

## Privacy Policy

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This Policy is established by :

AISBL APEEE Association des parents d'élèves de l'école européenne de Bruxelles II-Woluwe,  
Address: Avenue Oscar Jespers, 75, 1200 Woluwe-Saint-Lambert  
e-mail: [data-protection-office@woluweparents.org](mailto:data-protection-office@woluweparents.org)

It is registered under the CBE number: 0419.537.272

Hereafter, the "APEEE" or "we", "our".

We are particularly attentive to the protection of personal data (hereinafter referred to as "data") and to the respect of private life of all persons who come into contact with us.

We act in full transparency, in accordance with related national and international provisions, in particular Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation) (Text with EEA relevance) (hereinafter referred to as the "General Data Protection Regulation" or "GDPR").

This privacy policy describes the measures taken in relation to the processing of your personal data when using our services including our website <https://www.woluweparents.org/> (hereinafter referred to as the Website) and your rights as a user of our services.

It may be modified at any time in order to comply with any regulatory, legal or technological developments. We invite you to consult it regularly.

You can react to any of the practices described below by contacting us.

### **1. Who are we ?**

The APEEE informs, represents and acts on behalf of all parents of the EEB2 - Woluwe, regardless of whether or not they are members of our association, with the following objectives:

- to promote the widest possible participation of parents in the life of the school;
- to represent the educational, pedagogical and family interests of the parents to the school authorities and to local, regional and European authorities
- to inform the school authorities of parents' wishes and suggestions concerning the organisation of the school;
- to organise, in liaison with the School Board, extra-curricular activities and any other activity at the service of the children or parents, such as canteen, cafeteria, transport, extra-curricular activities, nursery and study, locker hire;
- to collaborated in the search for solutions to problems encountered by parents in the education of their children
- to ensure that parents are adequately informed of the decisions or deliberations of the various competent authorities concerning the school, including the decisions or deliberations of the Association

- to promote links and, where appropriate, establish direct collaboration with the Parents' Associations of other European schools, in particular with those based in Brussels;
- to participate in the prevention of disciplinary problems and potentially risky behaviour;

The APEEE is a forum for dialogue and action open to all parents of all language sections. We encourage parents to participate actively in the various decision-making bodies of the school and to promote the "family perspective" in a variety of programmes and educational or community projects in which our children participate. The APEEE is also an important source of support for any family facing difficulties in the system. The APEEE works to ensure the best educational environment for the children of the European School Brussels II.

## **2. Who is this policy addressed to ?**

This declaration is intended for all natural persons whose data we process, such as parents and/or pupils who use our services or send us an application.

We also process the data of persons who voluntarily provide us with their data, such as prospective parents of pupils.

This declaration is also addressed to all natural persons who act as contact persons for one of our suppliers or for any other company (company, government, employers' or employees' professional association, school, university, etc.) with whom we have had, have or wish to have a collaboration. This includes people working for the European School and non-profit organisations that cooperate with us.

Please note that your data will be used in accordance with this privacy policy.

## **3. Why do we process your data ?**

We collect and process your personal data for a number of different reasons based on a legal basis determined by the GDPR (for example, to comply with a legal obligation to which we are subject or to perform a contract with you).

The table below sets out the purposes and legal basis for using your personal data.

<i><b>Processing</b></i>	<i><b>Purposes</b></i>	<i><b>Legal basis</b></i>
Management of parents who are members	We process your personal data to carry out operations relating to the management of your membership to our association and to give you access to our activities and services.  E.g.: your registration as a member	In accordance with Article 6.1.b) of the GDPR, this processing is necessary to perform contractual or statutory measures.  This processing is necessary for the fulfilment of our legal obligations in

		accordance with Article 6.1.c) of the GDPR.
Management of our services and activities	<p>We process personal data in order to provide our services in accordance with our statutes.</p> <p>E.g. transport services, canteen, extra-curricular activities and daycare.</p> <p>Regarding pupils 'data, this enables the updating classes and the proper provision of our services in full security.</p> <p>We process personal data in the context of support projects responding to a call for projects.</p> <p>E.g. implementation of welfare or art projects; group purchase of various materials such as calculators, sports uniforms; book exchange.</p>	<p>This processing is necessary for the performance of our obligations to you, in accordance with Article 6.1.b) of the GDPR.</p> <p>This processing is necessary to fulfil our legal obligations in accordance with Article 6.1.c) of the GDPR.</p>
Management of parent delegates and representation (working groups, task forces, etc.)	We process personal data in order to represent parents and act on their behalf in various working groups, task forces, committees or other organisational structures	<p>This processing is necessary for the performance of our obligations to you in accordance with Article 6.1.b) of the GDPR.</p> <p>This processing is also necessary for the performance of our legal obligations in accordance with Article 6.1.c) of the GDPR.</p>
Managing elections and our bodies	We process your personal data to ensure the management of our AISBL, to organise our Boards of Directors and General Meetings, as well as the elections of our bodies, including the sharing of data with the Moniteur Belge, or the UBO register for official publications.	This processing is necessary for the performance of our legal obligations in accordance with Article 6.1.c) of the GDPR.
Managing our communication	<p>We process personal data in order to provide you with information about our services.</p> <p>We may use your data to fulfil our legitimate interests or those of third parties, without prejudice to your interests or fundamental rights and freedoms, to offer and promote all services and/or to share with you informative messages that</p>	We may process your data, in accordance with the provisions of Article 6(2)(f), on the basis of our legitimate interest, provided that we have weighed this interest against your interests or fundamental rights and freedoms by considering your "reasonable expectations".

	are consistent with what you may reasonably expect from us in the context of our existing or possible future relationship.	You may object to this processing by contacting us.
Pre-contractual relationship management	We process your personal data in order to respond to requests and/or questions you send us (in particular via the contact form on our site), or if you send us your CV to apply for a job with us.	In accordance with Article 6.1.b) of the GDPR, this processing is necessary for pre-contractual measures.
Management of our litigation	We may use your data to meet our legitimate interests or those of third parties in defending our interests (or those of third parties) in court in the context of our existing or possible future relationship.	We also have a legitimate interest in processing personal data in order to defend our interests, in particular but not exclusively in the context of a dispute or legal action based on Article 6.1.f) of the GDPR.  We may also need to process sensitive data in this context, in accordance with the provisions of Article 9 §2, f) of the GDPR.
Management of our suppliers	We process personal data in order to fulfil our contractual obligations to you or your company.  Data from service providers related to the business may also be published on our website only with your consent in order to ensure communication.	Fulfilment of our commitments to you in accordance with Article 6.1.b) GDPR.  This processing is necessary for the performance of our legal obligations in accordance with Article 6.1.c) of the GDPR.  You have given your consent to the processing of your data in accordance with Article 6.1.a) of the GDPR.

Unless there is a legal exception, you may object to processing that is based on our legitimate interest, or on your consent, at any time by contacting us.

#### **4. What data are collected and processed ?**

We only collect personal data that is adequate, relevant and limited to what is strictly necessary for the purposes for which it is processed.

Depending on the purpose, data is collected differently.

Below we detail the personal data we collect about you, as well as the way in which we collect it.

<i>Processing</i>	<i>Data collected and processed</i>	<i>Collection method</i>
Management of parents who are members.	<p>Personal identification data (surname, first name, address, telephone number, etc.)</p> <p>Electronic identification data (e-mail address, encrypted password, etc.)</p> <p>Professional characteristics (profession, etc)</p> <p>Family data (first and last names of children, parental authority, class of children)</p> <p>Financial data (account number).</p> <p>Photographs</p>	<p>Directly from you</p> <p>We have received it by the European school</p>
Management of our services and activities	<p>Personal identification data (surname, first name, address, telephone number, order number, etc.)</p> <p>Electronic identification data (IP address, e-mail address, encrypted password, etc.)</p> <p>Personal family characteristics (marital status, custody of children)</p> <p>Financial data (account number).</p> <p>Student's personal identification data (surname, first name, address, telephone number, school identification number)</p> <p>Student's family data (siblings, ...)</p> <p>Personal characteristics of the student (age, sex, date of birth, country, language)</p> <p>Health data of some students where parents feel it is necessary for some of our activities.</p> <p>Pedagogical data (language skills, site, cycle, section, class level, grade...)</p> <p>Photographs</p>	<p>Directly from you, especially from our website (online registration)</p> <p>We have received it by the European school</p>
Management of parent delegates and representation (working groups, task forces, etc.)	<p>Personal identification data (surname, first name, address, telephone number, etc.)</p> <p>Electronic identification data (e-mail address, encrypted password, if any, etc.)</p> <p>Family data, (first and last names of children, year of schooling of children)</p> <p>Photographs (if any)</p>	<p>Directly from you</p>

<p>Managing elections and our bodies</p>	<p>Personal identification data (surname, first name, address, telephone number, etc.)</p> <p>Electronic identification data (IP address, e-mail address, encrypted password, etc.)</p> <p>Personal characteristics (age, gender, date of birth, your country, language, EU ID)</p> <p>Photographs</p> <p>Copy of identity card</p> <p>Status of parent representative.</p>	<p>Directly from you</p>
<p>Managing our communication</p>	<p>Personal identification data (surname, first name, address)</p> <p>Electronic identification data (IP address, e-mail address)</p> <p>Family data, (first and last names of children, children's school year, language section)</p>	<p>Directly from you</p> <p>We have received it from the European school</p>
<p>Pre-contractual relationship management</p>	<p>Personal identification data (surname, first name, address, telephone number, order number, etc.)</p> <p>Electronic identification data (IP address, e-mail address, etc.)</p> <p>Family data (first and last names of children, marital status)</p> <p>Personal characteristics (age, gender, date of birth, your country, language)</p> <p>Professional characteristics (profession, degree, career, etc.)</p>	<p>Directly from you</p> <p>You have made them publicly available</p> <p>From the European School.</p>
<p>Management of our litigation</p>	<p>Personal identification data (surname, first name, address, telephone number, order number, etc.)</p> <p>Electronic identification data (IP address, e-mail address, encrypted password, etc.)</p> <p>Personal characteristics (age, gender, date of birth, your country, your language)</p> <p>Financial data (account number, outstanding debts, etc.) only if you subscribe to a paid service.</p> <p>Health data and any data necessary to defend our interests in court.</p> <p>Photographs.</p>	<p>Directly from you</p> <p>You have made them publicly available</p>

Management of our suppliers	Personal identification data (surname, first name, address, telephone number, order number, etc.) Electronic identification data (IP address, e-mail address, etc.) Financial data (account number, open claims, etc.).	Directly from you You have made them publicly available
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**5. Is your data disclosed or shared with third parties?**

The data listed above is accessible to members of our team, or collaborators, if any, to our lawyers or any technical advisors, to banking or insurance organisations to the extent strictly necessary.

Your data will also be transferred between the European School and our services on the basis of your consent.

We may also transfer your data :

- a) at the request of a legal or administrative authority or court official; or
- b) in the good faith belief that such action is required to comply with any applicable law or regulation;
- c) in order to protect and defend our rights or those of other users of our services.

We may also provide access to certain data to our co-contractors, qualified as "subcontractors" within the meaning of the GDPR, to the extent strictly necessary to achieve our purposes, such as the operation of computerised or non-computerised applications or management systems.

In all circumstances, we ensure the protection of your data through confidentiality agreements.

The service providers with whom we share your data are the following:

<i>Category of service provider</i>	<i>Location</i>
Email solution providers	In Europe
Mailing providers	In Europe
IT solutions providers and infrastructure and systems maintenance	In Europe
Social networks	In Europe
Hosting/cloud service providers	In Europe
Lawyer and legal service providers	In Europe
Social secretariat	In Europe



Accountant and financial service provider	In Europe
Communication tools	In Europe and the United States
Other organisation	In Europe
Banks	In Europe

For security reasons, the list of subcontractors, their field of activity, the purpose for which the data is processed and, if applicable, the country in which the data is processed and hosted, is not available on our website, but on first request by the data subjects.

#### **6. Do we transfer your data outside the European Union?**

We make transfers to the United States. Such transfers will only be permitted if and when :

- ✓ The European Commission has issued a decision that establishes that country provides an adequate level of data protection, i.e. equivalent to that provided by European legislation. Personal data will be transferred on this basis.
- ✓ The transfer is covered by an appropriate safeguard granting a level of data protection equivalent to that provided for by EU law, such as the Commission's standard contractual clauses, a Code of Conduct, certification, binding corporate rules, consent.

The absence of an adequacy decision or appropriate safeguards, a transfer or a set of transfers of personal data to a third country remains possible if such transfer is necessary for the establishment, exercise or defence of legal claims.

#### **7. How long do we keep your data?**

The period of retention varies according to the purposes for which your data is processed. This period is limited taking into account any retention obligations imposed on us by law. You will find the list of purposes and the retention periods below.

<b><i>Processing</i></b>	<b><i>Retention period</i></b>
Management of parents who are members.	The retention period is 2 years from the end of your membership in our association.
Management of our services and activities	The retention period is 7 years from the end of the membership of the APEEE or the cessation of the activity or

	service in question in order to respond to the Commission's request in the context of the financing of the activities.
Management of parent delegates and representation (working groups, task forces, etc.)	The data will be kept for 2 years from the end of your mission as a class representative or member of a working group
Managing elections and our bodies	The period of retention of the data is 5 years from the closure of the liquidation of our AISBL. (Art. 2:143, 3:103, and 9:3 of the Companies and Associations Code)
Managing our communication	The retention period is 5 years from the last use for legitimate communication purposes
Pre-contractual relationship management	The retention period is 3 years from our last contact
Management of our litigation	The data are deleted after the execution of the judgment or the final closure of the dispute.
Managing our suppliers	The data is kept for 7 years from the last day of the year in which your data is entered into our accounting system (Art. III.86 and III.88 of the Economic Law Code and Art. 8 of the Royal Decree implementing Articles III.82 to III.95 of the Economic Law Code)

### **8. How do we protect your privacy?**

In order to ensure the highest level of security for the data collected on the website, we implement appropriate technical and organisational measures (encryption technology and security measures to protect and prevent the loss, misuse or alteration of the information collected on the websites). We take into account the state of the art, the costs of implementation and the nature, scope, context and purposes of the processing as well as the risks to your rights and freedoms.

In all circumstances, we ensure an adequate level of technical and organisational security of your data, in order to protect you from data leakage, including loss, destruction, public disclosure, unauthorised access or misuse. However, if you are aware of or suspect a data breach, we ask that you report it immediately by contacting us.

For security reasons, the list of subcontractors, their field of activity, the purpose for which they process data and, if applicable, the country in which the data is processed and hosted, is not available on our website, but on first request by the persons concerned. The same applies to the list of security measures.

### **9. What are your rights and how can you exercise them?**

Except where not permitted by a legal provision in force in Belgium, including the GDPR, under the regulations you have the following rights:

- The right of access including the right to know whether we are processing your data;
- The right to receive a copy of the data processed;
- The right to rectification of processed data;
- The right to withdraw consent;
- The right to object to the processing of personal data, in particular if the personal data is processed on the basis of our legitimate interest;
- The right to restrict the processing of processed data;
  - If you contest the accuracy of the data. Pending assessment of the interests involved before exercising the right to object to the processing of some of your personal data.
  - If the processing of your personal data is unlawful, but you nevertheless do not wish to exercise your right to data erasure.
  - If we no longer need your personal data, but you need it for legal purposes.
- The right to erasure of processed data. However, this right is not absolute and we will not be able to act on it if we are required by law to process your data.
- The right to portability of processed data, i.e. to retrieve or transfer to a third party that you designate, your personal data that we process, for your personal use, and in the format in which we store it.
- The right to lodge a complaint with the Data Protection Authority:
  - [www.autoriteprotectiondonnees.be/](http://www.autoriteprotectiondonnees.be/)
  - Rue de la Presse, 35, 1000 Brussels
  - Tel: +32 (0)2 274 48 00
  - Fax: +32 (0)2 274 48 35
  - E-mail: [contact@apd-gba.be](mailto:contact@apd-gba.be)

You can also file a complaint with the court of first instance.

For more information on complaints and possible remedies, you are invited to consult the following address of the Data Protection Authority:

<https://www.autoriteprotectiondonnees.be/citoyen/agir/introduire-une-plainte>

If you need more information about your rights, please contact us. We will respond to your request as soon as possible and, at the latest within one month of receiving your request, we will inform you of the action we have taken.

Depending on the difficulty of your request or the number of requests we receive from other people, this deadline may be extended by two months. In this case, we will notify you of this extension within one month of receiving your form.

In all circumstances, when providing this information, we are always obliged to take into account the rights and freedoms of other persons.

If you wish to react to any of the practices described in this Policy, or if you wish to exercise your rights, you may contact us by e-mail at the following address: [data-protection-officer@woluweparents.org](mailto:data-protection-officer@woluweparents.org)

or by post to the following address :

AISBL APEEE Association des parents d'élèves de l'école européenne de Bruxelles II-Woluwe,

Address: Avenue Oscar Jespers, 75, 1200 Woluwe-Saint-Lambert.

We ask the persons concerned to attach to their application the documents or information necessary to prove their identity, failing which we may return to them to request proof of their identity, for example a copy of their identity card, with a view to taking appropriate action on their application.

Finally, when the request to exercise a right is manifestly unfounded or excessive, in particular because of its repetitive nature, it may be refused or be subject to the payment of reasonable fees that take into account the administrative costs incurred in providing the information, making the communications or taking the measures requested.

#### **10. We use cookies on our websites.**

A cookie is a piece of code in the form of a file stored on your computer. Cookies help us to improve our site, make it easier for you to navigate and analyse our audience.

To learn more about our policy on cookies and other tracking devices, please visit our website under the "Cookies Policy" tab.

#### **11. What is the applicable law and jurisdiction?**

This Policy is governed by Belgian law.

Any dispute relating to the interpretation or execution of this Policy shall be subject to Belgian law.

#### **12. Watch for updates to this Policy!**

This Policy may be updated at any time without notice. We advise you to consult it regularly. The most current version can be consulted at any time on our website.  
Last updated on 26 April 2021.