organised under the control of AAATE
- C. The database of strategic stakeholders
- D. The database of suppliers of goods and services
- E. The database of ENTELIS network members

AAATE is responsible for the protection of all personal data in its possession and below more information is provided regarding the collection and treatment of those data.

#### **3.A The database of members**

*Purpose of data collection:* To allow the association to exist, to allow members to exercise their right to control the association and to vote during the general assemblies, to facilitate the communication with and among members and to put them in the condition to enjoy the benefits from being a member. This includes receiving periodically updates via e-mail.

*Basis for collection and processing:* A deliberate and voluntary act of natural persons that provide AAATE with personal data for the scope of making them identifiable in exercising their rights. Data will only be stored upon receiving written consent.

*Data collected:* Name and surname, Affiliated organisation/institution, Postal address (work or private as consented), E-mail, Phone number, Billing & Payment information, Role(s) in AAATE, willingness to receive news updates or not, or a subset of these data.

*Storage of data:* Data are stored in digital format on a webserver managed by OVH, a company that declares compliance with the European Data protection regulations<sup>1</sup>. Data will be erased from the digital database at the latest within two years after the end of membership, with the exception of those of data subjects that are of interest for the history of AAATE (past board members, awarded members, etc.), as well as data regarding financial transactions that we are required by law to keep for at least 7 years.

*Access to your data:* As a practice your personal data will be accessible to AAATE secretariat and board members and, upon your explicit consent and according to the following table, disclosed also to other recipients via the website or in other forms.

*Table 1. Database of members: Disclosure of categories of personal data to specific recipients*

<b>Who has access to your data</b>	<b>AAATE secretariat &amp; board members</b>	<b>All members</b>	<b>General public</b>	<b>The following service providers: -IOS Press for access to the journal. -Organisations that have an agreement with AAATE for the extension of membership benefits</b>
<b>Type of data</b>				
<b>Name and Surname</b>	Yes	Yes	Yes	Yes
<b>Organisation/ Institution</b>	Yes	Yes	Yes	Yes
<b>Postal Address (as provided)</b>	Yes	No	No	No
<b>Country</b>	Yes	Yes	Yes	Yes
<b>E-mail</b>	Yes	Yes (in the protected part of the website)	No	Yes
<b>Phone and fax number (if provided)</b>	Yes	Yes (in the protected part of the website)	No	No
<b>Billing information</b>	Yes	No	No	No
<b>Role in AAATE (eg. member, board positions, national contact persons)</b>	Yes	Yes	Yes	Yes

<sup>1</sup> <https://www.ovh.com/fr/protection-donnees-personnelles/>  
Copyright AAATE 2018. (Version 31/05/2018)

*Rights of data subjects:* Members have full ownership of their own data. At any time a member, by creating an account, can view the whole set of his or her data in possession of AAATE and add, delete or change part or all of his or her data in possession of AAATE in the database of members, or ask AAATE to do so.

*Sharing of data:* Some data might be made available to providers of services included in the membership benefits, such as IOS Press but only those that are relevant for the delivery of the service.

### **3.B The database of participants in events organised under the control of AAATE**

*Purpose of data collection:* To have a database of participants in events organised under the control of AAATE (conferences, workshops, seminars, etc.) that can be informed about the event they have signed up for and about future professional or strategic non-commercial activities of AAATE.

*Basis for collection and processing:* A deliberate and voluntary act of natural persons that consent AAATE to process their personal data for the scope of the organisation of the event. Data will only be processed and stored upon the reception of written consent. The possibility of further use of personal data for professional non-commercial reasons, including receiving news from AAATE, will be subject to a separate consent.

*Data collected:* Title, Name and surname, Affiliation: organisation/institution, Postal address as provided, E-mail, Phone and fax number, Social media account(s), Area of activity, Area of interest, billing information, or a subset of these data. For the sole scope of facilitating the organisation of the event, also data regarding disability and dietary requirements may be collected.

*Storage of data:* Depending on the event data are collected and stored either on the server of the University of Linz, who on the basis of an agreement between AAATE and the University of Linz for the use of its Conference Management Tool might act as data processor, on the server hosting the AAATE website, or on cloud based commercial platforms (e.g. Google Drive) that declare compliance with the Regulation.

*Access to your data:* Your personal data will only be accessible to AAATE secretariat, board members and, under specific conditions might be disclosed to external programme committee members, event organisers (eg written agreement limiting the use of data for non-commercial reasons and for the scope of the event only), and other participants to the same event upon explicit consent.

*Table 2. Database of participants in AAATE events: Disclosure of categories of personal data to specific recipients*

<b>Who has access to your data</b> <b>Type of data</b>	<b>AAATE secretariat &amp; board members</b>	<b>External programme committee members</b>	<b>Event organisers</b>	<b>Other participants</b>
<b>Name and Surname</b>	Yes	Yes	Yes	Yes
<b>Organisation/Institution</b>	Yes	Yes	Yes	Yes

<b>Work Address</b>	Yes	Yes	Yes	Yes
<b>Country</b>	Yes	Yes	Yes	Yes
<b>E-mail</b>	Yes	Yes	Yes	Yes
<b>Phone and fax number</b>	Yes	Yes	Yes	No
<b>Social media account</b>	Yes	Yes	Yes	No
<b>Billing information</b>	Yes	No	No	No
<b>Special needs related to disability</b>	Yes	No	Yes	No
<b>Dietary requirements</b>	Yes	No	Yes	No
<b>Area of activity</b>	Yes	Yes	Yes	Yes
<b>Area of interest</b>	Yes	Yes	No	No

*Rights of data subject:* At any time a data subject can view the entire set of data about them in possession of AAATE and ask AAATE to delete, change or complete part or all data in possession of AAATE.

*Sharing of data:* Data will never be shared with third parties, with the exception of event organisers with whom AAATE has a written agreement which includes a data protection clause and with other participants as appropriate and on the basis of explicit consent.

### **3.C The database of strategic stakeholders**

*Purpose of data collection:* To have a database of strategic stakeholders that can be informed about the activities of AAATE and contacted for purely professional or strategic non-commercial reasons.

*Basis for collection:* a deliberate and voluntary act of natural persons that consent AAATE to process their personal data for the scope of collaboration with AAATE and being informed by e-mail about activities involving AAATE. Data will only be stored and used upon the reception of written consent. In case no consent is obtained organisations might be contacted through their general impersonal company contact details.

*Data collected:* Title, Name and surname, Affiliation: organisation/institution, Work address, E-mail, Phone and fax number, Social media account(s), Area of activity, Area of interest.

*Storage of data:* Data are stored in digital format on a cloud based commercial platform (Google Drive).

*Access to your data:* Your personal data will only be accessible to AAATE secretariat and board members.

Table 3. Database of strategic stakeholders: Disclosure of categories of personal data to specific recipients

<b>Type of data</b>	<b>Who has access to your data</b>	<b>AAATE secretariat &amp; board members</b>
<b>Name and Surname</b>		Yes
<b>Organisation/Institution</b>		Yes
<b>Work Address</b>		Yes
<b>Country</b>		Yes
<b>E-mail</b>		Yes
<b>Phone and fax number</b>		Yes
<b>Social media account</b>		Yes
<b>Area of activity</b>		Yes
<b>Area of interest</b>		Yes

*Rights of data subject:* At any time a data subject can view the entire set of data about them in possession of AAATE and ask AAATE to delete, change or complete part or all data in possession of AAATE.

*Sharing of data:* Data will never be shared, except with explicit written consent.

### 3.D The database of suppliers of goods and services

*Purpose of data collection:* To facilitate access to and communication with suppliers of goods and services.

*Basis for collection:* a deliberate and voluntary act of natural persons that consent AAATE to process their personal data for the scope of providing goods and services to AAATE. Data will only be stored upon the reception of written consent. In case no consent is obtained organisations will only be contacted through their general impersonal company contact details.

*Data collected:* Title, Name and surname, Affiliation: organisation/institution, Work address, E-mail, Phone and fax number, Business area, Information regarding financial transactions.

*Storage of data:* Data are processed in digital format on a password protected personal computer of the AAATE secretariat and stored on a server of JKU Linz. Invoices are also collected and stored on paper. They are kept in a lockable filing cabinet in a lockable room (JKU Linz, HF 103, Altenberger Str. 69, 4040 Linz) where unauthorised people cannot see it. Data printouts are shredded and disposed of securely when no longer required. They are deleted on request but at the earliest 7 years after the closed fiscal year.

*Access to your data:* Your personal data will only be accessible to AAATE secretariat and on demand the fiscal authority.

*Table 4. Database of suppliers: Disclosure of categories of personal data to specific recipients*

<b>Type of data</b>	<b>Who has access to your data</b>	<b>AAATE secretariat members and board members</b>
<b>Name and Surname</b>		Yes
<b>Organisation/Institution</b>		Yes
<b>Work Address</b>		Yes
<b>Country</b>		Yes
<b>E-mail</b>		Yes
<b>Phone and fax number</b>		Yes
<b>Business area</b>		Yes
<b>Information regarding financial transactions</b>		Yes

*Rights of data subject:* At any time a data subject can view the entire set of data about them in possession of AAATE and ask AAATE to delete, change or complete part or all data in possession of AAATE.

*Sharing of data:* Data will never be shared.

### **3.E The database of ENTELIS network members**

*Purpose of data collection:* To have a database of ENTELIS network members in order to act as a network and to reach its objectives.

*Basis for collection:* a deliberate and voluntary act of natural persons that consent AAATE to process their personal data for the scope of collaboration with other ENTELIS network members. Data will only be stored upon the reception of written consent.

*Data collected:* Title, Name and surname, Affiliation: organisation/institution, Work address, E-mail, Phone and fax number, Relevant memberships, Social media account(s), Area of activity, Area of interest.

*Storage of data:* Data are stored in digital format on a cloud based commercial platform (Dropbox).

*Access to your data:* Your personal data are published on a public website: [www.entelis.net](http://www.entelis.net).

Table 5. Database of ENTELIS network members: Disclosure of categories of personal data to specific recipients

<b>Type of data</b>	<b>Who has access to your data</b>	<b>General public</b>
<b>Name and Surname</b>		Yes
<b>Organisation/Institution</b>		Yes
<b>Work Address</b>		Yes
<b>Country</b>		Yes
<b>E-mail</b>		Yes
<b>Phone and fax number</b>		Yes
<b>Social media account</b>		Yes
<b>Relevant memberships (self-declared)</b>		Yes
<b>Area of activity</b>		Yes
<b>Area of interest</b>		Yes

*Rights of data subject:* At any time a data subject can view the entire set of data about them in possession of AAATE and ask AAATE to delete, change or complete part or all data in possession of AAATE.

*Sharing of data:* Data are public and accessible via the website.

#### 4 - Information collected automatically while visiting our website

In case you use one of our websites [www.aaate.net](http://www.aaate.net) or [www.entelis.net](http://www.entelis.net), the system may automatically register information about you:

This will typically be:

- technical information, including IP address, login information, browser type & version
- information about your visit
- cookies and other technologies

Information collected on our site may be stored and processed into anonymous statistics or log files for internal use, such as traffic and profile analysis. This information is solely used to gain a more informed understanding of how our website is being used and to make our website more relevant to our users.

## 5 - Your rights

In accordance with the General Data Protection Regulation, you have the right to request information about our use of your information or opt out of certain uses. When AAATE asks for your consent to process your personal data, you can at any time decide to withdraw that consent.

You may exercise your rights at any time by contacting us by sending an email to [info@aaate.net](mailto:info@aaate.net). It will be our concern to respond to you without delay and in any case within a month.

Your rights as a data subject will include:

- requesting a copy of the personal data held by AAATE about you, the purpose of the processing and information regarding the recipients of the personal information.
- requesting rectification or updating of incorrect data and erasure of your personal data.
- object to the processing of your personal data or the right to transmit those data.
- the right to lodge a complaint with the supervisory authority.

Data subjects that are member of AAATE have the right to directly access their personal data in the members database, to view all their data in that database and to update some categories of data under their own responsibility to provide accurate information.

## 6 - Retention of your data

Your personal data are kept in our data bases only for as long as is necessary for the purposes for which they were collected.

We will retain and use your personal data for as long as reasonably necessary to provide our services to you, and to comply with our legal obligations, resolve disputes, and enforce our agreements.

Our established practice is that data that are not longer relevant for the purpose they were collected for will be erased from our records within two years time.

For more information: [info@aaate.net](mailto:info@aaate.net)

Approved by the AAATE board: 29/05/2018