

# Privacy Regulations ICCA

May 2018

Data, including personal data plays an important role in the strategic Mission and day to day operations of ICCA. As ICCA is regarded as the global community and knowledge hub for the international association meetings market, and the long-established recorder of data on the trends and growth of the international association meetings market, we strive to collect and provide meaningful data to our membership and build valuable personal connections between members of the meetings community. This community consists of ICCA member organisations and non-ICCA member organisations, such as associations, press, non-member suppliers and other stakeholders in the international (association) meetings industry.

Our community relies on ICCA's careful and safe handling of data about meetings and the meetings industry, and particularly personal data. New technological developments, innovative facilities and globalisation impose different demands on the protection of data and privacy. Protecting privacy is complex, and is becoming more and more complex due to technological developments and new European legislation. That is why we think it is important to be transparent about the way in which we deal with personal data and to ensure that privacy policies protect the interests of all those whose data we process.

## 1. Legislation and important definitions

At present, each member state of the European Union has its own privacy legislation, based on the European directive of 1995. The 'Wet bescherming persoonsgegevens – Wbp'- regulates the legal framework for handling personal data in the Netherlands. The Wbp will expire on 25 May 2018 and its successor, the European Regulation, the General Data Protection Regulation (in the Netherlands the "Algemene Verordening Gegevensbescherming - AVG") will come into effect; The AVG builds on the Wbp and, among other things, reinforces and extends the privacy rights with more responsibilities for organisations.

The following terms are used in the AVG (Article 4, AVG):

Person concerned: The person to whom the personal data relates. The person concerned is the person whose data is processed. The person concerned is also called 'Data subject'.

Personal data: All data that concerns people and by which people can be identified as individuals. This not only concerns confidential data, such as a person's health, but any information that can be traced back to a specific person (for example, name, address, date of birth, etcetera). In addition to ordinary personal data, the law also defines special categories of personal data. These categories of data deal with sensitive topics, such as ethnic background, political

preferences, religious or philosophical beliefs, genetic or biometric data, but also a natural person's sexual orientation or his or her Citizen Service Number (BSN) are regarded as special categories of personal data.

Controller: A natural or legal person, public authority, agency, organisation or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data.

Processor: A natural or legal person, public authority, agency, organisation or other body which processes personal data on behalf of the controller.

Processing: Processing is everything you do with personal data, such as: recording, storing, collecting, joining, providing to another, and destroying.

Data Protection Impact Assessment (DPIA): With a data protection impact assessment, the effects and risks of new or existing processing operations are assessed in view of safeguarding privacy. This is often the case when new technologies are introduced for the processing of (personal) data.

## **2. Scope**

These regulations apply to all processing of personal data insofar as this is done by or on behalf of ICCA and its staff and deal with all processes, all parts, objects and data collections. However, whenever ICCA member organisations themselves process (personal) data, provided to them by ICCA, the member organisations themselves become responsible for the processing of this data and should be regarded as 'Controller' under the privacy legislation.

ICCA clearly communicates to its members that they are responsible for setting and managing their own privacy policies, including with regard to the processing of personal data, whatever the source.

## **3. Controller**

ICCA's Board of Directors and Management are responsible for the processing carried out by or on behalf of ICCA. The Board of Directors is required to officially sign off ICCA's Privacy Policy. ICCA Management is responsible for setting and communicating policies and regulations.

## **4. Processing**

According to Article 4, AVG, the processing of personal data is any action or set of actions with personal data, whether or not carried out via automated processes.

ICCA processes information for the following categories of data subjects:

**PA1 – ICCA Members:**

ordinary personal data, i.e name, business address details, business phone number, email address + job title of contact persons;  
special category of data: photo

**PA2 – ICCA non Members:**

ordinary personal data, i.e. name, address details, phone number, email address + job title of contact persons

**PA3 – Big Data:**

ordinary personal data, i.e. name person, name organisation, events where involved (Microsoft Academic public data).

**PA4 – Registration Data ICCA events:**

ordinary personal data: i.e name, address details, phone number, email address + job title of persons;  
special category of data: photo, diets + special medical needs.

**PA5 – ICCA Staff records:**

ordinary personal data: Name, address, phone number, email.  
special category of personal data: date of birth, BSN number, salary, pension, copy passport, appraisal records

**PA6 - ICCA Prospective employees:**

ordinary personal data: Name, address, phone number, email, age, previous employment history

For more detailed information regarding the above processing activities, please refer to the document:

[<link to 'detailed Privacy regulations document ICCA.xlsx'>](#)

**Purpose/goal/Rationale:**

In general, for ICCA's relationship with members, the primary rationale is "contract". For non-members, the primary rationale is "legitimate interest".

For information regarding the purposes/goals and legal grounds of the data processing, please also refer to the '[detailed Privacy regulations document ICCA.xlsx](#)' ( -see headings 'purpose/goal' and 'Rationale') :  
[<link to 'detailed Privacy regulations document ICCA.xlsx'>](#)

## **5. Transparency and Communication**

### **5.1. Obligation to provide Information (Article 13, 14 AVG) ):**

ICCA informs data subjects about the processing of their personal data whenever the data is directly obtained from the data subject itself (ref Article 13 AVG). As an example, whenever people fill in a form on our website/-portal a privacy statement will inform them as to what data is processed and with what purpose.

Where a member company/organisation provides ICCA with personal data on their staff, this is governed by the contract between ICCA and the member, and the member is responsible for informing their staff that their personal data has been provided to ICCA.

When the personal data has been obtained indirectly from public records or other sources, contacts will normally be contacted during the regular data verification processes that ICCA undertakes.

## **5.2. Deletion of data:**

ICCA only holds personal data for as long as is needed for the execution of its activities and tasks, and has clear policies for each category of personal data. If personal data is no longer needed for the appropriate function for which it is collected, it will be deleted in accordance with the relevant published timeframe.

For detailed information regarding storage periods and purposes, please consult the 'detailed Privacy regulations document ICCA'.

[<link to 'detailed Privacy regulations document ICCA.xlsx'>](#)

## **5.3 Rights of Data Subjects**

ICCA ensures that the rights of data subjects are fully respected. These rights are the following:

5.3.1. Right to information: Data subjects have the right to ask ICCA if their personal data are processed.

5.3.2. Right to request access to their personal data: The possibility to check if, and in what way, their personal data are processed.

5.3.3. Right to request rectification/correction: If it becomes clear that the data of the data subject is not correct, the person concerned can submit a request to ICCA to correct this.

5.3.4. Right to request erasure of personal data ('right to be forgotten'):

-if the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed;

-the data subject withdraws consent on which the processing is based and where there is no other legal ground for the processing;

5.3.5. Right to restriction of processing: There may be certain situations where the data subject can ask to temporarily not process (but 'lock') his or her personal data until a certain problem or objection has been resolved. ICCA is not aware of any type of processing/situations to which this restriction would be applicable.

5.3.6. Right to data portability: Personnel data will be provided to staff on leaving ICCA, on request. Other data is a copy of publicly available data, and portability is not normally relevant. Electronic versions of a person's records will be made available upon request.

5.3.7. Right to object: The data subject has the right to object, on grounds relating to his or her particular situation, at any time to processing of personal data concerning him or her which is based on point (e) or (f) of Article 6(1), AVG including profiling based on those provisions. The controller/ICCA shall no longer process the personal data unless the controller/ICCA demonstrates compelling legitimate grounds for the processing which override the interests, rights and freedoms of the data subject or for the establishment, exercise or defense of legal claims.

### **Additional rights**

Where personal data are processed for direct marketing purposes, the data subject shall have the right to object at any time to processing of personal data concerning him or her for such marketing, which includes profiling to the extent that it is related to such direct marketing.

(Article 21.3, AVG): Where the data subject objects to processing for direct marketing purposes, the personal data shall no longer be processed for such purposes.

Data subjects have the right for their contact details to be suppressed within the ICCA association database, but the data on the event itself cannot be deleted.

Data subjects have the right to request that ICCA provides detailed information on the data held on them. ICCA will provide detailed data in response to any such request no later than 30 days after the request is made. ICCA will correct any inaccurate personal data no later than 14 days after being notified of the inaccuracy.

## **6. Automated Processing (Geautomatiseerde verwerkingen)**

ICCA does not currently carry out any automated processing of personal data.

### **6.1 Profiling**

ICCA does not currently conduct automated profiling of data subjects.

### **6.2. Big Data and Tracking**

ICCA does not conduct Big Data tracking at the current time with relation to the personal contacts in its membership or on its databases.

ICCA maintains a database of association meetings, but this does not qualify as "Big Data".

ICCA provides a tool to members called "Big Data Search", which enables them to search the public database of Microsoft Academic for local contacts involved in specific association meetings. This tool does not qualify as "big data" as understood by this section of the regulations.

## **Data minimisation**

ICCA processes personal data that are minimally required for reaching the pre-determined goal. ICCA aims at keeping the processing of personal data to a minimum. Only the names of academics who have published a paper not longer than 10 years ago are selected.

## **Email-, website- and application tracking**

Tracking Technologies such as: cookies, tags and scripts are used by ICCA and our analytics and server providers (Microsoft ClickDimensions and Google Analytics) to track usage of our emails, websites and applications. These technologies are used to analyse trends, track users' movements and to gather demographic information about our users. We may receive reports based on the use of these technologies by such companies on an individual as well as aggregated basis.

## **7. Duties**

### **7.1. Registry of Activities**

ICCA maintains a record of processing activities which are undertaken under ICCA's responsibility. We call this record "A Registry of Activities.". ICCA keeps this record for the event that the Dutch Supervisory Authority ('De Autoriteit Persoonsgegevens') wishes to check our activities.

### **7.2. DPO**

ICCA has appointed a so called 'data protection officer' (DPO). This person is an ICCA staff member involved in matters which relate to the protection of personal data.

### **7.3 Data breach**

ICCA will report to the Dutch Supervisory Authority ('De Autoriteit Persoonsgegevens') whenever it becomes aware of a breach that involves personal data, in accordance with the statutory timing of such reports. In addition, ICCA will take any other action that it deems necessary to resolve the issue and fulfil its legal obligations.

## **8. Social Media Protocol**

ICCA uses social media to engage and interact with its target groups. Consent and data use of personal information shared on social media is covered by the terms and conditions and privacy notices of the social media software tools.

ICCA does not store social media-derived personal data out of the tools in its CRM system.

ICCA does store social media accounts of ICCA members in the CRM, if submitted by the ICCA member and/or if this account information is publicly available. Social media accounts of ICCA members are published in ICCA' s membership directory with the consent of ICCA members.

### **8.1 How to deal with personal data**

ICCA does not process personal data derived from social media profiles; only links to profiles are processed, where these are shared by contacts.

### **8.2. Photography and video material**

Pictures taken at ICCA Events (including ICCA activities at tradeshows) are published on social media and could be reproduced in ICCA educational, news or promotional material, whether in print, electronic or other media, including the ICCA websites.

ICCA reserves the right to crop, splice, treat and edit any imagery or photographs taken at ICCA events. The Participant waives the right to inspect or approve the finished product, including written or electronic copy. Additionally, all rights to royalties or other compensation arising or related to use of the name, photograph or biography are waived by the Participant, Participant's agents or employees. All photographs and video materials taken at ICCA events become the property of ICCA. ICCA related material may not be photographed, drawn, copied or reproduced without ICCA's written permission.

### **8.3. Separation of business and private data**

ICCA only processes business-related personal data. There is no private data collected, so no requirement for separation of the two categories.

## **9. Intranet protocol**

ICCA's internal communication processes are subject to guidelines set out in the House Rules, which are in compliance with GDPR requirements.