



ELF DATA PROCESSING POLICY

The European Lawyers Foundation (ELF) holds data only for the purpose of carrying out its activities. We do not share personal data with any third party. We are a not-for-profit organization (as recognized by The Netherlands Tax Authorities), and we do not use any data for commercial purposes.

Purpose of data processing: We only hold data that is relevant for our projects (ie: data of participants who take part in our activities) or for our organization (data of employees and of members of ELF bodies).

Types of personal data: in almost all cases, the data is simply the name, surnames and e-mail addresses of the people concerned. In some cases, it may also be a city or even an address if a participant sends us an e-mail which contains this data in her/his signature, and bank account details when we have to reimburse people for their participation in our project activities. This also applies to members of our Boards, except for the members of the Board of Directors where, due to legal requirements (ie: their registration at the Chamber of Commerce in The Hague) we need to provide copies of their passports (which includes data such as date and place of birth) which we hold as scanned copies on our secure server. For employees, we hold their name, surnames, address and place and date of birth. Other data may be held in relation to the payment of social security obligations.

Category of data subject concerned: participants in our projects (including speakers), employees, consultant(s) and members of ELF boards.

Category of recipients: government authorities (including tax authorities), project donors for justification of costs' (including the European Union), those responsible for preparing employees' payslips.

Storage periods: since much of our data is related to projects which are funded with public funds, we are legally obliged to keep the data for at least 5 years following the end of the project, as this is the time in which the donors (ie: organizations which granted the funds) may decide to carry out an audit. This affects participants and also employees, since all ELF employees are partially or totally funded by EU projects. For the members of the ELF Board, their data (name, surname and country they represent) are deleted from our website as soon as they end their mandate.

European Lawyers Foundation

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Technical and organizational security measures to protect the personal data: all information that is stored electronically is stored on our own server which has an appropriate level of protection. All our computers are also secured (with Avast Internet Security software). The information that we hold in paper form is secured in ELF's offices, which are always closed by key outside working hours. Our offices are located in a building that is also closed to people from the outside by one door (and two doors during the weekends).

Recipients outside the EU: some of the data may be transferred outside the EU (mainly in these cases to the United States and the United Kingdom). This is undertaken for two purposes:

- a) Information may need to be sent to institutional funders that finance some of our activities as they request such information for auditing purposes.
- b) Information is sent to entities such as processors, technical solution vendors, etc., in the framework of our activities. This includes companies which provide technical solutions such as Zoom.