

# Data privacy policy for ECOO Members, Affiliated Members, Members of the European Qualifications Board, Board of Examiners and Accreditation panel

# 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 is a membership-based organisation and its members are national professional optometric and optical associations from across Europe as well as companies who have been accepted as Affiliated members. This policy also covers members of the ECOO European Qualifications Board, Board of Examiners and ECOO accreditation panel (collectively referred to as "Data subjects"). When joining ECOO, members agree to comply with the <a href="Statues">Statues</a> and <a href="Rules of Procedure">Rules of Procedure</a> of ECOO, which stipulate the obligations and principles to abide to.

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 policy has been reviewed in May 2021 and the next review is foreseen by the end of May 2024.

# Purpose of the policy

The purpose of this policy is to ensure Data Subjects are fully informed of the data that is collected, held and processed by ECOO ("Membership Database").

# Lawful basis

The lawful basis as per Article 6 of the GPDR of ECOO holding data on its members is "Legitimate interest".

# Types of data

The type of data held in the Membership Database is non-sensitive personal information, which consists of the country, name of the national association or company, its postal address and the full name, e-mail, phone number and position of the ECOO delegates.

For the members of the European Qualifications Board, Board of Examiners and Accreditation panel the data held includes the country, the full name, e-mail and phone number.

The e-mail addresses of the Data Subjects are added to the mailing lists of ECOO for e-mail correspondences.



# 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 and update its data as foreseen by the lawful basis as well as to delete its data in case of membership termination.
- Not to disclose information contained in the Membership Database to any third parties 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 Membership Database and mailing lists are 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 from ECOO members directly when they apply for membership or when they inform the Secretary General of any changes in the contact details provided. The Secretary General may regularly request Data Subjects to verify and update the information contained in the Membership Database and mailing lists.

# *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 Membership Database and mailing lists is solely used by ECOO to communicate with Data Subjects on its activities, to distribute the ECOO newsletter, provide updates on developments at EU or national level, communicate about meetings, coordinate activities, share insights, request information, issue surveys or any type of interaction to help ECOO effectively serve its members and affiliates that serves its overarching mission.

Upon termination of membership, the data contained in the Membership Database will be deleted unless the former member explicitly agrees for contact details to be retained for future interaction.



The procedure for data subjects 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 <a href="Data Subject Access Right">Data Subject Access Right</a> Policy and <a href="Policy and Procedure">Procedure</a> for further details.

# Contact details

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