Missing Children Europe Privacy Policy (25 May 2018)

Introduction

This policy (the “Privacy Policy”) describes how we collect, use, transfer and disclose information relating to you (“Personal Information”) that may be obtained through different means.

The controller of your personal data is Missing Children Europe with registered office at Rue de l’Industrie 10, 1000 Brussels, Belgium and recorded in the Crossroads Bank for Enterprises under the number 0478.917.308. A declaration was submitted to the Commission for the Protection of Privacy with regard to the processing of your personal data.

We process your Personal Information in compliance with the privacy and data protection laws in force in Belgium. Missing Children Europe, by means of the present Privacy Policy, also puts itself into compliance with the European Regulation 2016/679 of 27 April 2016 on the protection of personal data.

We will not use your Personal Information for purposes unrelated to those described in this Privacy Policy without first notifying you and, where required, offering you a choice as to whether or not we may use your Personal Information in this different manner.

This Privacy Policy can be updated from time to time, and so we recommend that you consult it on a regular basis.

Definition of personal data

For purposes of this policy, personal data is any data or combination of data in any form or medium, relating directly or indirectly to an identified or identifiable natural person; this includes, for example, contact information, pictures, bank account number, IP address.

Personal data we collect directly and how we use it

Missing Children Europe may collect your personal data whenever you interact with us including in the following contexts:

- When you register for our newsletter
- When you attend our events
- When you contact us with a request
- When you complete a survey
- When you make a donation

With this data, we may contact you because you have either given your consent to be contacted, or because we have a necessity to fulfil a transaction with you (such as processing a payment), or because by contacting you we have a legitimate interest such as fulfilling the mandate of Missing Children Europe to advocate, protected and prevent children from going missing, raising visibility of our issues to the public and for fundraising purposes.

Situations where we may contact you:

- To invite you to an event
• For administration purposes (to confirm event registration for example or update details)
• To process your donation
• To fundraise
• To provide you with information about our services
• To update your information or seek your preferences

The information we collect includes:

• Name
• Address
• Email address
• Financial information
• Communication preferences
• Information about your professional role
• Information you provide if applying for a job, tendering to provide us a service, if you want
to volunteer or take up an internship.

Sensitive information is only collected if it fulfils a direct purpose such as allowing access to an
event (to ensure there are appropriate facilities if you are disabled, ID number to confirm access
to the Parliament etc).

You can withdraw your consent at any time by emailing info@missingchildreneurope.eu or by
updating your preferences by clicking on the unsubscribe button at the bottom of every newsletter
or newsflash you receive.

You are not obliged to release to us your personal data, but you do understand that the granting
of certain services becomes impossible if you refuse.

Information we receive about you from additional sources

We may collect additional data about you that you have not actively provided to us. This would
be to allow us to conduct due diligence and ethical screening on potential partners, volunteers
and donors. We may also supplement our data with information available publicly – such as your
appointment as a director of a company or data that you made public yourself, such as
information posted on your website, blog or via social media or data that have appeared in the
press. Information collected like this helps us to ensure that we tailor our communication on our
services to your interests, geographical location etc.

Missing Children Europe may also receive your data related to the cases of missing children from
our member organisations. This happens in two ways:

1. Cases that are transferred to us though the 116000@missingchildreneurope.eu mail
2. Situations when we ask for stories to our members for workshops, case studies, training etc.

Information via your website activity

Missing Children Europe manages the following websites:
What is a cookie?

A cookie is a small text file that a website saves on your computer or mobile device when you visit the site. It enables the website to remember your actions and preferences (such as login, language, font size and other display preferences) over a period of time, so you don’t have to keep re-entering them whenever you come back to the site or browse from one page to another.

You will be invited to enable the use of cookies when you enter the site. Enabling these cookies is not strictly necessary for the website to work but it will provide you with a better browsing experience. You can delete or block these cookies, but if you do that some features of this site may not work as intended.

How do we use cookies?

Our websites use cookies for the following purposes:

- to remember users’ actions, to identify the user over the course of their visit
- to remember if you have agreed (or not) to our use of cookies on this site
- for measurement of visitor’s use of the site, for example which pages are most visited and how well the site functions. The information gathered for this purpose includes IP address, operating system, web browser, pages visited, demographics of the users, the device used, and where the visit originated. Google provides certain privacy options and choices in this regard, which are described here
- to meet our legal obligations and in relation to legal claims, and to prevent, investigate and remediate possible breaches of our terms and conditions and threats to the integrity of our website.

Some pages and videos embedded in our pages use a cookie to anonymously gather statistics on how you got there and what videos you visited. Our websites also contain links to Facebook, Twitter, LinkedIn and a number of similar social networks. When you use these share buttons, a third-party cookie is installed. Please note that we do not have any control over how the information in these cookies is used nor do we have access to it. Please refer to the cookie policies of the relevant provider for more information.

While the information gathered by the cookies relates to you, it is not used to identify you personally and the data remains fully under our control. These cookies are not used for any purpose other than those described here.

How to control cookies

You can control and/or delete cookies as you wish – for details, see aboutcookies.org. You can delete all cookies that are already on your computer and you can set most browsers to prevent
them from being placed. If you do this, however, you may have to manually adjust some preferences.

Finally, our website provides an email address on which you can reach us. Personal information we receive through this channel is used to respond to your request. We may ask if you want to be added to our contact database.

**Information via your app activity**
We are affiliated with certain apps:

- Miniila
- Remumber

Please refer to the individual privacy policy related to these apps to see what information we record, why and how we use this.

**How long we keep your data**

We will only retain personal data for as long as we are required to do so by applicable law(s), or for as long as necessary for the purpose(s) for which it is processed. We will delete personal data when it is no longer needed and, in any case, upon expiration of the maximum storage term set forth in applicable law.

**Transfer to third parties**

Missing Children Europe will never pass on your personal data to third parties, with the exception of service providers who handle support in so far as this is necessary for the technical provision of services and/or if they are obliged to do so on the basis of a statutory provision or a judicial ruling. Such providers include MailChimp for newsletters, SurveyMonkey for surveys and event registrations, Child Focus for some donation processing.

We shall make reasonable attempts to inform you in advance of the fact we disclose your data to named third parties, but you also acknowledge that this is not technically or commercially feasible under all circumstances.

Missing Children Europe will not sell your personal data, rent them out, share them or otherwise make them commercially available to third parties, except as described above or unless with your prior consent.

In rare cases it can happen that Missing Children Europe must reveal your personal data subject to public authorities, government regulators or other law enforcement officials and the courts, as required or permitted by law or when compelled by a binding order. We shall make reasonable attempts to inform you in advance about this, unless it is subject to legal restrictions.

When sharing your Personal Information with entities world-wide that do not provide for an equivalent level of data protection, we will put in place contractual guarantees in accordance with applicable data protection law.

**Data Security**

We maintain appropriate technical, physical and organisational measures to protect Personal Information against accidental or unlawful destruction or accidental loss, alteration, unauthorised
disclosure or access. Unfortunately, no information security system can be 100% secure. As a result, although we strive to protect your Personal Information, we cannot ensure or warrant the security of the Personal Information against unpredictable loss or unauthorised access. Any breach of data will be reported within 72 hours to the relevant data protection authority.

Your Rights

Subject to restrictions under applicable law, you have the right to request from us access, rectification, erasure, restriction and deletion, and portability of your personal data. Such requests can be addressed to info@missingchildreneurope.eu. Complaints can be addressed to the data protection authorities.

Data Integrity

We take reasonable steps to ensure that the personal data we collect is relevant for the purposes for which it is to be used and that the personal data is reliable for its intended use and is accurate, complete and current. You are responsible for making sure that your information is up-to-date and accurate when you provide it to us and where our services offer you the tools to maintain your information.

Changes to This Privacy Policy

If we make any material changes to this Privacy Policy, we will post a revised link on the home page of the website that indicates “Revised Privacy Policy” or a comparable notification about the changes. You should check this website periodically to see if any recent changes to this Privacy Policy have been made. You can also tell if this Privacy Policy has changed recently by reviewing the Effective Date posted at the beginning of this Privacy Policy.

Links to Other Internet Websites

The privacy practices set forth in this Privacy Policy are for Missing Children Europe website and other specified activities only. Other websites hosted by third parties may have different practices. If through our website or our other services you link to or otherwise visit any other websites managed by third parties, please review the privacy policies posted at those websites. We have no control over those websites and are not responsible or liable for the policies and practices followed by third parties.

Contact Us

If you have any questions about this Privacy Policy or our privacy practices, please contact us at info@missingchildreneurope.eu

If you think that your complaint has not been adequately addressed, you may have a right to lodge a complaint with the Supervisory Authority for privacy in your country.