**Privacy notice WSAC Ibex**

WSAC Ibex values the protection of your personal data. In this privacy notice we want to provide clear and transparent information about how we process personal data.

We do everything we can to guarantee your privacy, and therefore handle your personal data carefully. In all instances, WSAC Ibex abides by the relevant legislation, among which is the General Data Protection Regulation. This entails that we:

* process your personal data in accordance with the purpose for which they were collected. These purposes and types of personal data are described in this privacy notice;
* limit the processing of your personal data to just the data that are minimally necessary for the purposes for which they are being used;
* ask for your explicit permission if we need it for processing your personal data;
* have taken appropriate technical and organisational measures to protect your personal data;
* will not share personal data with other parties, unless this is necessary for the purposes for which they were collected;
* are aware of your rights concerning your personal data, will inform you about these and respect them.

As WSAC Ibex, we are responsible for the processing of your personal data. If, after reading our Privacy notice, or in general, you have any questions or comments, you can contact us via the contact details at the bottom of this document.

1. **Processing by WSAC Ibex**

We process the data you provide us with internally to enable our services. Members of the board and committees that have access to personal data need to sign a Non-Disclosure Agreement upon joining said board or relevant committee. In this agreement, the necessary rules and guidelines are established to ensure the safety of your personal data.

A specific explanation of the processing of your data is given below per personal data type. This only includes processing within WSAC Ibex.

**Name and email address**

Purpose: membership administration, contact, providing information (newsletter)

Retention period: removed within 2 years after termination of membership

Storage location: website, Google account board

Who has access: board, website committee, education committee

Legal basis: performance of membership contract (Article 6 (1)(b) GDPR)

**Student number and WUR-card barcode**

Purpose: registration with Thymos and checking of sports rights

Retention period: removed within 1 year after termination of membership

Storage location: website

Who has access: board, website committee

Legal basis: performance of membership contract (Article 6 (1)(b) GDPR)

**Phone number**

Purpose: communication, at least in emergency situations during a climbing weekend

Retention period: removed within 1 year after termination of membership

Storage location: website

Who has access: board, website committee, education committee

Legal basis: consent, given with providing the data (Article 6 (1)(a) GDPR)

**Address**

Purpose: contact (association magazine)

Retention period: removed within 1 year after termination of membership

Storage location: website

Who has access: board, website committee, editors committee (association magazine)

Legal basis: consent, given with providing the data (Article 6 (1)(a) GDPR)

**Contact details ICE (In Case of Emergency)** (name, email address, phone number, address)

Purpose: contacting loved ones in case of an accident during a climbing weekend

Retention period: removed within 1 year after termination of membership

Storage location: website

Who has access: board, website committee, supervisors climbing weekend/trip

Legal basis: consent, given with providing the data (Article 6 (1)(a) GDPR)

**Bank details** (account number, direct debit form)

Purpose: payment for membership and participating in activities

Retention period: removed within 2 years after termination of membership

Storage location: website, bookkeeping program and physical bookkeeping treasurer

Who has access: board, website committee, kascie (checking finances)

Legal basis: performance of membership contract (Article 6 (1)(b) GDPR)

**Payment data**

Purpose: keeping bookkeeping correct

Retention period: unlimited, pseudonymised within 2 years after termination of membership

Storage location: bookkeeping program treasurer, Google account board

Who has access: board, kascie (checking finances)

Legal basis: legitimate interests (Article 6 (1)(f) GDPR)

**Qualifications regarding climbing skills**

Purpose: protecting safety of participants of climbing activities

Retention period: removed within 2 years after termination of membership

Storage location: website, Google account board, hard drive secretary

Who has access: board, website committee, education committee

Legal basis: legitimate interests (Article 6 (1)(f) GDPR)

**Pictures archive** (pictures competitions/activities)

Purpose: archive, make website look nice (only logged in part)

Retention period: unlimited

Storage location: website, hard drive in the hok

Who has access: members of WSAC Ibex

Legal basis: consent, given with participating in activity (Article 6 (1)(f) GDPR)

**Pictures public** (pictures competitions/activities)

Purpose: marketing, make website look nice (public part)

Retention period: unlimited

Storage location: website

Who has access: public

Legal basis: consent, express written permission (Article 6 (1)(f) GDPR)

**Medical data** (use of medication, allergies, etc.)

Purpose: take risks\* into account

Retention period: removed within 1 week after completion climbing weekend/trip

Storage location: website, printout for supervisors climbing weekend/trip

Who has access: board, supervisors climbing weekend/trip

Legal basis: consent, given with providing the data (Article 6 (1)(a) GDPR)

*\*risks in general (allergies, bad health, etc.) or in case of an accident (e.g. correct treatment in combination with regular use of medication), relevant to supervisors of climbing weekend/trip*

**Dietary preference**

Purpose: adjusting menu at activities

Retention period: removed within 2 years after termination of membership

Storage location: website, Google account relevant committees (who organise the activity)

Who has access: board, relevant committees

Legal basis: consent, given with providing the data (Article 6 (1)(a) GDPR)

**Gender, nationality, date of birth**

Purpose: analysis of members composition of WSAC Ibex\*

Retention period: removed within 2 years after termination of membership

Storage location: website, Google account relevant committees (who organise the activity)

Who has access: board, website committee

Legal basis: consent, given with providing the data (Article 6 (1)(a) GDPR)

*\*determine to what extent different groups are represented to, if necessary, show and counteract that certain groups are favoured*

**Other data processing**

When we want to process other personal data than those mentioned above, or when we want to process the personal data mentioned above for another purpose than described above, we will ask for your written permission beforehand.

1. **Providing to third parties**

We can share the data you provide with third parties if this is necessary for the purpose for which the data were provided. We only share your personal data with third parties with whom we have concluded a Data Processing Agreement, except for the Kamer van Koophandel (dutch chamber of commerce). With these parties (processors) we make the necessary deals to ensure the protection of your personal data. Provision of data to the Kamer van Koophandel is regulated by the Handelsregisterwet (Dutch business register law). Furthermore, we will only provide your data to other parties if this is legal.

**CustomPixels**

WSAC Ibex purchases web hosting services from CustomPixels. CustomPixels processes personal data on our behalf and does not use your data for its own purposes. This concerns all personal data you fill in on your account on our website. This party can gather metadata about the use of the services for its own purposes. These are not personal data. To this end, our website uses cookies (7). CustomPixels has taken appropriate technical and organisational measures to prevent loss and unauthorised use of your personal data. Based on the agreement, CustomPixels is required to maintain confidentiality.

**MailChimp**

We send our newsletters using MailChimp and share your name and email address with MailChimp. MailChimp will never use your name and email address for its own purposes. At the bottom of each email that was sent automatically via MailChimp, you find the ‘unsubscribe’ link. If you click on that, you will no longer receive our newsletter. Your personal data are stored safely by MailChimp. MailChimp uses cookies and other internet technologies that show us whether the emails are opened and read. MailChimp reserves the right to use your metadata to further improve the service and to share them with third parties for that purpose.

**Mountain Network Arnhem**

We share our members list with Mountain Network Arnhem to determine who is entitled to the discount that applies to WSAC Ibex members. This list only contains full names. Mountain Network Arnhem does not use your data for its own purposes. If you object to this, you can contact us via the contact details at the bottom of this document.

**Avalon fitcentre**

We share our members list with Avalon fitcentre to determine who is entitled to the discount that applies to WSAC Ibex members. This list only contains full names. Avalon fitcentre does not use your data for its own purposes. If you object to this, you can contact us via the contact details at the bottom of this document.

**NSAC (Nederlandse Studenten Alpen Club)**

We share our members list with the NSAC to determine who is entitled to the course offers that apply to SAC members and to enable the emergency procedure (summer period). This list only contains full names. The NSAC does not use your data for its own purposes. If you object to this, you can contact us via the contact details at the bottom of this document.

**Kamer van Koophandel (dutch chamber of commerce)**

WSAC Ibex and its board members are registered with the Kamer van Koophandel. If you do not hold a position on the board, your personal data will not be shared with the Kamer van Koophandel. Aspiring board members are informed about the registration requirement and consent with providing their personal data for registration with the Kamer van Koophandel.

**Other third parties**

When Ibex cooperates with a third party for a specific activity and shares personal data with this party to enable the activity, WSAC Ibex will conclude a Data Processing Agreement with this party. Members are notified of this at the subscription for the activity. With the completion of the subscription, members consent to this data sharing.

1. **Retention period**

WSAC Ibex does not keep personal data longer than necessary for the purpose for which they were provided or than is legally allowed.

1. **Security**

We have taken appropriate technical and organisational measures to protect your personal data against unauthorised and unlawful processing.

1. **Rights regarding your data**

* You have the right of access to your personal data (article 15 GDPR). If you want to know which of your personal data we process, you can submit a written request to obtain access.
* You have the right to rectification of your personal data (article 16 GDPR). If your data are incorrect, incomplete or irrelevant, you can submit a request to have your data corrected or completed. In many situations, you can also correct your data on your account on our website.
* You have the right to erasure (‘right to be forgotten’) (article 17 GDPR). In certain cases, you can request that we remove the data we received from you.
* You have the right to restriction of processing (article 18 GDPR). In certain cases, we are not allowed to remove your data yet, but you can ask us not to process them anymore, for example when they could be incorrect but this needs to be checked first.
* You have the right to data portability (article 20 GDPR). You have the right to have your data transmitted from us to you or, in your name, directly to another party.
* You have the right to object (article 21 GDPR). You can object to the processing of your personal data (or a part of them) by us or one of our processors. We will then cease processing your data.

We can ask you to identify yourself before we can obey the requests mentioned before. If we do continue to process your data because (urgent) justified reasons for that outweigh the rights mentioned above, we will inform you about this beforehand.

We process some of your personal data based on your consent (1). You always have the right to retract this consent.

1. **Complaints**

If you have a complaint about the processing of your personal data, we ask you to contact us immediately about this via the contact details below. We would like to discuss the possible solutions with you right away. If we do not come to an agreement, we would naturally find this very regrettable. You always have the right to submit a complaint with the Autoriteit Persoonsgegevens. This is the supervisory authority in the field of privacy protection.

1. **Cookies**

Our website uses cookies. More about the cookie policy of WSAC Ibex can be found below.

**What are cookies?**

Cookies are small text files that are saved on your computer by a website you visit. Thereby, your computer is recognisable during your visit.

**3 types of cookies**

* Necessary cookies. Certain cookies are required to retain settings or preferences during a visit to the website or until the next visit. Suppose you do not want cookies from a certain website. That website can ‘remember’ this by placing a cookie. Without cookies, you are continuously asked the same questions.
* Cookies for research into website usage. There are cookies which tell the website which pages you access, in what order and how long. With that information, web statistics can be made which help to better adjust the website to the visitors. Comparable are cookies to, for example, hold surveys.
* Cookies of websites of third parties. At certain parts of a website, websites of third parties place cookies. This concerns practical extras: such as a Google map with interactive directions. This type of cookie is not used by WSAC Ibex.

**No personal data**

The cookies WSAC Ibex uses do not contain personal data. Such cookies can therefore not be used to identify you. For this, additional information would be needed: for example a combination of type 3 cookies with your login details for websites of third parties (those login details often can lead to your person). Without this additional information, cookies do not pose a threat to your privacy.

**Which cookies does WSAC Ibex place?**

Cookies for statistics and research

WSAC Ibex uses cookies for web statistics and research to gain insight into how visitors use the website. This information helps us to improve the website. These ‘analytics cookies’ contain a (unique) number. They do not contain personal data. WSAC Ibex cannot use these cookies to recognise you personally. The cookies also cannot be used to recognise you on other websites. The gathered anonymous data will not be used for other purposes than to improve the website and they will not be available to third parties, with the exception of CustomPixels.

**Receive no cookies**

Do you no longer want to receive cookies? Than you can change the settings of your internet browser for that. The website waarschuwingsdienst.nl provides information about the most frequently used browsers.

1. **Questions**

If you have any questions or comments in response to our Privacy notice, please do contact us!

1. **Contact details**

WSAC Ibex has no independent Data Protection Officer. Our privacy policy is checked by the Data Protection Commissioner, a position held by the secretary. The secretary and the board as a whole can be contacted via the mailing and email address below.

WSAC Ibex

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Nederland

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