

1. WHAT IS COVERED BY THIS PRIVACY STATEMENT?

This privacy statement tells you what personal data we process as data controllers, why and how we process your personal data when we perform our business activities or when you use our websites (“the Sites”) and any of the services we offer through the Sites, to whom we give that information, what your rights are and whom you can contact for more information or queries.

When we refer to “the Sites”, we mean the following website where we exchange information by and for our members and members’ members including all its subsites: <https://extranet.gfiainsurance.org>.

Regarding personal data that we process when you visit our general website: <http://www.gfiainsurance.org>, please have a look at our general privacy statement.

The Sites may link to other sites provided by members, members’ members or third parties. Whilst we try to link only to sites that share our high standards and respect for privacy, we are not responsible for the content or the privacy practices of other websites.

When linking to any such sites, we strongly recommend that you read the Privacy Statements on those sites, before disclosing any personal information.

2. PERSONAL DATA WE COLLECT

The main personal data that we generally collect and hold in our database is:

- identification data (eg name, job title, address, phone number, e-mail address, company name)
- data regarding the communication between us (eg e-mails sent, meetings)
- your picture (eg if we have published an article of yours in our Annual Report or if you are a speaker at one of our events and we have obtained your consent for this)

We may also process the data included in your ID or passport (such as your date of birth, ID/passport number) in order to register you for a meeting/event.

Moreover, when you use our Sites, the browser on your device automatically sends information to the server of our Sites, application which temporarily stores it in a log file. More specifically, your IP address is automatically recorded without your intervention and stored until it is automatically deleted.

3. HOW WE OBTAIN YOUR PERSONAL DATA

We may obtain your personal data in the framework of the membership relationship we hold with the association or company you work for or collaborate with.

We may obtain such personal data because you gave it to us (eg by contacting us), because someone else gave it to us (eg your employer or your colleagues) or because it was publicly available.

4. WHY WE PROCESS YOUR PERSONAL DATA

We process your personal data for legitimate business reasons. These purposes include:

- carrying out the membership agreement with the company or association you represent, work for or collaborate with (eg registration to meetings, preparing meeting conclusions and participant lists)
- facilitate exchange of information between members or (re)insurance companies affiliated to members
- sending you invitations to our events (our annual conference as well as networking events such as conferences, seminars, meetings, receptions, cocktails or any other types of gatherings)
- sending you update emails about our paid services or products
- inviting you to participate in our surveys
- invoicing and accounting
- sharing of information via the extranet
- the good organisation of our services (such as day-to-day business communication)
- dealing with enquiries, requests
- public relations
- statistics
- access control to secure access to our extranet

Your IP address will be processed for security and troubleshooting purposes.

We will use your personal data only for the purposes for which we collected it or for reasons compatible with the original purpose. If we intend to use your personal data for reasons that are not related to the original purpose, we will contact you and notify you of the legal basis that allows us to do so.

5. THE LEGAL GROUNDS FOR PROCESSING YOUR PERSONAL DATA

We process your personal data for the purposes mentioned above relying upon the following legal grounds:

- when necessary to fulfil our contractual obligations
- for the purposes of our legitimate interest and in particular, our interest to carry out our daily business activities, our membership agreement and to represent the insurance sector in the best possible way. In this respect, we will always determine case by case whether our interests are not overridden by your interests, fundamental rights and freedoms
- your consent, when necessary

Your IP address is processed based on our legitimate interest to ensure the functionality and security of the Sites.

6. YOUR RIGHTS

You have several rights concerning the personal data we hold about you. You have the right to:

- access your personal data, obtain confirmation that we are processing your personal data and request a copy of the personal data we hold about you
- ask that we update the personal data we hold about you, or correct such personal data that you think is incorrect or incomplete
- restrict our processing of your personal data where you believe that the data is not accurate or we may not have grounds for processing it
- ask that we delete personal data that we hold about you, or restrict the way in which we use such personal data if you believe that there is no (longer a) lawful ground for us to process it
- withdraw consent to our processing of your personal data (to the extent such processing is based on consent)
- ask to receive a copy of the personal data concerning you, which you have provided to us, in a structured, commonly used and machine-readable format and to transmit such personal data to another party (to the extent the processing is based on consent or a contract)
- object to our processing of your personal data for which we use legitimate interest as a legal basis, in which case we will cease the processing unless we have compelling legitimate grounds for the processing
- object at any time to the processing of your personal data for direct marketing purposes

You can also click on the unsubscribe link included in relevant mailings, including direct marketing emails, to stop receiving such communication.

In order to exercise any of your rights, you can email a request, indicating the right you wish to exercise to privacy@gfiainsurance.org. You may also use these contact details if you wish to make a complaint to us relating to your privacy.

If you are unhappy with the way we have handled your personal data or any privacy query or request that you have raised with us, you have a right to complain to the Data Protection Authority (“DPA”) in your jurisdiction.

7. RECIPIENTS OF YOUR PERSONAL DATA

All GFIA secretariat staff members will have access to your personal data on a strict “need-to-know” basis for the purposes described above.

We may disclose your personal data to our members, our members’ members, third parties that provide services to us that reasonably require access to personal data relating to you for one or more of the purposes outlined in the “Why we process your personal data” section above. The following external parties may for instance be involved:

- external service providers we rely on for various business services
- law enforcement authorities in accordance with the relevant legislation
- external professional advisors (eg law firms or consultancies)

Specifically, the personal data of contact persons of member associations or of contact persons appointed by a member is disclosed on our extranet page and is available to all other contacts that have authorised access on this website.

If our federation enters into a joint venture with or is sold to or merged with another entity, your information may be disclosed to our new partners or owners.

International transfers

In order to achieve the objective of our processing as described above, we may transfer your personal data outside the European Economic Area (EEA). We transfer your personal data only to third parties outside the EEA when that country provides an adequate level of protection according to an adequacy decision issued by the European Commission or when the third party has agreed to provide appropriate safeguards that ensure your personal data is protected (within the limits permitted by the GDPR, eg by means of Standard Contractual Clauses). You can obtain more information and/or obtain a copy of those safeguards by emailing us at privacy@gfiainsurance.org.

We will take all steps reasonably necessary to ensure that your personal data is treated securely and in accordance with this Privacy Statement.

We reserve the right to disclose your personal data as required by law, or when we believe that disclosure is necessary to protect our rights and/or comply with a judicial proceeding, court order, request from a regulator or any other legal process served on us.

8. COOKIES

The Sites use Cookies. Cookies are small text files that are stored by your browser onto your computer or mobile device when you visit these Sites. The Sites use cookies that enable us to ensure the proper functioning of the website (functional cookies), as well as analytic cookies that collect aggregated usage data to improve the Sites (analytic cookies).

You can refuse the installation of cookies on your device. The ability to enable, disable and/or delete cookies can be completed in your browser. You can delete all cookies that are already on your device and you can set most browsers to prevent them from being placed. The settings are usually in the "options" or "preferences" menu of your browser. To understand them, the "Help" option in your internet browser or the following links may be helpful:

- [Cookie settings in Internet Explorer](#)
- [Cookie settings in Firefox](#)
- [Cookie settings in Chrome](#)
- [Cookie settings in Safari](#)

You can find more information about cookies at: www.allaboutcookies.org. Please note that turning off functional cookies might restrict your use of our website(s).

The Sites use the following types of cookies:

■ **Functional cookies**

- **Session cookies:** a session cookie is used each time you visit our Sites to give you a session ID. They link your actions on our Sites and each one will only last for a browser

session, at the end of which it will expire. After your visit to our Sites all session cookies are deleted.

- **Persistent cookies:** a persistent cookie allows the preferences or actions of the user across a site (or across different websites) to be remembered. It has a longer life than a session cookie and lasts for a period of time that varies from cookie to cookie. This type of cookie will not be deleted when you close your browser window and will be stored on your computer or mobile device. It will be activated every time you visit the website that created it.
- **First-party cookies:** a first-party cookie is a cookie set by us or any of our processors.
- **Third-party cookies:** a third-party persistent cookie is set by our service provider, CloudFlare, to identify trusted web traffic. It does not correspond to any user ID in the web application, nor does the cookie store any personally identifiable information.

For more information, please see: <https://support.cloudflare.com/hc/en-us/articles/200170156-What-does-the-CloudFlare-cfduid-cookie-do>

■ Analytic cookies

These cookies are used to gather statistics about your visit to the Sites to improve their performance and design (“web audience measuring”). They are first-party cookies, which means that we have complete control over the information collected through them.

These cookies collect information about the number of times that you visit the Sites, how long a visit takes, etc.

The analytical cookie we use is Google Analytics, which expires after two years and allows us to gather statistics about the web pages visited.

9. SECURITY OF YOUR PERSONAL DATA

We employ strict technical and organisational (security) measures to protect your personal data from access by unauthorised persons and against unlawful processing, accidental loss, destruction and damage both online and offline.

These measures include:

- training relevant staff to ensure they are aware of our privacy obligations when handling personal data
- administrative and technical controls to restrict access to personal data to GFIA secretariat staff members
- technological security measures, including firewalls, encryption and anti-virus software
- back-up systems
- login access blocks in case of loss or theft of devices
- physical security measures, such as staff security badges to access our premises

Although we use appropriate security measures once we have received your personal data, the transmission of data - especially over the internet (including by e-mail) - is never completely secure.

We endeavour to protect personal data, but we cannot guarantee the security of data transmitted to us or by us.

We limit access to your personal data to those who we believe reasonably need to come into contact with that information in order to carry out their tasks.

10. DATA RETENTION

We will retain your personal data for as long as:

- it is necessary to fulfil the purposes we collected it for, including the purposes for satisfying any legal, accounting or reporting requirements
- you have a role or function that is relevant to GFIA's daily business activities and mission
- your relationship with GFIA persists

Specifically, the IP that we collect when you visit our Sites is retained for 60 days.

For more information about the expiry dates of the cookies used on the Sites, please consult the cookie section.

11. AUTOMATED DECISION-MAKING

Automated decisions are defined as decisions about individuals that are based solely on the automated processing of personal data and that produce legal effects that significantly affect the individuals involved.

As a rule, your personal data will not be used for automated decision-making. We do not base any decisions about you solely on automated processing of your personal data.

12. HOW TO CONTACT US?

We hope that this Privacy Statement helps you understand, and feel more confident about, the way we process your personal data. If you have any further queries about this Privacy Statement and the Sites in general, please contact us:

- by e-mailing us at privacy@gfiainsurance.org or
- by calling us at +32 2 894 30 81.

13. CHANGES TO THIS PRIVACY STATEMENT

We may modify or amend this Privacy Statement in the future. Should this happen, the revised Privacy Statement will be posted on our extranet website, and you may also be notified by e-mail.