



European Tugowners Association

Privacy is very important to us. We invite you to read the following information carefully to learn how we treat and protect the personal data we collect from you.

The Data Controller of the GDPR is the European Tugowners Association (ETA), with registered offices at Rue de Colonies, 11, 1000 Brussels.

DATA COLLECTED

ETA will process the following data in either electronic or paper format:

- Personal data such as your name and email address when contacting us through any written means of communication.
- Personal data such as your name, surname, email address, occupation/job title, age/date of birth, gender, qualifications, nationality, address, phone number(s) and organisation, as well as photographic and video material (with your consent) during events hosted by ETA. This data may be shared on social networks or through organizational communication and may be denied/revoked at any time at written request.
- Aggregated data related to your visit to our website. This information can not be used to identify you but is used in combination with other visit information to improve our services.
- Like all standard websites and online databases, we may store and collect information in the form of cookies (a small amount of data sent through your browser). This information offers functionality such as improving website load times and retaining information for auto-filling forms.
- Our web server collects and stores technical information about you and your web browser within a log file.

This information may contain your IP address, browser software and version, Internet Service Provider (ISP), referring/exit pages, date/time stamp and web page clicks.

- We may use third-party software to provide some services. In such cases, please refer to the privacy policy of that specific service, as privacy policies may vary between organizations.

LAWFULNESS OF PROCESSING

The data you provide will be used for the management of ETA activities and to update you on ETA initiatives.

Specifically, your data is processed for the following purposes and legal bases:

a) With your consent for services and, in particular, for:

- event communications.
- membership management
- helping us improve technical assistance, customer care, our services and content;
- performing any aggregate statistical analysis on an anonymous basis.

b) The Data Controller will use your data to protect its legitimate interests to:

- manage complaints and disputes, recover debts, prevent fraud and illegal activities
- exercise the rights and protect the legitimate interests of the Data Controller or third parties, for example, the right of defence in court;
- send communications to the email address you provided. Each email sent will allow you to refuse further submissions by clicking on the appropriate link.

c) For the fulfilment of legal obligations, your data will be used to comply with and fulfil the obligations provided by laws, regulations, community regulations, orders, and prescriptions of the competent authorities.

DATA PROCESSING

Your personal data will be processed for collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

Your personal data is subject to paper, electronic, and automated processing and is stored in databases.

MANDATORY OR OPTIONAL NATURE OF DATA PROVISION AND CONSEQUENCES OF ANY REFUSAL

Among the information we collect, some are essential to the stipulation and administration of your contract, and others help us offer you better service daily. In particular:

- The provision of your personal data, processed for service, is mandatory as it is necessary to enrol in training courses and register on the site;
- The provision of your personal data, processed for other purposes, is optional.

PERSONAL DATA RETENTION PERIOD

The Data Collector keeps and uses your personal data for no more than ten years from the end of the relationship for the purposes of the service and, in any case, for the prescription time required by law. Subsequently, your data will be deleted or made anonymous and processed for aggregate and anonymous statistical analysis.

DATA ACCESSIBILITY

Your data will be shared only if strictly necessary. Your data is, in fact, accessible to:

- employees of ETA who contribute to creating, managing, maintaining and improving all the services offered;
- service external providers that carry out outsourcing activities on

behalf of the data controller – in their capacity as external processors – carrying out related, instrumental or support activities to those of ETA, for example, technical management and maintenance of the contents of the website, management of Information Technology systems, tax services, credit recovery, data processing services for billing and filing of documentation relating to customer relations, etc.

DATA COMMUNICATION

The Data Controller can communicate your data without your express consent for the purposes of services:

- to the judicial and / or control authorities at their request;
- to all other subjects to whom it is necessary to communicate them, by law or by contract, to allow the performance of the purposes described above (such as, for example, credit institutions professional offices).

These subjects will retain your data in their capacity as data processors. In any case, we want to assure you that your Data will not be disclosed.

DATA TRANSFER

There is no transfer of data outside the European Union. If, in the future, for reasons exclusively connected to the provision of the service (eg location of cloud servers in non-European countries by the appointed providers, sale of services located in countries outside Europe, etc.), your data should be subject to these transfers, ETA will take appropriate safeguards, including adequacy decisions and standard contractual clauses approved by the European Commission.

RIGHTS OF DATA SUBJECTS

You may exercise your rights by emailing info@eurotugowners.com; in particular, you may request access to personal data concerning you, its correction or cancellation, or you may request a limitation of processing and may object to processing. You will also have the right to data

portability, and, if you wish to make a complaint, you can submit it to the Personal Data Protection Authority.

DATA CONTROLLER

ETA with registered offices at Rue du Metal 11, 1000, Brussels, in the person of the Legal Representative, Anna Maria Darmanin, is the data controller of your data.

For communications or requests, the Company is reachable on:

info@eurotugowners.com.

The updated list of our data processors is available at the offices of the data controller and available on the website:

www.eurotugowners.com

SECURITY MEASURES

Every time you use our services, the data controller and third parties that work for us adopt appropriate and adequate security measures to prevent unauthorized access, unauthorized disclosure, modification or destruction of your data, pursuant to the provisions of the law applicable national law and the GDPR.

PRIVACY POLICY UPDATES

At ETA's sole discretion, this private policy may be changed from time to time without notification. Policy changes take effect when the updated policy is posted to the website.