



## Data privacy policy for alumni of the ECOO European Diploma in Optometry and the European Qualifications in Optics

### *Policy information*

The European Council of Optometry and Optics (“ECOO”) is the European umbrella association representing the interests of optometrists and opticians in Europe. It aims to promote eye health to the public across borders and to harmonise clinical and educational standards of optometric and optical practice throughout Europe. To this end, ECOO developed the European Diploma in Optometry and the European Qualification in Optics, which students can obtain via ECOO accredited university courses<sup>1</sup>. The European Diploma in Optometry can also be obtained via the independent examinations organised by ECOO’s German member, the Zentralverband der Augenoptiker (ZVA), until 2019.

This policy relates to the data ECOO receives, stores and processes on people holding the ECOO European Diploma in Optometry or the European Qualification in Optics (Data Subjects: “Alumni”), whether they have received these via the independent examinations or via an accredited university programme. ECOO takes the data privacy of its Alumni very seriously and complies with the European Union (EU) General Data Protection Regulation (Regulation 2016/679, “GDPR”).

This policy has been prepared by Fabienne Eckert, Secretary General of ECOO, who is in charge of the data management within ECOO. It has been approved by the Executive Committee of ECOO on 10 May 2018, on which date it became operational. The next review of this policy will take place by 10 May 2021.

### *Purpose of the policy*

The purpose of this policy is to ensure Alumni are fully informed as to the data that ECOO receives, stores and processes on them as well as how it is safeguarded. This policy also clarifies the distinction between:

- the Basic Alumni Database held by ECOO for proof and record of an individual holding the European Diploma in Optometry or the European Qualification in Optics.
- the Alumni Network Database to which Alumni can opt-in by filling-in a dedicated form.

### *Lawful basis*

The lawful basis of the Basic Alumni Database as per Article 6 of the GDPR is “Legitimate interest” and for the Alumni network database is “Consent”.

### *Types of data*

The type of data held on Alumni is non-sensitive personal data.

- Basic Alumni Database: Full name, date of graduation and institution of graduation.

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<sup>1</sup> <http://www.ecoo.info/european-diploma/educational-institutions/>



- Alumni Network Database (based on voluntary opt-in): in addition to basic alumni database information, the postal address, e-mail and date of birth is requested. In addition, Alumni can consent to:
  - o be added to the ECOO Newsletter distribution list and to be contacted by ECOO or the European Academy of Optometry and Optics (EAOO) for the purpose of surveys, questions and updates
  - o agree to be added to the alumni mailing list available to other alumni to allow for an exchange of information
  - o agree for their name to be mentioned on the ECOO website under the category “Diplomats of the European Diploma in Optometry”

### *Policy statement*

ECOO commits to:

- Comply with the General Data Protection Regulation (Regulation 2016/679, “GDPR”).
- Respect the rights of the individual including to access, rectify/correct, update, restrict or delete its data as foreseen by the lawful basis.
- Not to disclose information contained on the basic alumni and alumni network database to any third parties, in particular for marketing or promotional purposes.
- Have in place a Data Protection Breach Policy which will be used to investigate fully any potential data protection breaches
- Be open and honest with alumni on the data held and processed.
- Safeguard the data held by ECOO

### *Responsibilities*

The Executive Committee composed of the Directors of ECOO have the overall responsibility for ensuring that ECOO complies with its legal obligations. The person responsible for ECOO’s data management is Fabienne Eckert, Secretary General of ECOO. She is in charge of briefing the Directors of ECOO on data protection responsibilities, reviewing data protection and policies, handling data subject requests and notification to relevant bodies if applicable.

### *Security*

The Basic Alumni Database and the Alumni Network Database is securely stored in the Secretariat’s IT system and is password protected. The database is backed-up and also secured through encryption and password protection.

### *Data recording*

The data is received via the following channels:

- Basic Alumni Database:
  - o data received from an accredited University, or
  - o data received from ECOO’s member Zentralverband der Augenoptiker (ZVA), who manages the independent examinations
- Alumni Network Database:
  - o data received directly from Alumni via a filled-in form (optional opt-in)



### *Transparency*

ECOO will inform Alumni in case of any changes to this policy or in the way their data is being recorded, kept and safeguarded.

The data contained in the Basic Alumni Database is based on legitimate interest and is collected and kept for the following purposes only:

- Prepare the physical Diplomas or Certificates with the person's name
- Keep a record and proof of a person holding the European Diploma in Optometry or the Qualifications in Optics

The procedure for Alumni to update, delete (opt-out) or access their data contained in the Alumni Network Database is to notify the Secretary General in writing (electronic means accepted). Please refer to the [Data Subject Access Right Policy and Procedure](#) for further details.

### *Contact details*

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