

DATA PROTECTION NOTICE – ELSA ALUMNI ONLINE

General

This Data Protection Notice is edited by ELSA Alumni ASBL, a non-profit organization under Belgian law having its registered office at Rue de Copernic no. 20, Uccle, BE-1180, Belgium and registered with the Banque carrefour des Entreprises under the number N° 0731596368 (hereafter, "**ELSA Alumni**", the "**Controller**").

ELSA Alumni offers a member platform allowing for social networking, microblogging, the creation of online communities to share information, ideas, personal messages and other content (hereafter, "**ELSA Alumni Online**" or the "**Platform**") to its members who have subscribed on the Platform and as such have a user account (hereafter, the "**Users**"). The Platform is available at the following URL address:

<https://community.elsaalumni.org/>

It is not possible to access the Platform without providing the mandatory data strictly necessary to create an account and authenticate the User. This Data Protection Notice describes the User's data subject rights regarding the processing of Personal Data by ELSA Alumni.

ELSA Alumni is committed to protecting the privacy of its members. To administer and manage ELSA Alumni, it is necessary to process certain personal data about alumni who register as a member.

In this regard, ELSA Alumni collects and processes Users' personal data in accordance with this Data Protection Notice.

For the purposes of this Data Protection Notice "**Personal Data**" means any information relating to a User (the "**Data Subject**").

ELSA Alumni is particularly aware and sensitive with regards to the respect of its Users' privacy and personal data protection. ELSA Alumni commits to ensure compliance of the processing it carries out as Controller in accordance with the Data Protection Laws.

Data Protection Laws are the provisions of the data protection laws applicable to the Kingdom of Belgium such are the General Data Protection Regulation n° 2016/679 (**GDPR**); the Law of 30 July 2018 on the protection of natural persons with regard to the processing of personal data (**Privacy Act**) and implementing decrees; the Law of 5 September 2018 establishing the Information Security Committee and amending various laws concerning the implementation of Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of individuals with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC; the Law of 3 December 2017 on the creation of a Data Protection Authority (**DPA**); the Law of 13 June 2005 on electronic communications (on cookies); Book VI and Book XII Belgian Economic Code (on direct marketing and cookies); the Royal decree of 4 April 2003 regulating advertising by electronic mail.

This Data Protection Notice is intended for the Users of the Platform of ELSA Alumni in their capacity as data subjects.

What Personal Data does ELSA Alumni collect?

ELSA Alumni collects certain Personal Data as necessary for Users' participation in the ELSA Alumni Network, including ELSA Alumni Online when Users register and create a user account via the e-invitation link. ELSA Alumni processes a range of Personal Data about Users which may include:

- Mandatory information: first and last name, private e-mail address, years of experience, banking details, current sector of activity, name of ELSA group.

- Optional personal information: middle name, ELSA positions held; ELSA Alumni information such as areas you could provide assistance with, country affiliations, other interests, gender, maiden name, headline, date of birth, birthplace, citizenships, biography, personal mobile phone number, skills, postal address (personal), current home/work location, dietary requirements, additional requirements (e.g. accessibility);
- Optional professional information: employer; position; current sector of activity, start date and end date, resume, work e-mail address, work mobile number, work landline number, additional postal address (office/work); web-address, link to LinkedIn Profile;
- Optional information on education: degree, field of study, start date and end date;
- Photographs and media content;
- Social media posts in the context of the use of the Platform;
- Additional information that you choose to provide to us in order to provide additional services;
- Other information related to the use of the Platform or other services when you communicate with the ELSA Alumni Board of Directors, their team or respond to a survey or otherwise.

The User may validly publish, at her/his own initiative, any content on the Platform which shall be kept by ELSA Alumni:

- Posts;
- Events;
- Groups;
- Jobs;
- Location.

Why does ELSA Alumni collect Personal Data?

ELSA Alumni will only process Users' Personal Data in accordance with the Data Protection Laws on the following legal grounds and purposes:

- as necessary for the **performance of the membership agreement**:
 - enrolment into, maintaining and carrying out the membership agreement;
 - notification of any changes to the ELSA Alumni Online Platform or Users' membership;
 - processing Users' contact requests and/or complaints.
- based on compliance with a **legal obligation** to which the controller is subject:
 - administrative purposes and accounting.
- based on **legitimate interests** pursued by the Controller or by a third party on behalf of the Controller:
 - in the event of necessary enforcement, exercise or defense of legal claims and/or in the event of actions by the courts within the framework of their judicial activities.
 - authenticating Users' access to the ELSA Alumni Network and ELSA Alumni Online Membership Account, and communicating with User via User's Account;
 - internal research and analysis to tailor our services and product information to User's needs and maintain the quality of services;
 - to prevent fraud or to ensure the network and information security of Users' IT systems.
 - developing statistics to improve the quality of the services proposed by the Platform, regarding the effective use of the Platform, regarding the different levels of activity on the Platform.
- based on **consent** provided by the User/Member:
 - sending out ELSA Alumni Online and Member notifications in line with Users' communication preferences, which you can indicate and change yourself in ELSA Alumni Online such as but not limited to invitations for events by ELSA Alumni or other Users, if the User has accepted to receive such invitations;
 - for direct marketing purposes, within the preferences identified by the Member on the Platform.

Commitment of ELSA Alumni

ELSA Alumni commits to process Personal Data in accordance with the Data Protection Laws and undertake to, notably, respect the following principles:

- Process Personal Data lawfully, fairly, and in a transparent manner;
- Only collect and process the Users' data for the purposes for which it was collected;
- Ensure that the Personal Data processed are adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed;
- Do the best efforts to ensure that the Personal Data processed are accurate and, if necessary, kept up to date and take all reasonable steps to ensure that Personal Data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay;
- Keep Personal Data for no longer than is necessary for the purposes for which they are processed;
- Put in place all necessary technical and organizational measures in order to ensure the security, confidentiality, integrity, availability and the resilience of the process systems and services;
- Limit the access to the Personal Data to the persons duly authorized to this effect;
- Guarantee to the Users their rights under the Data Protection Laws in relation to the processing of their data and make the best efforts to satisfy any request, where this is possible.

If ELSA Alumni need to use Personal Data for a purpose other than that for which it was collected initially, ELSA Alumni will provide the Member, prior to such further processing, required information about the new purpose.

Users may withdraw their consent for the Processing of Personal Data at any time and free of charge by notifying ELSA Alumni at secgen@elsaalumni.org. When a User withdraws her/his consent, ELSA Alumni will terminate Users' membership and Users' access to ELSA Alumni Online. Withdrawal of consent shall not affect any obligations a Member has with respect to the membership fee.

How will ELSA Alumni contact User for marketing purposes?

ELSA Alumni will be communicating to User via e-mail regarding news, events, activities, opportunities, about Users' membership status and updates and on joint promotions or events. ELSA Alumni will not provide Users' data to any third parties for marketing purposes without Users' explicit upfront consent. Members may indicate and amend their communication preferences in the ELSA Alumni Online Platform at any point in time.

What are User's privacy rights?

ELSA Alumni takes all reasonable measures to keep Personal Data accurate and complete. Subject to limitations set out in the Data Protection Laws, Users have certain rights in respect of their Personal Data. In particular, Users have the right of access, rectification, restriction, erasure, object and data portability.

Does ELSA Alumni share Personal Data with any third parties?

ELSA Alumni does not share Personal Data with third parties unless required for administrative purposes and/or in order to deliver on the membership purpose.

ELSA Alumni only share Personal Data with third parties:

- if this is required by **law** (i.e. if required by any law enforcement authority or government official or investigative body in the case of breach of law, or as otherwise required by applicable law)
- with third party service providers that support **our business operations** (i.e. who store Personal Data or back up electronic information).
- with our **employees / subcontractors**, who are bound to an employment agreement or contractual agreement including confidentiality and non-disclosure clauses.

- with **processors** ELSA Alumni use to carry out activities in support of the purpose. ELSA Alumni selects its processors carefully with specific attention to privacy and data protection compliance and requires its processors to keep Personal Data secure at all times in line with this agreement and the Data Protection Laws. Assurance of such compliance is obtained from all processors, whether companies or individuals, prior to granting them access to Personal Data. In addition, our processors may not use or disclose Personal Data for any purpose other than providing the services on our behalf.

Processors include for example (but are not limited to): the provider of the membership database, the videoconferencing or teleconferencing provider, e-learning provider, payment processor, event locations and event management agencies, catering services etc.

ELSA Alumni makes its best effort to ensure that people having access to Personal Data remain as small as possible and maintain the confidentiality and security of Personal Data. ELSA Alumni only provides service providers and processors with the information they need to perform the services and requires them not to use Personal Data for any other purpose. ELSA Alumni does its best to ensure that all these service providers and processors only process Personal Data on its documented instructions and provide sufficient guarantees, in particular in terms of confidentiality, expert knowledge, reliability and resources, to implement technical and organizational measures which will meet the requirements of the Data Protection Laws, including for the security of processing. A list of main service providers and processors is attached to this Privacy Policy.

How long will ELSA Alumni keep User's data ?

The Personal Data related to the user account is retained only during the length of the User's subscription on the Platform. Following the termination of said subscription, the Personal Data collected upon the subscription as well as the content published by the User on the Platform shall be disposed of after a period of two (2) years. For the Personal Data collected on the legal ground of consent and in the case the User has exercised her/his data subject right with respect to erasure (‘right to be forgotten’) such Users' Personal Data will be disposed of as soon as possible in accordance with the Data Protection Laws.

Data storage and transfers

Personal Data are stored in the European Economic Area (EEA) by ELSA Alumni, its service providers and processors. However, depending on the processing, Personal Data may also be transferred to a country outside the EEA, to Controller's service providers and/or processors.

When transferring data outside the EEA, ELSA Alumni ensures that the Personal Data are transferred in a secured manner and in accordance with the Data Protection Laws. When the third country where the data are transferred to does not have a level of data protection equivalent to that of the EU, as determined by the European Commission (adequacy decision), ELSA Alumni will maintain appropriate or suitable safeguards and ascertain that such transfers are governed based on the model Standard Contractual Clauses adopted by the European Commission.

Validity and Changes to this Data Protection Notice

This Data Protection Notice shall apply to all Users and be effective from the start of Users' membership. ELSA Alumni may revise this Privacy Notice from time to time to reflect changes to its organization, business purposes, services or applicable laws. The revised Privacy Notice will be effective as of the published effective date. If the revised version includes a substantial change, ELSA Alumni will provide Users with 30 days prior notice by posting notice of the change on ELSA Alumni Online. ELSA Alumni may also notify Members of the change by email or other means.

Exercising Users' rights, complaints

User may exercise their rights by sending an email to secgen@elsaalbumni.org or by writing to ELSA Alumni's Secretary General and acting Data Protection Officer at:

ELSA Alumni ASBL
Attention: Secretary General/Data Protection Officer
Rue de Copernic no. 20, Uccle
BE-1180 Brussels
Belgium

Users can also review and edit their Personal Data in the Membership Account by logging in and updating their Personal Data directly.

In addition, in the event the User considers that her/his rights have not been respected, the User of which the Personal Data is processed can lodge a complaint before the competent supervisory authority. For any additional information, User can review Users' rights on the websites of the competent authorities.

The competent supervisory authorities are listed on the following website: http://ec.europa.eu/justice/article-29/structure/data-protection-authorities/index_en.htm.

Date of last update: 06/10/2025.

List of the main service providers:

Service Provider	Service	User can consult the privacy policy by clicking on the following link:
KIT UNITED 44 rue la fayette 75009 Paris France	HIVEBRITE solution	https://hivebrite.com/privacy-policy
Stripe 510 Townsend Street San Francisco CA 94103, USA	Payment Service	https://stripe.com/fr/privacy
Paypal 21 rue Banque 75002 Paris France	Payment Service	https://www.paypal.com/us/webapps/mpp/ua/privacy-full
Google Cloud Platform Gordon House, 4 Barrow St, Dublin, Ireland	Hosting of all data and content produced / provided by the User, as well as images ,	https://cloud.google.com/security/privacy/

<p>Amazon AWS</p> <p>38 avenue John F. Kennedy, L-1855, Luxembourg</p>	<p>profile pictures and backups</p>	<p>https://aws.amazon.com/compliance/gdpr-center/</p>
<p>Sentry</p> <p>132 Hawthorne Street San Francisco, CA 94107</p> <p>USA</p>	<p>Production and storage of error logs enabling our developers to correct the code</p>	<p>https://sentry.io/privacy/</p>
<p>Sendgrid</p> <p>375 Beale Street, Suite 300, San Francisco, CA 94105</p> <p>USA</p>	<p>Sending of emails from the Platform</p>	<p>https://api.sendgrid.com/privacy.html</p>
<p>Hivebrite, Inc.</p> <p>16 Nassau St, New York, NY 10038, USA</p>	<p>Customer support for the Platform</p>	<p>https://hivebrite.com/privacy-policy (Only ELSA Alumni as Controller is responsible for compliance with Data Protection Laws.)</p>

ELSA Alumni Cookie Policy

Version 6th of October 2025

In this policy ELSA Alumni uses the term “cookies” to refer to cookies and other similar technologies covered by the EU Directive on privacy in electronic communications.

1. What is a cookie?

A cookie is a small piece of data that a website asks User’s browser to store on User’s computer or mobile device. The cookie allows the website to “remember” Users’ actions or preferences over time. Most Internet browsers support cookies; however, users can set their browsers to decline certain types of cookies or specific cookies. Further, users can delete cookies at any time.

2. Why does ELSA Alumni use cookies?

ELSA Alumni uses cookies to learn how Users interact with its content and to improve Users’ experience when visiting its website(s). For example, some cookies remember Users’ language or preferences so that User does not have to repeatedly make these choices when they visit one of ELSA Alumni’s websites. ELSA Alumni also uses cookies to help with geolocation tracking in order to present User with the closest ELSA Alumni Network members. Additionally, cookies allow ELSA Alumni to serve specific content, such as videos on its website(s). ELSA Alumni may employ the learnings of Users’ behavior on its website(s) to serve User with targeted advertisements on third-party website(s) in an effort to “re-market” its products and services to User.

What types of cookies does ELSA Alumni use?

- **First-Party and Third-Party Cookies**

ELSA Alumni uses both first-party and third-party cookies on its website.

First-party cookies are cookies issued from the [ELSAalumni.org](https://elsaalumni.org) domain that are generally used to identify language and location preferences or render basic site functionality.

Third-party cookies belong to and are managed by other parties, such as ELSA Alumni Network business partners or service providers. These cookies may be required to render certain forms, such as the submission of a job application, or to allow for some advertising outside of the ELSA Alumni Network website.

- **Session Cookies**

Session cookies are temporary cookies that are used to remember Users during the course of Users’ visit to the website, and they expire when Users close the web browser.

- **Persistent Cookies**

Persistent cookies are used to remember Users’ preferences within the website and remain on Users’ desktop or mobile device even after User closes their browser or restart their computer. ELSA Alumni uses these cookies to analyse user behavior to establish visit patterns so that ELSA Alumni can improve its website functionality for User and others who visit its website(s). These cookies also allow ELSA Alumni to serve you with targeted advertising and measure the effectiveness of its site functionality and advertising.

3. How are cookies used for advertising purposes?

Cookies and ad technology such as web beacons, pixels, and anonymous ad network tags help ELSA Alumni serve relevant ads to User more effectively. They also help ELSA Alumni collect aggregated audit data, research, and performance reporting for advertisers. Pixels enable ELSA Alumni to understand and improve the delivery of ads to User, and know when certain ads have been shown to User. Since Users' web browser may request advertisements and web beacons directly from ad network servers, these networks can view, edit, or set their own cookies, just as if User had requested a web page from their site.

Although ELSA Alumni does not use cookies to create a profile of Users' browsing behavior on third-party sites, ELSA Alumni does use aggregate data from third parties to show User relevant, interest-based advertising. ELSA Alumni does not provide any personal information that it collects to advertisers. User can opt out of off-site and third-party-informed advertising by adjusting Users' cookie settings. Opting out will not remove advertising from the pages User visit, but, instead, opting out will result in the ads User see not being matched to Users' interests. This implies that the ad(s) User sees will not be matched to Users' interests by those specific cookies.

4. How are third party cookies used?

For some of the functions within ELSA Alumni's websites ELSA Alumni uses third party suppliers, for example, when User visits a page with videos embedded from or links to YouTube. These videos or links (and any other content from third party suppliers) may contain third party cookies, and ELSA Alumni encourages User to consult the privacy policies of these third-party vendors on their websites for information regarding their use of cookies.

5. How does User reject and delete cookies?

User can choose to reject or block all or specific types of cookies set by virtue of Users' visit to the ELSA Alumni Network website by clicking on the cookie preferences on ELSA Alumni's website(s). User can change User's preferences for the ELSA Alumni Network website and/or the websites of any third-party suppliers by changing User's browser settings. Please note that most browsers automatically accept cookies. Therefore, if User does not wish cookies to be used, User may need to actively delete or block the cookies. If User reject the use of cookies, User will still be able to visit ELSA Alumni's websites but some of the functions may not work correctly. User may also visit www.allaboutcookies.org for details on how to delete or reject cookies and for further information on cookies generally. By using ELSA Alumni's website without deleting or rejecting some or all cookies, User agrees that ELSA Alumni can place those cookies that User has not deleted or rejected on Users' device.