



## Data privacy policy for the ECOO Newsletter

### *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.

ECOO issues an electronic newsletter three times a year, which is shared with its members (including members of its Board of Management and Board of Examiners) or any other person who explicitly requested to receive it (collectively referred to as the “Data Subjects”). The objective of the newsletter is to inform members or interested parties of ECOOs activities or any other developments of relevance at EU or national level.

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 on 10 May 2021.

### *Purpose of the policy*

The purpose of this policy is to ensure Data Subjects are fully informed of why they receive the ECOO Newsletter and what data is held on them.

### *Lawful basis*

The lawful basis as per Article 6 of the GDPR of ECOO members (including members of its Board of Management and Board of Examiners) receiving the Newsletter is “Legitimate interest” and for any other recipient who requested to receive the Newsletter is “Consent”.

### *Types of data*

The type of data held for the distribution of the ECOO Newsletter is non-sensitive personal information, which consists of the name, organisation and e-mail address of the individual. The E-mail address is added to the Newsletter electronic mailing list.

### *Policy statement*

ECOO commits to:

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



- 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 notifications to relevant bodies if applicable.

### *Security*

The ECOO Newsletter mailing list is securely stored in the Secretariat's IT and mailing system and is password protected. The mailing list is backed-up and also secured through encryption and password protection.

### *Data recording*

The data is received either

- Through the membership database of ECOO (including members of its Board of Management and Board of Examiners) as members receive the Newsletter as part of the ECOO membership
- Through explicit written request (electronic means acceptable) by an interested external party to receive the ECOO Newsletter.

### *Transparency*

ECOO will inform Data Subjects 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 ECOO Newsletter mailing list is used for the purpose of distributing the ECOO Newsletter only.

The procedure for members to access or update their data and for external interested parties to update, access or delete their data, is to send a written notice to the ECOO Secretary General (electronic means accepted). Please refer to the [Data Subject Access Right Policy and Procedure](#) for further details.

### *Contact details*

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