

## PRIVACY POLICY

The French non-profit organisation "EUROPEAN NETWORK FOR WOMEN IN LEADERSHIP", whose office is located at 21 bis rue du Simplon, 75018 Paris, registered under the SIRET number 524 532 553 00038 ("**WIL**", "**we**", "**ours**") process personal data of:

- its members and former members;
- participants and former participants of the Women Talent Pool Programme;
- contacts / prospects;
- speakers at events / coach;
- job applicants
- website visitors; and
- providers/partners.

(hereinafter together referred to as "**you**", "**your**").

This privacy policy explains when, why and how we collect, use and otherwise process your personal data.

Please note that we process personal data of visitors of our website ([www.wileurope.org](http://www.wileurope.org)) through the use of cookies. To learn more about our use of cookies, please read our cookie policy <https://www.wileurope.org/cookiepolicy>.

### A. PERSONAL DATA COLLECTED AND PURPOSES OF THE PROCESSING

We collect personal data for the following purposes:

| Data Subject category | Type of information  | Purposes of processing  | Legal basis of processing   |
|-----------------------|--|---|---|
| <b>WIL Members</b>    | <ul style="list-style-type: none"> <li>• name</li> <li>• address (professional and/or personal)</li> <li>• e-mail address (professional and/or personal)</li> <li>• telephone numbers (professional and/or personal)</li> <li>• picture</li> <li>• the company you work for</li> <li>• the department in which you work</li> <li>• job title</li> <li>• nationality</li> <li>• the city you are based in</li> <li>• the country you are based in</li> <li>• skype ID</li> <li>• twitter account</li> </ul> | <ul style="list-style-type: none"> <li>• management of your membership</li> <li>• organisation of events</li> <li>• organisation of a mentoring program (the "<b>Women Talent Pool Programme</b>")</li> <li>• sending of emails for the promotion of WIL</li> <li>• sending of emails for the promotion of other charitable initiatives</li> <li>• subscription fee management</li> <li>• respond to members' requests</li> <li>• management of claims</li> </ul> | <ul style="list-style-type: none"> <li>• contract concluded with us (WIL subscription form)</li> <li>• our legitimate interest</li> </ul> |

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|--|--|---|--|
|  | <ul style="list-style-type: none"> <li>• dietary habits</li> </ul>   |   |  |
| <b>Participants of the Women Talent Pool Programme</b>                           | <ul style="list-style-type: none"> <li>• name</li> <li>• address (professional and/or personal)</li> <li>• e-mail address (professional and/or personal)</li> <li>• telephone numbers (professional and/or personal)</li> <li>• picture</li> <li>• the company you work for</li> <li>• the department in which you work</li> <li>• job title</li> <li>• nationality</li> <li>• the city you are based in</li> <li>• the country you are based in</li> <li>• skype ID</li> <li>• twitter account</li> <li>• dietary habits</li> </ul> | <ul style="list-style-type: none"> <li>• management of your participation of the Women Talent Pool Programme</li> <li>• organisation of events</li> <li>• organisation of the Women Talent Pool Programme</li> <li>• sending of emails for the promotion of WIL</li> <li>• sending of emails for the promotion of other charitable initiatives</li> <li>• respond to participant' requests</li> <li>• management of claims</li> </ul> | <ul style="list-style-type: none"> <li>• contract concluded with us (participation form)</li> <li>• our legitimate interest</li> </ul> |
| <b>Former WIL members/former participants of the Women Talent Pool Programme</b> | <ul style="list-style-type: none"> <li>• name</li> <li>• address (professional and/or personal)</li> <li>• e-mail address (professional and/or personal)</li> <li>• telephone numbers (professional and/or personal)</li> <li>• picture</li> <li>• the company you work for</li> <li>• the department in which you work</li> <li>• job title</li> <li>• nationality</li> <li>• the city you are based in</li> <li>• the country you are based in</li> <li>• skype ID</li> </ul>  | <ul style="list-style-type: none"> <li>• organisation of events</li> <li>• organisation of an alumni program</li> <li>• sending of emails for the promotion of the WIL</li> <li>• sending of emails for the promotion of other charitable initiatives</li> <li>• respond to requests</li> <li>• management of claims</li> </ul>   | <ul style="list-style-type: none"> <li>• our legitimate interest</li> </ul>  |

|   |  |  |   |
|---|--|--|---|
|   | <ul style="list-style-type: none"> <li>• twitter account</li> <li>• dietary habits</li> </ul>  |  |   |
| <b>Contacts / Prospects</b>                           | <ul style="list-style-type: none"> <li>• name</li> <li>• address (professional and/or personal)</li> <li>• e-mail address (professional and/or personal)</li> <li>• telephone numbers (professional and/or personal)</li> <li>• the company you work for</li> <li>• the department in which you work</li> <li>• job title</li> <li>• nationality</li> <li>• the city you are based in</li> <li>• the country you are based in</li> </ul> | <ul style="list-style-type: none"> <li>• organisation of events</li> <li>• sending of emails for the promotion of the WIL</li> <li>• sending of emails for the promotion of other charitable initiatives</li> <li>• respond to requests</li> <li>• management of claims</li> </ul> | <ul style="list-style-type: none"> <li>• our legitimate interest</li> </ul>                                       |
| <b>Providers / partners</b>                           | <ul style="list-style-type: none"> <li>• name</li> <li>• email address (professional)</li> <li>• telephone numbers (professional)</li> </ul>   | <ul style="list-style-type: none"> <li>• management of the commercial relationship (request of services, management of payments, administrative and financial follow-up ...)</li> </ul>  | <ul style="list-style-type: none"> <li>• contract concluded with us</li> <li>• our legitimate interest</li> </ul> |
| <b>Speakers at events organized by the WIL/ coach</b> | <ul style="list-style-type: none"> <li>• name</li> <li>• email address (professional)</li> <li>• telephone numbers (professional)</li> <li>• the company you work for</li> <li>• the department in which you work</li> <li>• job title</li> <li>• nationality</li> <li>• the city you are based in</li> <li>• the country you are based in</li> <li>• skype ID</li> </ul>  | <ul style="list-style-type: none"> <li>• organisation of events</li> </ul>   | <ul style="list-style-type: none"> <li>• our legitimate interest</li> </ul>                                       |

|                              |  |   |   |
|------------------------------|--|---|---|
|                              | <ul style="list-style-type: none"> <li>• twitter account</li> <li>• dietary habits</li> </ul>  |   |   |
| <b>Users of our websites</b> | <ul style="list-style-type: none"> <li>• connection data collected through the use of cookies (IP address, geographical location, browser type and version, operating system, information about your visits to and use of our websites)</li> </ul> | <ul style="list-style-type: none"> <li>• administering our websites</li> <li>• personalizing our websites</li> <li>• enabling your use of the services available on our websites</li> </ul> | <ul style="list-style-type: none"> <li>• to comply with our legal and regulatory obligations</li> <li>• your consent (cookie banner)</li> </ul> |
| <b>Job applicants</b>        | <ul style="list-style-type: none"> <li>• name</li> <li>• email address</li> <li>• phone number</li> <li>• education</li> <li>• CV</li> <li>• Information collected during interviews</li> </ul>  | <ul style="list-style-type: none"> <li>• Hiring decision</li> </ul>   | <ul style="list-style-type: none"> <li>• our legitimate interest</li> </ul>   |

We believe that the risk associated with the personal data we process on the basis of our legitimate interests is not excessive or too intrusive. In particular, we have put in place measures to protect your rights by applying appropriate retention periods and ensuring appropriate security controls.

If you choose not to provide the personal data we request, we may not be able to provide you with the services you have requested or to fulfil the purposes for which we have requested the personal data.

## **B. RECIPIENTS OF YOUR PERSONAL DATA**

We may share your personal data with the following third parties:

- Companies that provide us with products and services, such as:
  - marketing and advertising services (e.g. marketing agencies, interactive agencies, e-mailing solution providers);
  - hosting and maintenance services;
  - catering services;
  - room rental services.

We have carefully selected these service providers and taken measures to ensure that your personal data is adequately protected. All our service providers are required by a written contract to process the personal data provided to them only for the purpose of providing us with a specific service and to maintain appropriate security measures to protect your personal data.

- Judicial authorities, public administration and any other third party if we are under an obligation to disclose or share your personal data in order to comply with any legal obligation, to protect rights, property and/or safety of our company or our employees;
- Our accountants, auditors, lawyers and other advisors.

## C. INTERNATIONAL TRANSFERS OF PERSONAL DATA

We use the services of Wild Apricot Inc. a company located in Canada, to manage our website and membership. Please note that the European Commission has recognized Canada (commercial organizations) as providing an adequate level of data protection.

Wild Apricot Inc. stores personal data on Amazon Web Services servers located in the United States. AWS participates in the EU-U.S. Privacy Shield principles and the Swiss-U.S. Privacy Shield principles regarding the collection, use, sharing and retention of personal data from the European Economic Area and Switzerland, as described in the EU-U.S. Privacy Shield certifications and Swiss-U.S. Privacy Shield certifications of AWS. [Click here](#) for more information concerning such certifications of AWS

## D. RETENTION PERIOD

We do not keep your personal data beyond the time necessary to achieve the purposes for which the data are processed.

## E. SECURITY OF YOUR PERSONAL DATA

We have adopted physical, electronic and administrative security measures including the use of extended firewalls and passwords to secure access to personal data. In addition, we limit access to personal data to employees who need to know this information in order to manage, develop or improve our services.

## F. YOUR RIGHTS

As a data subject, you have different rights. These rights are not absolute and each of these rights is subject to certain conditions in accordance with the General Data Protection Regulation No. 2016/679 and applicable national laws.

- **The right of access** – you have the right to obtain from us confirmation as to whether or not your personal data is being processed by us, and about certain other information (similar to that provided in this privacy policy) about how it is used. You also have the right to access your personal data, by requesting a copy of the personal data concerning you. This is so you are aware and can check that we are using your information in accordance with data protection law. We can refuse to provide information where to do so may reveal personal data about another person or would otherwise negatively impact another person's rights.
- **The right to rectification** – you can ask us to take measures to correct your personal data if it is inaccurate or incomplete (e.g., if we have the wrong name or address for you).
- **The right to erasure** – this is also known as the ‘right to be forgotten’ and, in simple terms, enables you to request the deletion or removal of your personal data where, for example, there is no compelling reason for us to keep using it or its use is unlawful. This is however not a general right to erasure and there are some exceptions, e.g. where we need to use the information in defence of a legal claim or to be able to comply with a legal obligation.
- **The right to restrict processing** – you have the right to ‘block’ or suppress the further use of your personal data when we are assessing a request for rectification or as an alternative to erasure. When processing is restricted, we can still store your personal data, but may not use it further.
- **The right to data portability** – you have the right to obtain and reuse certain personal data for your own purposes across different organisations (being separate data controllers). This only applies to your personal data that you have provided to us that we are processing with your consent and for the purposes of contract fulfilment, which is being processed by automated means. In such a case we will provide you with a copy of your data in a structured, commonly

used and machine-readable format or (where technically feasible) we may transmit your data directly to a separate data controller.

- **The right to object** – you have the right to object to certain types of processing, on grounds relating to your particular situation, at any time insofar as that processing takes place for the purposes of legitimate interests pursued by the WIL. We will be allowed to continue to process the personal data if we can demonstrate compelling legitimate grounds for the processing that override your interests, rights and freedoms or we need this for the establishment, exercise or defence of legal claims. If you object to the processing of your personal data for direct marketing purposes, we will no longer process your personal data for such purposes.
- **The right to withdraw consent** – where we process your personal data on the basis of your consent, you have the right to withdraw your consent at any time. However, such withdrawal does not affect the lawfulness of the processing that occurred prior to such withdrawal.
- **The right to provide us with instructions on the use of your personal data after your death** - you have the right to provide us with instructions on the management (e. g. storage, deletion and disclosure) of your personal data after your death. You can change or revoke your instructions at any time.

#### **G. THIRD PARTY WEBSITES**

Our website may contain links to other websites operated by third parties. Please note that this privacy policy applies only to the personal data that we collect. We are not responsible for the personal data that third parties may collect, store and use on their own websites. We recommend that you carefully read the privacy policy of each and every website you visit.

#### **H. HOW TO CONTACT US**

This privacy policy may be updated from time to time. We will inform you of any substantial changes relating to the use of your personal data.

If you have any questions about this privacy policy or the use of your personal data, please contact us by email at [contact@wileurope.org](mailto:contact@wileurope.org) or by post at 21 bis rue du Simplon, 75018 PARIS.

Before responding to your request, we may ask you for additional information to identify you. If you do not provide the requested information and, as a result, we are unable to identify you, we may refuse to respond to your request.

If you are not satisfied with our response to your complaint or if you believe that the processing of your personal data does not comply with data protection laws, you may file a complaint with the competent data protection supervisory authority. The Commission Informatique et Libertés (CNIL) is the data protection authority in France.