



## **Specific Code of Conduct for the Processing of Personal Data for ERTICO Congresses**

### **1. Objective of this document**

1.1. ERTICO is a public-private partnership of 120 companies and organisations representing service providers, suppliers, traffic and transport industry, research, public authorities, user organisations, mobile network operators, and vehicle manufacturers.

The services provided by ERTICO (EUROPEAN ROAD TRANSPORT TELEMATICS IMPLEMENTATION COORDINATION ORGANISATION SCRL, avenue Louise 326 at 1050 Brussels, RPM : 0445.743.506) consist of organizing and coordinating events, seminars, workshops, courses, conferences, congresses, e-learning, and other forms of events, as well as providing logistical and organizational support for these services. These services are referred to below as '(the) Services'.

1.2 This document establishes a specific data protection policy for the permitted lawful access to and use of personal data, processed by ERTICO in the context of the Services.

This policy applies to ERTICO which processes and manages personal data regarding the Users of its Application during each stage of the data lifecycle (typically, collection, protection, use, updating, reuse in some cases, archiving and purging).

The "Application" is / are the IT systems managed and hosted by ERTICO to support the processes and activities of the Services. The application owner is the person defined by ERTICO who decides which users or user roles can access the Application(s) and what information they can access.

Under the present policy, the "User" is the data subject which is also author, distributor or license holders of works of authorship being used for the Services, through the Application. The User is also being referred to as "you" below.

### **2. Data protection requests**

ERTICO has appointed a Data Protection Expert ("DPE") within ERTICO. This person has adequate expertise in privacy and information security. The tasks of the ERTICO DPE are:

- to align and coordinate approaches to privacy and information security within and across ERTICO's various activities to ensure a systematic approach;
- to ensure the implementation and enforcement of data protection legislation and the present policy within ERTICO.



ERTICO asks you to send your requests, questions and possible complaints to the mailbox of the service, by email: [privacy@mail.ertico.com](mailto:privacy@mail.ertico.com) or by post: Data Protection Expert of ERTICO, FAD Department, Avenue Louise 326 to 1050 Brussels (Belgium).

### 3. Complaints

If you have any questions about this policy or if you wish to make a complaint, you can contact us or by mail using the contact information mentioned above.

You also have the right to lodge a complaint with the Belgian Data Protection Authority: Rue de la Presse 35, 1000 Brussels, +32 (0) 2 274 48 00 +32 (0) 2 274 48 35, [contact@apd-gba.be](mailto:contact@apd-gba.be).

### 4. Personal Data Categories processed in the context of the Services

Personal data you share with us as part of the Services, via the Application:

- Identification and contact details: surname, first name, professional address and locality, professional e-mail address, telephone and/or mobile phone number;
- Credentials for a user account: username, password, security question and answer to this question, login times ...;
- Information about the ERTICO Services you participate to (CRM);
- User's biography;
- Complaints or feedback formulated through our support channels about your experience with ERTICO, comments, suggestions, testimonials and other forms of feedback;
- Other data and content exchanged, communicated and shared by you through ERTICO products, websites and applications;

Technical data you communicate with us, when using our Application (cookies or similar): See <https://itseuropeancongress.com/cookie-policy/>

### 5. Finality and lawful basis

Data protection legislation requires that personal data is processed lawfully and fairly with respect of the data subject. The regularity of the data processing implies the existence of a lawful basis.

In the context of the present policy, personal data are being processed by ERTICO for the following purposes:

- **Event organization.** This data processing is lawful due to the conclusion of a contract with you regarding the intellectual property rights of your works of authorship and the usage rights and obligations regarding the Application;
- **Helpdesk services, maintenance and security.** Lawful due to the legitimate interest of ERTICO to provide you with our Services and contract execution;



- **Product Development.** Lawful due to the legitimate interest of ERTICO to provide you with its Services for continuous improvement, maintenance and optimization of our products, services, websites and applications and securing them.

## 6. Loyalty, transparency and proportionality

ERTICO guarantees that the personal data processed:

- Are processed for specified, explicit and legitimate purposes, and are not further processed in a manner inconsistent with the original purposes for which the data were collected.
- ERTICO will at all times clearly communicate the purposes before starting a data processing.
- The data processing will be proportional, within the limits of what is necessary for the purposes for which the data were collected. ERTICO will not process the personal longer than necessary.
- ERTICO secures the data appropriately, in order to minimize the risks for the data subjects.
- As specified below, the processing is linked to a specified retention period, which corresponds to what is (strictly) necessary for the concerned purposes.
- The data processing activities take into account the data life cycle: where necessary, the data will be updated and/or deleted. ERTICO has adopted measures to provide access to the data, erase and / or correct the personal data, taking into account the specificities of the processing (lawfulness, purposes).

## 7. Confidentiality and integrity

ERTICO has adopted technical and organizational measures to ensure that the processing of personal data is carried out with appropriate safeguards to protect the data against unauthorized access or unlawful processing and against loss, destruction or damage.

More in particular, ERTICO has taken and is taking measures to secure them and protect them against any loss, modification or unauthorized access:

- By updating security measures as the technology evolves, as needed (e.g. the Application is only accessible through “https”; password rules have been implemented);
- By ensuring that your data is only accessible to authorized personnel: the personal data is only accessible to the ERTICO workers and subcontractors on a “need-to-know” basis. More in particular, only collaborators that are responsible for the relevant Services (so-called Program Managers) gain access to the Application and underlying personal data processed via the Application;
- By requesting a proof of identity before being able to provide you any personal information concerning you;
- By performing periodic back-ups and storing the personal data on secure servers;



- By deleting and/or anonymizing your data at the end of the retention period (namely as soon as it is no longer needed for the finalities pursued);
- Those who have access to the personal data have followed or will be following trainings in the processing of personal data and how to process your personal data. They are bound by the confidentiality clauses to guarantee the integrity and confidentiality of your data.

## **8. Transfer of personal data**

The personal data are exclusively transferred to subcontractors with whom we have a contract in place, regarding the processing for specific purposes, on a "need to know" basis.

We have taken the necessary steps to ensure that all recipients of your data provide sufficient and appropriate safeguards to ensure the security (including the integrity and confidentiality) of your personal data.

ERTICO of course also closely monitors how the data is being processed by its subcontractors.

In particular, the Application is being developed and hosted by the third party NEXT. NEXT is hosting the personal data on the platform of Amazon Web Services, under the terms and conditions available here: <https://aws.amazon.com/blogs/security/aws-gdpr-data-processing-addendum/> .

The personal data is hosted in Ireland, and limited to the finality and data retention period for the data processing, as specified in the present policy.

We will always ask your prior approval, before sharing your personal data or forwarding it to a country outside the European Economic Area. Your personal data is exclusively disclosed in accordance with the present privacy policy and / or as required by law.

## **9. Retention of the Personal data**

ERTICO does not store personal data for longer than is necessary for the specific purpose for which it is collected. After careful evaluation, ERTICO has implemented the following retention policy:

- ERTICO creates a new instance (typically a new database) for each congress.
- The personal data of each instance is kept during 26 months rolling. This corresponds the registration period for the current event + the event immediately after that event.

Example: The personal data being processed for "Event 2019" is deleted as soon as we can decommission that platform. This is done as soon as N+1 Event is open for submissions. The instance for Event 2019 is "active" in the period from September 2018 until September 2019. The instance for Event 2020 is available in the period from September 2019 to September 2020. The instance of Event 2019 is being decommissioned as soon as the platform for Event 2021 is active for submissions (= September 2021).

The works of authorship uploaded in the Application (e.g. research papers, articles, powerpoints etc.) may also contain personal data. If this is the case, in view of the proportionality principle, ERTICO will remove any excess personal data before it further processes them for its Services. As a general rule, the works of authorship will only contain



name + surname + affiliation of the author(s).

## **10. Data Subjects' Rights**

The law provides with various rights relating to the processing of personal data, so that data subject can continue to exercise sufficient control over the processing of its personal data:

- *Right of access and rectification of personal data:* You have the right to obtain confirmation from ERTICO which personal data are being processed. For the sake of facility, you can find most personal data we process already in the Application itself (see the “your profile” section in the Application), where you can also rectify any inaccurate recorded data. Should you also want to rectify the email address or other data we process, please contact us, as indicated above.
- *Right to delete personal data:* You may request the deletion of your personal data, being understood that when we are processing your personal data based on the execution of the agreement we have with you, we will delete your personal data as soon as the announced retention time has lapsed and/or the agreement is terminated.
- *Right to limit the processing of personal data:* You may request the limitation of the processing if the accuracy of the personal data is in question and during the period necessary for the verification of their accuracy.
- *Right to oppose the processing of personal data:* You may object to certain data processing. This is not the case when it comes to the performance of a contract or the performance of a legal obligation or legal action.

## **11. Procedure concerning the exercise of rights**

Within ERTICO, the data subject can exercise his rights by sending a request to the DPE as stipulated above. ERTICO reserves the right to ask the person concerned to identify him/herself in order to ensure that the effective exercise of the rights is requested by the person concerned (and not someone else who does not have the right to ask for this information).

ERTICO will respond to the request of the interested party within a maximum of one month. Otherwise, ERTICO informs the person concerned of the reasons for his inaction or the delay in following up the request.

Of course, if necessary, ERTICO will also make the necessary efforts to inform the recipients of the personal data of the data subject that the data subject is exercising the right to correct, delete or limit the processing.