

European Union Network for the Implementation and Enforcement of Environmental Law

## **Privacy Policy**

Your privacy is important to us, and so is being transparent about how we collect, use, and share information about you. This policy is intended to help you understand:

- 1. What information we collect about you
- 2. Why and with what authority we collect information
- 3. How we share information we collect
- 4. How we store and secure information we collect
- 5. How to access and control your information
- 6. How to contact us

This privacy policy covers the information we collect about you when you become a member of IMPEL, take part in our projects, or otherwise interact with us (for example, by attending our events or by receiving our newsletter).

IMPEL is a non-profit organisation with a legal seat in Brussels, Belgium. Its members are governmental organisations and consequently its staff member. One of the main aims of IMPEL is to facilitate collaboration and communication between its member organisations and members in order to exchange information and experiences.

This policy also explains your choices about how we use information about you. Your choices include how you can object to certain uses of information about you and how you can access and update certain information about you. **If you do not agree with this policy, do not access or use our services or interact with any other aspect of our network.** 

1.We collect the following information about you when you provide it to us (for example when you register for a meeting or when you take part in a project):

- Full name
- Email address
- Phone number(s)
- Job title
- Gender
- Details of the organisation you work for



In some cases, additional information is requested:

- Bank account number in case of reimbursement claims
- ID or Passport details and date of birth in case of travel requests
- Profile pictures on your Basecamp profile (not obligatory)
- Invoicing details from our member organisations
- Signatures on participants list (accounting requirement)

This website uses Google Analytics to analyse how users use the site. These tools use 'cookies', which are text files placed on your computer, to collect standard internet log information and visitor behavior information in an anonymous form. We did not approve that the information generated by the cookie about your use of the website (including your IP address) is transmitted to other Google services or vendors. We will never (and will not allow any third party) use the statistical analytics tool to track or to collect any personally identifiable information of visitors to our site. Your IP address can be collected when completing a SurveyMonkey questionnaire. An IP address can only be linked to a computer and not to a user. This is not a default feature. You have the ability to accept or decline cookies by modifying the settings on your browser.

2. Below are the specific purposes for which we use the information we collect about you:

- To inform you about our work and activities and relevant developments that could have an impact on your work
- To facilitate the exchange and sharing of information between our members and partner organisations
- To take care of logistics for our meetings and events (e.g. flights and hotel bookings\*)
- To send you IMPEL newsletters
- To facilitate communication within a project area on Basecamp
- For payment purposes

\*By registering to an IMPEL meeting you agree that personal data are provided to third parties or countries outside of the EEA for events security purposes and travel and accommodation bookings. Services outside of the EEA provide safeguards for data protection via the Privacy Shield in the United States.



The reason why we collect information is consent for weekly IMPEL newsletters and legitimate interest for any information collected for participation in IMPEL activities. Your information will be retained whilst participating in projects and for up to 7 years afterwards depending on the type of information collected. More information can be found in IMPEL Data Retention and Review Policy, which is shared with members on Basecamp.

3. How we share information we collect

First of all, IMPEL is a network – meaning we consider facilitating communications between our members as our core business. We make use of collaboration tools, and we want them to work well for you. We will only share information we collect about you in the ways discussed below.

 Sharing contact details with our members and organisation for collaboration purposes

For collaboration purposes, your basic contact details are shared with other members within the IMPEL network; for example for taking part in a project, to attend an event or to complete a questionnaire.

Images

During IMPEL events and project, photos are taken. These photos can be used for the IMPEL website or e-Newsletter or for reporting purposes. If you do not agree to this, please let us know.

- Sharing with affiliated partner organisations IMPEL has signed MoU's with partner networks, like ENPE and Enviroimment. Only your contact data might be shared with them in case of joint activities under the umbrella of these collaboration agreement or to share news and developments by these networks.
- Third parties
  We work with third-party service providers to provide website and application development, hosting, maintenance, backup, storage, virtual infrastructure, payment processing, analysis and other services for us, which may require them to access or use information about you. If a service provider needs to access information about you to perform services on our behalf, they do so under close instruction from us, including policies and procedures designed to protect your information.

Third party accounts:

Basecamp



TravelPerk

Use of third party service providers:

- Dropbox
- SurveyMonkey
- Mailchimp
- Azavista
- Google forms

All these third party providers have their own private policy statements published.

*Links to Third Party Sites:* Some information may include links that direct you to other websites or services whose privacy practices may differ from ours. If you submit information to any of those third party sites, your information is governed by their privacy policies, not this one. We encourage you to carefully read the privacy policy of any website you visit.

*Social Media Widgets:* Some information may include links that direct you to other websites or services whose privacy practices may differ from ours. Your use of and any information you submit to any of those third-party sites is governed by their privacy policies, not this one.

*Third-Party Widgets:* Some of our services contain widgets and social media features, such as the Twitter "tweet" button or the Facebook share button. Your interactions with these features are governed by the privacy policy of the company providing it.

4. How we store and secure information we collect

- Cloud storage
  IMPEL uses the following services for cloud storage: Dropbox, Google drive and Basecamp.
  - IMPEL uses a SSL certificate for encryption purposes.
- How long we keep information How long we keep information we collect about you depends on the type of information, as described in further detail below. After such time, we will either



delete your information or, if this is not possible (for example, because the information has been stored in backup archives), then we will securely store your information and isolate it from any further use until deletion is possible.

 Information you share If your account is deactivated or disabled, some of your information and the content you have provided will remain in order to allow your team members or other users to make full use of the Services. For example, we continue to display messages you sent via Basecamp.

5. How to access and control your information

You have certain choices available to you when it comes to your information. Below is a summary of those choices, how to exercise them and any limitations:

- You have the right to request a copy of your information, to object to our use of your information, to request the deletion or restriction of your information, or to request your information in a structured, electronic format. Below, we describe the tools and processes for making these requests. For all other requests, you may contact us as provided in the Contact Us section below to request assistance.
- You can ask us to delete your contact details and other information from our contact database. Please note, however, that we may need to retain certain information for record keeping purposes, to complete transactions or to comply with our legal obligations or EU grant regulations.
- If you no longer wish to use your accounts on Basecamp or TravelPerk, you can deactivate your own account, if that setting is available to you in your account settings. Otherwise, please contact the IMPEL secretariat and they will do it for you.
- You may opt out of receiving our IMPEL e-newsletter from us by using the unsubscribe link within each email, updating your email preferences.
- The services are not directed to individuals under 16. We do not knowingly collect personal information from children under 16. If we become aware that a child under 16 has provided us with personal information, we will take steps to delete such information.
- We may change this privacy policy from time to time. We will post any privacy policy changes on this page. We will also keep prior versions of this Privacy Policy in an archive for your review. We encourage you to review our privacy policy, regularly and whenever you use the services to stay informed about our information practices and the ways you can help protect your privacy. If you disagree with any changes to this privacy policy, you will need to stop using the services and deactivate your account(s) and data, as outlined above.



6. How to contact us

You may exercise your rights to access, rectification, erasure, portability, restriction and/or objection to the processing at the specified post and email addresses. If you have questions or concerns about how your information is handled, please direct your inquiry to:

Contact	person:	Will	Fawcett	(IMPEL	Secretariat	Coordinator)	
Email: <u>info@impel.eu</u>							
Address: Chemin		des	deux	maisons	73,	box	3
1200,							Brussels
Belgium							