PRIVACY STATEMENT

I. GENERAL

EUROPEAN ENERGY INFORMATION SHARING AND ANALYSIS CENTRE (abbreviated to EE-ISAC) VZW, with its registered office in Belgium, 1000 Brussels, Avenue Marnix 30, PO Box 14, registered in the Belgian Crossroads Bank for Enterprises under company number 0643.937.072, RLE Brussels, attaches great importance to the protection of personal data. In this privacy statement, EE-ISAC aims to provide clear and transparent information about what personal data it collects and how it handles this personal data.

EE-ISAC qualifies as a data controller with regard to the processing of personal data. EE-ISAC therefore undertakes to process the personal data obtained in accordance with the provisions of 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 (hereinafter: 'General Data Protection Regulation' or, in abbreviated form: 'GDPR') and the Belgian Act of 30 July 2018 on the protection of natural persons with regard to the processing of personal data.

As EE-ISAC processes personal data, the person whose personal data is processed qualifies as a "data subject" within the meaning of Article 4(1) of the GDPR.

II. HOW DOES EE-ISAC OBTAIN PERSONAL DATA?

Personal data may be obtained and collected by EE-ISAC in the following ways:

- When completing and submitting the EE-ISAC Membership and Confidentiality Application as a representative of the applying member organisation or as a contact person for billing purposes;
- When completing and submitting the EE-ISAC Representative Application Form as part of the membership registration process for the candidate member company;
- When signing and submitting the Confidentiality and Disclosure Agreement as a representative of the applying member company;
- When liaising with directors, officers or other employees of the relevant member organisation in connection with participation in activities within the EE-ISAC organisation;
- When liaising with directors, officers or other employees of external service providers or other parties forming part of the EE-ISAC network;
- When liaising with directors or officers of EE-ISAC's partners;
- If contact is made with EE-ISAC by email, p.e. to communications@ee-isac.eu or contact@ee-isac.eu, or by post to EE-ISAC's registered and operational address;
- If you subscribe to the EE-ISAC newsletter as a director, officer or other employee of a company (member or prospective member);
- If you apply for a position as part of recruitment procedures organised by EE-ISAC.

III. FOR WHAT PURPOSES DOES EE-ISAC PROCESS PERSONAL DATA?

EE-ISAC processes personal data exclusively in accordance with the purpose for which such personal data was provided to EE-ISAC. These purposes are described below:

- to arrange its corporate housekeeping, including the fulfilment of regulatory requirements such as – non limitative – UBO, EU Transparency register, …
- to organise the interactions with its members;
- to provide and carry out services for its members;
- to carry out collaborations with third-party (contract) parties;
- to organise and arrange policy making activities, including the communication of personal date to obtain access to the relevant DG's of the EU, enlist in the Transparency register, …
- to to send newsletters, provided that the recipient of this information has subscribed to receive such newsletters (e.g. announcements and/or messages relating to events, projects, articles, etc.);
- for sending (commercial) newsletters to EE-ISAC members and service providers;
- for the administrative management of membership;
- to reply to emails or letters;
- for the recruitment of (self-employed) staff or the appointment of directors;
- to implement agreements with directors and, where applicable, (self-employed) staff and partners;
- to manage its software platforms.

IV. ON WHAT LEGAL BASES DOES EE-ISAC PROCESS PERSONAL DATA AND WHAT IS THE DURATION OF THE PROCESSING?

Personal data is collected and processed by EE-ISAC on various legal grounds, which are described below in separate sub-sections.

IV.1 Necessary for the performance of a contract

The processing of personal data takes place because it is necessary for the performance of the contract between EE-ISAC and its contracting parties (members' contact persons, external service providers, directors and (self-employed) staff).

The personal data obtained by EE-ISAC in this context is retained for the duration of the collaboration. Following the end of the collaboration, the personal data will be retained for the period during which either party may bring a legal claim against the other under the terms of the agreement, or for the period during which EE-ISAC is obliged to retain personal data for accounting purposes. EE-ISAC undertakes, however, to retain, following the termination of the agreement, only those personal data necessary to fulfil the aforementioned retention purposes (the principle of 'data minimisation' in accordance with Article 5.1(c) of the GDPR).

If one of the parties has brought legal proceedings, the personal data necessary for the claim and/or the defence relating to the legal proceedings brought shall be retained until a court judgment has been handed down and has become final.

IV.2 Personal data is processed on the basis of consent

In certain specific cases, EE-ISAC will process personal data on the basis of prior explicit consent. This applies, for example, in the following cases:

- the data subject has signed up and registered as an authenticated user of the member on EE-ISAC's platforms;
- the data subject, in the course of their activities with the member, has subscribed to the EE-ISAC newsletter via the contact form on the EE-ISAC website (https://ee-isac.eu) in order, amongst other things, to stay informed about new projects, developments, initiatives, conferences and similar matters;
- the data subject, in the course of their activities with a member or prospective member of EE-ISAC, has contacted EE-ISAC by email (communications@ee-isac.eu orcontact@ee-isac.eu) or by post to EE-ISAC's registered and operational address
- the data subject, in the course of their activities, has registered with the member for (interactive) webinars or seminars or other EE-ISAC events;
- the data subject has, in the course of their activities with the member, consented to images and videos being recorded and published on the specifically designated forum (e.g. on the EE-ISAC website) in connection with EE-ISAC seminars, webinars or other events.

In this case, processing continues until such time as consent is withdrawn, or until such time as the processing can reasonably be deemed no longer necessary for the purpose or purposes for which the personal data is being processed.

IV.3 Personal data is processed to comply with legal obligations incumbent on EE-ISAC

Personal data is also processed in order to comply with the legal obligations incumbent on EE-ISAC, such as tax and accounting obligations.

However, EE-ISAC undertakes to retain only those personal data that are necessary to fulfil the retention purposes under current legislation (the principle of 'data minimisation' in accordance with Article 5(1)(c) of the General Data Protection Regulation).

IV.4 Personal data is processed on the basis of the legitimate interests of EE-ISAC or third parties

Finally, personal data is also processed on the basis of EE-ISAC's legitimate interests, such as:

- expanding its network (e.g. sending emails to contact persons at potential partners or other parties);
- sending messages as part of maintaining contact with members, partners or other contracting parties;
- sending newsletters to its members, partners and/or other parties who belong or may belong to the EE-ISAC network;

To the extent that personal data is processed for the purpose of sending announcements or messages following a previous collaboration, such personal data will be retained for a maximum of (5) five years after the end of the contractual relationship between EE-ISAC, on the one hand, and directors, members, partners or other contracting parties, on the other. Current and former directors, members, partners or other contracting parties are, in any event, always entitled to unsubscribe free of charge if they no longer wish to receive messages or announcements from EE-ISAC.

V. WHAT CATEGORIES OF PERSONAL DATA ARE PROCESSED BY EE-ISAC?

EE-ISAC may process the following personal data for the purposes set out under point III:

- surname;

- first name;
- email address;
- address;
- direct line (work) telephone number;
- mobile number;
- date of birth;
- place of birth;
- nationality;
- signature;
- job description;
- visual material from webinars, seminars or other events;
- cover letter (applicants to EE-ISAC).

VI. WHOSE PERSONAL DATA MAY EE-ISAC PROCESS?

EE-ISAC may process the personal data of the following natural persons:

- directors, officers or other employees at EE-ISAC;
- directors, officers or other employees, contact persons or staff at (prospective) members;
- directors, officers or other employees, contact persons or employees of EE-ISAC's (potential) partners;
- directors, officers or other employees, contact persons or employees of EE-ISAC's (potential) contracting parties;
- individuals who have registered as speakers at EE-ISAC seminars, webinars or other events;
- individuals who have signed up and registered to use the I-BUS shuttle service (passengers);
- individuals who contact EE-ISAC by email (communications@ee-isac.eu orcontact@ee-isac.eu) or by post at EE-ISAC's registered and operational address;
- job applicants who apply to EE-ISAC in response to a recruitment process or through a speculative application.

VII. APPROPRIATE TECHNICAL AND ORGANISATIONAL MEASURES

EE-ISAC is responsible for the processing of personal data. Consequently, as the data controller, EE-ISAC takes all appropriate technical and organisational measures to protect the data subject's personal data against accidental or unauthorised destruction, accidental loss and any other unauthorised processing of personal data.

VIII. NO UNAUTHORISED DISCLOSURE OF PERSONAL DATA TO THIRD PARTIES

Personal data processed by EE-ISAC will not be shared with third parties without a valid reason. Such a valid reason is a situation in which the disclosure of personal data is required for the performance of the agreement.

Personal data may also be disclosed by EE-ISAC to third parties in order to comply with a legal obligation (e.g. to public authorities).

Furthermore, EE-ISAC will not disclose the personal data it has obtained to third parties unless this is necessary for the following purposes:

- for the purposes of IT and network security and maintenance;
- for the purposes of tax and accounting obligations;

To the extent that third parties qualify as data processors, EE-ISAC has entered into a data processing agreement with these parties, whereby the data processor provides adequate safeguards to ensure that the processing of personal data complies with the requirements of the GDPR and national legislation, and that the protection of data subjects' rights is guaranteed.

EE-ISAC may also transfer personal data to partners and members for the purpose of organising events with or by partners/members. The partners/members are listed on the EE-ISAC website (https://ee-isac.eu). The data subject acknowledges that EE-ISAC cannot be held responsible for the further processing of personal data by that partner or member. The data subject therefore declares that they are subject to the privacy policy of the relevant partner or member and will request and carefully read this policy.

IX. RIGHTS OF DATA SUBJECTS

Data subjects whose personal data are processed have the right at all times to access their personal data free of charge and may correct them (or have them corrected) if they are inaccurate or incomplete.

Furthermore, the data subject has the right to have the data erased where there are grounds for doing so and to have the processing of their personal data restricted – also where there are grounds for doing so. The data subject also has the right to object to the processing of their personal data.

EE-ISAC will accommodate these rights to the extent possible in light of the performance of the agreement and/or its legal obligations.

If the data subject wishes to contact EE-ISAC with a view to exercising a specific right, EE-ISAC requests that the data subject submit their request in writing by post (to the address of EE-ISAC's registered office) or by email (contact@ee-isac.eu), enclosing a copy of their identity card. This enables EE-ISAC to verify that the request is being made by the person authorised to do so and to prevent data from being unlawfully disclosed to third parties.

The data subject has the right at any time to lodge a complaint regarding the processing of personal data with the Belgian Data Protection Authority:

By post to the following address:

Drukpersstraat 35
1000 Brussels

or online via the website of the Belgian Data Protection Authority:

https://www.gegevensbeschermingsautoriteit.be/burger/acties/klacht-indienen

X. OBLIGATIONS OF MEMBERS, PARTNERS AND OTHER PARTIES

Where personal data is obtained by EE-ISAC from member companies, partners or other external parties with whom EE-ISAC collaborates, the latter undertake to inform the data subject(s) whose personal data is disclosed to EE-ISAC of this EE-ISAC privacy statement without delay.

XI. AMENDMENTS

EE-ISAC reserves the right to amend this privacy statement at any time. Any amendments will be published on the website https://ee-isac.eu or, where appropriate, notified by email.

XII. CONTACT

If you have any questions regarding the processing of your personal data or EE-ISAC's privacy statement, please feel free to contact EE-ISAC at its registered office:

Avenue Marnix 30 b14
1000 Brussels

You can also contact us by email or telephone:

contact@ee-isac.eu (EE-ISAC SECRETARIAT)
+32 (0) 499 247 512