



Personal Data Protection Policy

This declaration is made on this _____ of January 2025 by:

NAME:

SURNAME:

The Association of Parents of Pupils at the European School Brussels II – Evere-Woluwe (the “APEEE” Association des Parents d’Élèves de l’École Européenne) processes personal data of students, parents, board members, employees, or partners of the APEEE and the European School and/or other persons which it shares with the Board Members.

Personal data includes *“any information relating to an identified or identifiable natural person (‘data subject’); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person”* (Article 4 (1) of the GDPR)¹.

Processing of personal data means *“any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction”* (Article 4(2) of the GDPR).

APEEE is the data controller and processor of personal data under the General Data Protection Regulation (GDPR) as well as under the Belgian Data Protection Law (*“Loi relative à la protection des personnes physiques à l’égard des traitements de données à caractère personnel”*)².

Therefore, the APEEE has an obligation to implement appropriate technical and organizational measures to ensure and to be able to demonstrate that processing is performed in accordance with the above laws.

¹ 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) - <https://eur-lex.europa.eu/eli/reg/2016/679/oj>

² Loi relative à la protection des personnes physiques à l’égard des traitements de données à caractère personnel, http://www.ejustice.just.fgov.be/cgi_loi/loi_a1.pl?DETAIL=2018073046/F&caller=list&cn=2018073046&table_name=LOI&la=F&chercher=t&language=fr&choix1=ET&choix2=ET&fromtab=loi_all&tri=dd+AS+RANK+&rier=promulgation



As a Board Member you are considered as a 'third party' authorized to process personal data (personal data of students, employees, service providers and other partners of the APEEE Services), under the direct authority of the controller, the APEEE (Article 4 GDPR).

Therefore, when processing the data, you must comply with the appropriate technical and organisational measures as defined by the APEEE Data Protection Policy in accordance with your responsibility whether you act on behalf of the APEEE Services, or on your own behalf.

Information containing personal data should be kept confidential and not shared with the parents' community. If a document containing personal data is received that has to be shared (e-mail, paper document, written or oral message, etc.), such document will be anonymised. All references to personal data will be removed before sharing the document.

Information containing personal data can be shared with the Board Members on the need-to-know principle. If there is no legitimate need for other Board Members to know the information containing personal data, personal data should not be shared. In such case, a document containing personal data shall be anonymised.

In case of doubt, when you process information that is potentially personal data, you should consult the APEEE Services or the APEEE Data Protection Officer (DPO) (data-protectionofficer@woluweparents.org).

In case of a personal data breach, you are reminded that you have to inform without delay the APEEE DPO via e-mail with all available information.

A personal data breach is understood as *"a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data transmitted, stored or otherwise processed."* (Article 4 (12) of the GDPR). For instance, unlawful sharing of personal data but also the loss of telephone, laptop, passwords broken, hacked, etc.

You acknowledge that violation of the GDPR can cost the APEEE Services up to 4% of its annual turnover (Article 83 (5) of the GDPR).

Consequently, you declare to take all necessary measures and to make every effort to avoid such a breach. In case of violation of this commitment, the APEEE Services reserves the right to claim damages for any harm caused by a member resulting directly or indirectly from this violation.

Storage of information

You agree to process and store Information in the safe IT environment provided to you by APEEE (Woluweboard email addresses and related IT environment including shared protected work spaces) or on any other system for which you will then guarantee and be sole responsible for the safety and protection of the Information.

You will abide by all further directives of APEEE regarding the processing of such Information. In case of use of your personal device to process or store electronically Information, it is your personal



responsibility to secure it adequately (e.g. password or other access restrictions...) and to return and/or delete (at the choice of APEEE) this Information permanently from any computer, word processor or other device containing such Information from the moment of your departure from the APEEE Board at the latest or as soon as APEEE requests you to do so. You will make available to APEEE all information necessary to demonstrate compliance with this document and fully assist APEEE in this regard.

E-mail accounts will be closed as of your departure from the APEEE Board but will be maintained dormant on the system, so that you (but also the APEEE) can still access a copy of the e-mail accounts should need arise e.g. for the purpose of compliance with the General Data Protection Regulation, this Personal Data Protection Policy or any other applicable regulation. We invite you to delete any personal e-mails before your departure from the APEEE and will maintain your access for that purpose for 15 days after your departure. The dormant e-mail accounts will only be kept for a period of 5 years after your departure and will be treated by the APEEE conform its Data Protection and e-mail policy.

Received, understood and accepted

Name (in block letters) _____

Board mandate: year 202[]-202[]

Signature _____

Place _____ Date _____