



Data Privacy Policy in accordance with the EU General Data Protection Regulation (EU) 2019/679

IMA-EUROPE A.I.S.B.L.

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IMA-Europe is a Belgian not-for profit organization registered under the enterprise number 0452.946.151 and in the European Commission's transparency register under the ID number 14190001484-01.

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IMA-Europe, and its Association members listed in Annex I, has a policy to respect and treat with confidentiality all personal data it processes. The below data privacy policy has been established to cover how IMA-Europe uses and processes personal information and data. It also informs about data privacy rights (see section 7) that individuals can exercise at any-time.

1. Type of Personal Data

In your dealings with IMA-Europe, you may provide us with personal data information. This information may include name, surname, gender, professional function, email address, address, phone number(s), employer, subscription to distribution lists, registration to events and attendance to IMA-Europe meetings. IMA-Europe may also have collected additional information such as individual photos, pictures and videos taken at meetings, statements made during meetings and any other data necessary for participating to external meetings, relevant for administrative purposes or required by law.

Some of this data may be considered as personal data under the EU General Data Protection Regulation (GDPR) – regulation EC 2016/679. IMA-Europe's self-assessment is that most of the data it collects presents limited risks for your fundamental rights considering that mainly professional information is used and that adequate measures are in place to avoid data breaches.

2. Methods of Personal Data Collection

Most of the time, IMA-Europe collects personal data directly from the data subjects or from their employers, in the case of member companies and partner organisations. Personal data may sometimes be obtained through other means such as interaction on the websites or extranet of IMA-Europe, registration and participation to meetings and events.

IMA-Europe does not use any Third-Party service provider to collect personal data on its behalf. It may however use public sources, such as the directories of the European Institutions. In the event that Third-Party provider is contracted by IMA-Europe to collect personal data in the future, IMA-Europe will contractually make sure that the concerned Third-Party is required to use your personal data in accordance with the provisions of this Privacy Statement.

3. Purpose of use and processing of personal data

The information provided to IMA-Europe is primarily used and processed for membership management and the fulfilment of IMA-Europe's missions. Specifically, it is used for contacting you, keeping you informed about the activities of the association (news or working groups mailing lists), responding to or asking questions, or for any other purpose of communicating with you for fulfilling the missions of the association.

To fulfil its communication and advocacy activities, IMA-Europe processes contact details of journalists, officials from the European Institutions and Member States of the EU, Members of the European Parliament, academics, consultants as well as industry and non-governmental organisations stakeholders. IMA-Europe's use of "mass" communication tools is limited to the occasional sending of press releases, a potential invitation to an event and a few occasional save the dates and communications. The latter are always not commercial and are limited and focused in distribution. IMA-Europe endeavours to obtain and archive a prior and informed explicit consent of recipients of information sent by way of "mass" communication channels. The possibility of withdrawing the prior explicit consent can be exercised at any time (see section 7).

Other information is used for fulfilling administrative tasks and for complying with legal obligations. This may include for instance your attendance to meetings or statements made during meetings, which are used for drafting minutes of meetings. For members of the Board of Directors of IMA-Europe and of its sections, it also includes additional personal information such as home address, birthdate and place, copy of ID card or passport, for the purpose of publication in the Belgian Official Journal (*Moniteur Belge*) of the list of administrators.

It is IMA-Europe's understanding that the above purposes of data use fall within the "legitimate interests" of IMA-Europe. IMA-Europe commits to strictly limit its data and information collection to this type of legitimate interests.

4. Disclosure of personal data to Third-Parties

IMA-Europe shall under no circumstance sell your personal data to Third-Parties or share it for commercial gain. It may however need to disclose your personal data to Third-Parties for the fulfilment of its activities. This may include sharing the contact details of members with other members, for example between participants to a working group, or sharing the birthdate and ID card or passport number with the European Institutions for security checks prior to entering the European Institutions' premises.

It is also possible that IMA-Europe is obliged to disclose your personal data to public authorities as required by laws or regulations.

5. Cross-border processing of personal data

Any transfer of personal data outside the European Economic Area (EEA) to a recipient whose home address or registered office is in a country which does not fall under the adequacy decision enacted by the European Commission shall be governed by the provisions of a data transfer agreement, which shall contain 1) the standard contractual clauses as referred to in European Commission Decision 2010/87/EC, or 2) any other mechanism pursuant to privacy legislation, or any other regulations pertaining to the processing of personal data.

6. Storage of personal data

The personal data of employees of member companies and partner organizations of IMA-Europe is stored for the duration of their employer's membership in IMA-Europe, except in cases where IMA-Europe is notified that the said employee has left the organization. In that case, the personal data of employees is deleted at the time of IMA-Europe receiving the said notification.

Meetings' minutes, lists of participants and correspondence with members are kept for the duration of the activity of the association for demonstration of compliance with competition law and for history records.

All other personal data is kept for the time strictly necessary to achieve the purpose(s) for which they were collected.

7. Your Privacy Rights

At any time, you may exercise the following rights with regards to your personal data processed by IMA-Europe:

1. Right of access to personal data
2. Right to rectification, completion or updating of personal data
3. Right to delete personal data ("right to be forgotten") and
4. Right to unsubscribe from any communication in case no further involvement is wished with IMA-Europe (e.g. in case of change of position / responsibilities).

The point of contact for individuals to exercise the above rights with regards to their personal data is IMA-Europe's secretariat: +32 (0)2 210 44 10 – secretariat@ima-europe.eu

8. Security of personal data

IMA-Europe undertakes to take all reasonable, physical, technological and organizational precautions in order to avoid 1) unauthorized access to your personal information and 2) loss, abuse, or alteration of your personal data. Notwithstanding the above, an infallible level of security can never be guaranteed. Should any data breach occur, it will be communicated to the Privacy Commission of Belgium as required by law.

IMA-Europe shall store all personal data, which it has collected, on its own servers or on those of service providers located in the European Union or in so-called Safe Harbours in Third Countries. Paper records shall be stored in the offices of IMA-Europe.

All the staff of the IMA-Europe secretariat has been and will continue being kept informed about the principles of the regulation EC 2016/679 and the subsequent internal procedures for the management of personal information and data.

9. Website and social media

To access and navigate websites of IMA-Europe, there is no need to provide any personal data. Personal information will only be collected when users send a query to IMA-Europe through the contact form. Personal data will only be used by IMA-Europe to administer the service requested. However, because these websites use Google Analytics to quantify and evaluate the use of web pages, a number of pages use cookies. Enabling these cookies is not strictly necessary for the website to work but it will provide a better browsing experience. Users can delete or block cookies. The cookie-related information is not used to identify users personally.

When interacting on the IMA-Europe's social media platform accounts (Twitter, LinkedIn, Facebook, and YouTube), your personal data consent and use are covered by the terms and conditions of the relevant social media platforms.

IMA-Europe's Data Privacy Policy applies only to IMA-Europe's databases, websites and communications. When you land on external websites or platforms of third parties, even by way of links provided on IMA-Europe's channels, IMA-Europe's data privacy policy ceases to apply.

10. Update of the Data Privacy Policy

IMA-Europe is entitled to update this Data Privacy Policy as and when it deems it necessary. Any such changes will be notified to registered contacts and posted on IMA-Europe's websites Data Privacy Policy pages.

11. Contact

The point of contact for individuals wishing to exercise their rights with regards to their personal data is IMA-Europe's secretariat - +32 (0)2 210 44 10 – secretariat@ima-europe.eu

In case of questions about this Data Privacy Policy, please contact IMA-Europe's secretariat - +32 (0)2 210 44 10 – secretariat@ima-europe.eu

Annex I

List of IMA-Europe's member associations

Acronym	Full name	Enterprise number
CCA-Europe aisbl	European Calcium Carbonate Association	456.204.262
EBA aisbl	European Borates Association	465.220.611
ESMA aisbl	European Specialty Minerals Association	881.601.326
EUBA aisbl	European Bentonite Association	472.150.270
EuLA aisbl	European Lime Association	479.082.505
EUROFEL aisbl	European Association of Feldspar Producers	459.768.419
EUROSIL aisbl	European Association of Silica Producers	459.769.904
EUROTALC aisbl	European Association of Talc Producers	417.138.701
KPC-Europe aisbl	European Kaolin and Plastic Clays Association	465.221.502