

# Privacy Statement Full Circle

## Short

Full Circle located at Dreve du Pressoir 38, 1190, Brussels is responsible for the processing of your personal data, via its website [www.fullcircle.eu](http://www.fullcircle.eu).

Full Circle processes data from the visitors and/or users for the following **purposes**:

- Executing and offering the services of Full Circle;
  - Member administration;
  - Program and event registration;
  - Statistical research;
  - Direct marketing;
  - Collecting funds;
- Management of requests for information;
- Improvement of the operation of Full Circle and the website;
- To provide all other services you have requested;
- Compliance with applicable legislation.

You can always request **access** to - and **rectification** or **erasure** of personal data or to **restrict** the processing; as well as the right to **object** to processing, the right to data **portability** and the right to **withdraw** your consent at all times.

Personal data are **transferred** to following recipients:

- Processors that provide statistical research and analysis;
- Processors who provide hosting of this website and related databases;
- Processors who provide payment processing services;
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## 1. Definitions

In this Privacy Statement the following terms are defined as follows:

- A. Full Circle: Full Circle Asbl is registered in Belgium as a an ASBL with the enterprise number 0535.836.314, and with its registered offices at Dreve du Pressoir 38, 1190, Brussels
- B. Website: the website of Full Circle, [www.fullcircle.eu](http://www.fullcircle.eu), and derivative websites and subdomains developed and administered by Full Circle
- C. Personal data: Any information relating to an identified or identifiable natural person.
- D. Processing: 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, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction;

## 2. Processing of personal data

This Privacy Statement is applicable to all processing activities undertaken by Full Circle, unless further transparency is provided, through e.g. disclaimers, electronic means or orally.

Full Circle attaches great importance to respecting and protecting your privacy and the confidentiality and safety of your personal data.

By accessing this Website and/or disclosing your personal data you expressly consent to the processing of personal data in accordance with the conditions set out in this Privacy Statement.

The Personal data is processed until May 25, 2018 in accordance with the Act of December 8, 1992 concerning the protection of privacy with regard to the processing of personal data (hereinafter the 'Act of December 8, 1992'), which implemented the EU Data Protection Directive 95/46 EC; as off and including May 25, 2018 in accordance with Regulation (EU) 2016/679 (hereinafter 'GDPR'). These regulations are hereinafter commonly referred to as 'Data Protection Regulation'.

In this regard Full Circle acts as the data controller for the purposes of this Privacy Statement, meaning that it determines the purposes and means of processing of personal data.

### 3. What information

Full Circle may process personal data via its website, by including without limitation, the contact form, newsletter form and cookies. This personal data that is actually processed may depend upon the requested services and purposes of said processing.

Full Circle may process the following personal data pertaining to website **visitors**:

- Information about your PC or mobile device and your visits and use of the website, including your IP address, operating system, browser type and geographical location;
- Personal contact information that you provide by using the contact form or newsletter form, such as your first name, last name, email address and newsletter subscription preferences;
- Any other information that you choose to provide, by any means.

Full Circle may process the following personal data of its (prospective) **members and subscribers**:

- Personal contact information that is provided to us, such as your first name, last name, email address, telephone number, mobile number, payment information;
- Financial identification data such as bank account number in order to e.g. process membership fees;
- Occupation and employment data;
- Direct marketing preferences;
- Membership details;
- Survey data;
- Any other information that you choose to provide, by any means.

Full Circle may process the following personal data of **survey participants**:

- Personal contact information that is provided to us, such as your first name, last name, email address, telephone number, mobile number, payment information;
- Any other information required in the survey for research purposes.

In addition, Full Circle may process personal data that it has received from third parties relating to you, i.e. when a colleague or your organization signs you up for our membership.

The fields of relevant forms denoted with (\*) are strictly necessary for the purposes of processing, if one or more of these fields are not completed the form will not be executed. Other fields can be completed to better facilitate the provision of services by Full Circle.

## 4. Purposes of processing

Full Circle collects and processes personal data for one or multiple of following purposes:

Purposes	Legal basis
Member administration;	Performance of a contract
Program and event registration;	Performance of a contract
Direct marketing;	Consent/ legitimate interests
Collecting funds;	Performance of a contract

If Full Circle wishes to use personal data for a new purpose Full Circle will request your consent prior to this new use, unless such processing is required by union or national law.

When the processing is based on your consent, you have the right to withdraw consent at any time, without affecting the lawfulness of processing based on consent before its withdrawal.

## 5. Transfers of personal data

We do not give, rent or sell your personal data to third parties to use for their own purposes.

Within Full Circle, the data is passed on only to employees on a "need-to-know" basis.

Full Circle can make use of data processors to process your personal data. Data processors are natural or legal persons, public authorities, agencies or other bodies which process personal data on behalf of Full Circle.

Full Circle can transfer the personal data to the following (categories of) recipients:

- Processors that provide statistical research and analysis;
- Processors who provide hosting of this website and related databases;
- Processors who provide payment processing services;

Personal data may be processed by these recipients outside the European Economic Area, Full Circle will make sure appropriate safeguards are implemented. You can obtain a copy of the guaranteed measures upon written request.

Full Circle may alter its corporate structure by changing legal form, merger, acquisitions and sale of affiliates, in such transactions Personal data will be passed on in accordance with this Privacy Statement and applicable data protection law.

## 6. Personal data storage duration

Full Circle will store the personal data for following periods:

Personal data	Period
Identification data	Start date of tracking + 5 years thereafter
Account data	Duration of Full Circle membership + 5 years thereafter
Electronic identification data	For a period of 5 years after receipt thereof.
Financial identification data and financial	For a period of 7 years after receipt thereof.

transactions	
	Duration of ISN membership + 5 years thereafter
Membership details	Duration of Full Circle membership + 5 years thereafter
Personal details	Duration of Full Circle membership + 5 years thereafter
Survey data	For 1 year after receipt thereof for evaluation services and thereafter for the duration of the ISN membership + 5 years thereafter
Any information the subjects wish to share	Duration of Full Circle membership + 5 years thereafter

## 7. Your rights

You are entitled to request from us access to and rectification or erasure of personal data or restriction of processing or to object to processing as well as the right to data portability. For this purpose you should send your dated and signed request to Full Circle, Dreve du Pressoir 38, 1190, Brussels enclosing a copy of your identity card<sup>1</sup>, or you can contact Full Circle via email at [gdpr@fullcircle.eu](mailto:gdpr@fullcircle.eu) and finish your email with an electronic signature.

Within one month of the submission of the request, you will be informed of the follow-up of your query.

You have the right to withdraw your consent for a particular processing activity at any time, without this affecting the lawfulness of the processing on the basis of the consent before its withdrawal. In case you have given your permission to receive newsletters and advertising, you can withdraw it by changing your account settings or using the "unsubscribe / unsubscribe" link in the communication.

Finally, you have at all times the right to submit a complaint to the supervisory authority.

You have the right to obtain human intervention on the part of Full Circle, to express your point of view and to contest the decision.

## 8. Anonymous data

Full Circle is permitted to collect non-personal and anonymous data when the website is visited and anonymize personal data. This data does not allow Full Circle to proceed to identify an individual person and this data can be shared with third parties, including for statistical purposes.

## 9. Cookies

This website makes use of cookies to enhance the browsing experience. For more information regarding the use of cookies, please refer to our [Cookie Statement](#).

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<sup>1</sup> Please anonymize the following fields on the copy of your identity card: card number and national register number.

## **10. Changes**

Full Circle reserves the right to continually update this Privacy Statement.

*This Privacy Statement was last updated: 16 May 2018.*

## **11. Miscellaneous**

If any of the provisions of this Privacy Statement would be wholly or partially annulled by a binding decision, this shall have no effect whatsoever on the other provisions of this Privacy Statement. Full Circle is entitled to modify or replace such a provision by another provision which, within legal limits, has the same effect.

The failure of Full Circle to demand strict compliance with the provisions of this Privacy Statement shall not be construed as a waiver or rejection thereof.

## **12. Applicable law**

By visiting the website and thus expressly accepting this Privacy Statement and the conditions therein, you agree that any dispute or claim relating to this Privacy Statement and the processing of personal data shall be governed by Belgian law and the exclusive jurisdiction of the courts of Brussels (Belgium).

## **13. Contact**

If you have any questions or comments regarding the policy concerning the processing of personal data after reading this Privacy Statement, please contact the contact person at the address Dreve du Pressoir 38, 1190, Brussels or you can contact Full Circle via email at [gdpr@fullcircle.eu](mailto:gdpr@fullcircle.eu).

Please send requests for additional general information concerning the protection of personal privacy to the Belgian Data Protection Authority at this address, Rue de la Presse 35 B-1000 Brussels telephone number: +32 (0)2 274 48 00 or via email at [commission@privacycommission.be](mailto:commission@privacycommission.be) ([www.privacycommission.be](http://www.privacycommission.be)).