

# Privacy Policy

## European Speleological Federation (FSE)

This Privacy Policy has been approved by the General Assembly of the European Speleological Federation (FSE) held in Ebensee, Austria on the 25<sup>th</sup> August 2018  
Updated on 1<sup>st</sup> September 2022

When you contact us, visit our websites or trust us with your information. This Privacy Policy is meant to help you understand what information we collect, why we collect it and what we do with it. It is important and we hope that you will take time to read it carefully.

### This Privacy Policy explains:

- What information we collect and why we collect it.
- How we use that information.
- The choices you have and your rights, including how to access and update information.

### Changes to data protection law

The law in relation to data protection has been changed on the 25<sup>th</sup> May 2018 when the General Data Protection Regulation (GDPR) came into force in European countries

We will notify you through the FSE channels of any significant changes to this Privacy Policy . We may need to ask you to agree to certain changes where we have obtained your consent to us using your personal information.

### 1. Who we are and how you can contact us

This Privacy Policy is issued by the European Speleological Federation (FSE), officially registered in Luxembourg as Fédération Spéléologique Européenne asbl at the Registre de Commerce et des Sociétés de Luxembourg under nr. F7846 and officially located at 2, Rue du Fort Olisy, 2261 Luxembourg-Ville, Luxembourg. The FSE therefore is under supervision of the National Commission for Data Protection of the Grand-Duchy of Luxembourg (Commission Nationale pour la Protection des Données, 1, avenue du Rock'n'Roll, 4361 Esch-sur-Alzette, Luxembourg). When you are visiting our websites or trust us with your information the FSE is the data controller.

We have appointed a Data Protection Officer (DPO) who is responsible for overseeing questions in relation to the FSE Privacy Policy. If you have any questions in relation to the Privacy Policy, including any request to exercise your rights, please contact the DPO at [DPO@eurospeleo.eu](mailto:DPO@eurospeleo.eu) .

When we refer to our websites, we mean our websites at: <http://www.eurospeleo.eu/> and <http://speleo-tv.eu/> .

## 2. Where we collect your personal information from

We only collect, store and transfer personal information about you that you give to us in the following ways:

- When you are officially appointed as a (vice-)delegate to the FSE by your national speleological organisation or your country. Your personal information can also be provided to the FSE by your national organisation. When you are appointed by your national organisation or country as (vice-)delegate you are considered to be a delegated member of the FSE.
- When you subscribe by e-mail to one of our newsletters or wishes to be informed otherwise on a (ir)regular basis.
- When you are a participant to a EuroSpeleo Project and your information is provided to the FSE by the organiser of the EuroSpeleo Project. Personal information can only be provided on the official application form of the EuroSpeleo Project. We will assume that the organiser of the EuroSpeleo Project has asked permission of the participant to provide his personal information.
- When you e-mail us or send us letters for any reason.
- When you engage with us on social media, your social media username, if you interact with us through those channels.
- When personal information is published in official reports of EuroSpeleo Projects. We will assume that the organiser of the EuroSpeleo Project has asked permission of the participant to use his personal information in the official report. Official reports of EuroSpeleo projects are published on the FSE website at: <https://www.eurospeleo.eu/eurospeleo-projects/>.
- When you send us photographs and images of yourself or when photographs or images of yourself are published in the official reports of EuroSpeleo Projects. We will assume that the organiser of the EuroSpeleo Project has asked permission of the participant to use his photograph or image in the official report. Official reports of EuroSpeleo projects are published on the FSE website at: <https://www.eurospeleo.eu/eurospeleo-projects/>.

## 3. Data we collect about you

We may collect, use, store and transfer different kinds of personal information about you which we have grouped together as follows:

**Identity data** – name, username and photographs.

**Contact data** – home address, e-mail address, telephone numbers and social media addresses.

We do not collect any special categories of personal information about you. This includes details about race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, organisation memberships different from that of speleological organisations, information about your health and genetic and biometric data.

#### 4. How we use your personal information

We are only allowed to use personal information about you if the law allows us to. We have set out in the table below the personal information which we collect from you, how we use it and the legal basis on which we rely when we use the personal information.

Most commonly, we will use your personal information in the following circumstances:

- Where it is necessary for others to have access to (vice-)delegates of member countries by writing, telephone or e-mail to obtain information. This in the capacity as a delegated member of the FSE and as long as you are officially appointed as a delegated member by your national organisation or country. This information is published in the Member Directory of the FSE on the FSE website under the Members section. The website and the e-mail addresses in the mailing lists are kept at our provider Aruba S.p.A., via San Clemente 53, 24036 Ponte San Pietro (BG), Italy. This information is also kept by the secretary of the FSE and also in the FSE cloud service provided by pCloud AG, 74 Zugerstrasse Str, 6340 Baar, Switzerland.
- Where it is necessary to send relevant information by e-mail to (vice-)delegates or member countries. This information is also kept in the in the Member Directory of the FSE.
- Where it is necessary to send out newsletters or other information by e-mail for those who did subscribe or asked for this service. The e-mail addresses are only kept in the mailing lists established at our provider Aruba S.p.A., via San Clemente 53, 24036 Ponte San Pietro (BG), Italy.
- Where it is necessary to contact participants of EuroSpeleo Projects by e-mail in case we need further information from this participant or about the project. This information is provided through the official application form and kept by the FSE vice-secretary and also in the FSE cloud service provided by pCloud AG, 74 Zugerstrasse Str, 6340 Baar, Switzerland.
- Where it necessary but only after prior consent to the project organiser to have personal information or photographs in the official report of the EuroSpeleo project published on the FSE website. The website is kept at our provider Aruba S.p.A., via San Clemente 53, 24036 Ponte San Pietro (BG), Italy. This information is also kept by the vice-secretary of the FSE and also in the FSE cloud service provided by pCloud AG, 74 Zugerstrasse Str, 6340 Baar, Switzerland.
- Where we need to comply with a legal or regulatory obligation (for example, we pass on details of people involved in fraud or other criminal activity affecting us to law enforcement agencies).
- Where we can collect and process your data with your explicit consent (for example when you give us your e-mail address to receive newsletters or other information).

<i>purpose and activity</i>	<i>type of data</i>	<i>our lawful basis or legitimate interest</i>
<p>Details of interactions with the FSE through writing, e-mail or social media, including relevant information of delegated members.</p> <p>Handling this information you sent enables the FSE to respond.</p> <p>The FSE also keeps record of information you sent to inform members of speleological organisations of FSE member countries.</p>	<p>Full name, address, telephone numbers and e-mail address of delegated members and copies of your communication with us.</p>	<p>We do this on this basis of our legitimate obligation to you as delegated member of the FSE and our legitimate interest in providing you in the best way of our service. We will delete all your personal information as soon as you are no longer a delegated member to the FSE.</p>
<p>Webnews (including social media), newsletters and other (ir)regular information to keep you informed about relevant FSE and speleological information.</p>	<p>E-mail address or social media username.</p>	<p>This will be subject to your prior consent. If we do not have this information then we would not be able to contact you. You can of course let us know at any time when you do not want to receive this information.</p>
<p>Details of participants of EuroSpeleo Projects that enables the FSE to interact in case of questions about participants or projects.</p>	<p>Full name and e-mail address.</p>	<p>This will be subject to prior consent the participant gives to the project organiser to supply his full name and e-mail address on the official application form of the EuroSpeleo Project.</p>
<p>Details or photographs of participants of EuroSpeleo Projects that are published in official reports of the project.</p>	<p>Full name, e-mail address or photographs.</p>	<p>This will be subject to prior consent the participant gives to the project organiser to publish his full name, e-mail address or photograph in the official report of the project that will be published on the FSE website.</p>

We will only use your personal information for the purposes for which we collect it, unless we reasonably consider that we need to use it for another reason that is compatible with the original purpose. If we need to use your personal information for an unrelated purpose we will notify you and we will explain the legal basis which allows us to do so. We do not share information with third-parties other than the parties mentioned above who support our websites, mailing lists or cloud service. We require those parties to respect the security of your personal information and to treat it in compliance to GDPR. We do not allow our third-party service providers to use your personal information for their own purposes.

The FSE does not use any cookies on their websites. Our website may include links to third-party websites. You leave our website by clicking on those links and we encourage you to read the privacy notice or policy of every website you visit. The FSE does not control these third-party websites and is not responsible for their privacy statements.

We have put in place appropriate security measures to prevent your personal information being accidentally lost, used or accessed in an unauthorized way, altered or disclosed. In addition, we limit access to your personal information to those in function at the FSE who have a strict need to know and they will keep all information strictly confidential.

We will only retain your personal information for as long as necessary to fulfil the purposes we collect it for. For example, until you are no longer a delegated member or un-subscribe to a service.

## **5. Your rights**

Under certain circumstances you have rights under GDPR in relation to your personal information. Information about your rights are as follows:

**Request to access** to your personal information (commonly known as a “data subject request”). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.

**Request correction** of your personal information that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected.

**Request erasure** of your personal information. This enables you to ask us to delete or remove personal information where there is no good reason for us to keep it. You have the right to ask to delete or remove your e-mail address from one of our subscriber e-mail lists. Note, however, that we may not be able to remove your personal information as long as you are a delegated member of your country as these are kept for a specific purpose as mentioned before.

### **Making a complaint**

Please let us know if you are unhappy with how we have used your personal information by contacting the DPO of the FSE at [DPO@eurospeleo.eu](mailto:DPO@eurospeleo.eu).

You also have the right to complain at the Luxemburg National Commission for Data Protection. We would be grateful for the change to deal with your concerns before you approach the National Commission for Data Protection in Luxemburg, so please contact us in the first instance.