

EFRAG PRIVACY POLICY

Introduction

EFRAG (European Financial Reporting Advisory Group) is a private not-for-profit association (AISBL/ IVZW) with registered office at 1000 Brussels, 35 Square de Meeûs and with company number 0478.422.212. EFRAG collects information about its Members, Members of its working groups, people involved in EFRAG's activities, people using EFRAG's website or contacting EFRAG through other media as well as people that EFRAG engages within the context of its mission. Some of this information will contain personal data as defined in the European General Data Protection Regulation¹ (GDPR) and the national laws regarding the processing of personal data (hereafter called "Data Protection Laws").

EFRAG intends to comply with relevant Data Protection Laws in all its activities given that EFRAG involves a variety of groups, organises events and outreaches, conducts field tests, organises public consultations, and collects information through its website as part of EFRAG's due process as well as in the operation of its website.

This Privacy Policy (the Policy) explains how EFRAG processes personal data, when personal data is collected and provides information on the cookies that EFRAG uses on its website. The Policy is designed to ensure that you are fully aware of how your personal data is processed and stored so that EFRAG can fulfil its obligations toward you as a data subject.

If you do not agree with this Policy, please do not use any part of EFRAG's website. If you signify acceptance of this Policy by checking the relevant tick-box, this constitutes a positive action confirming your consent for us to use the personal data you provide to us in accordance with this Policy.

Who is concerned by this Policy?

This Policy covers the collection and other processing of personal data of EFRAG Members, Members of EFRAG working groups, people involved in EFRAG's activities and people using

¹ Regulation (EU) 2016/679. You may also wish to consult the Data Protection Law Enforcement Directive (Directive (EU) 2016/680) and the e-Privacy Directive (Directive 2002/58/EC).

EFRAG's website or contacting EFRAG through other media (e.g. subscribers to newsletters or those registering to events EFRAG organises or co-organises), as well as people that EFRAG engages within the context of its mission.

Who is responsible for processing your personal data?

EFRAG acts as the data controller for the processing of your personal data collected through the EFRAG website or other media or means.

Contact information

If you have any queries relating to this Policy or you wish to notify us about any of the matters set out in the policy, please contact us by writing to privacy@efrag.org or by post to EFRAG, Square de Meeûs 35, 1000 Brussels.

Who processes your personal data?

EFRAG makes use of third parties who process your personal data on behalf of EFRAG ("data processors"). EFRAG may use these data processors to conduct research, process data or develop and maintain EFRAG's website and its content.

Every data processor must provide adequate safeguards with regard to appropriate technical and organisational security measures and must comply with the obligations of the Data Protection Laws.

For what purposes does EFRAG process your personal data?

Your personal data will only be used for purposes limited to EFRAG's activities which include:

- As part of our due process:
 - Organising events and other form of outreaches;
 - Conducting field work² including field tests, interviews; surveys and other forms;
 - Organising public consultations including receiving of comment letters³;

² EFRAG's field work is carried out based [EFRAG Field Work Policy: Financial Reporting](#).

³ All comment letters received through the website or otherwise will be on the public record and posted on EFRAG's website unless the respondent requests confidentiality.

- Sending communications to keep you informed of EFRAG's activities, including invitations to EFRAG public events and meetings, in case of subscription to EFRAG news items;
- Sending communications in support of meetings or the functioning of the EFRAG working groups;
- Other administrative purposes;
- Processing any enquiries, remarks or complaints raised and responding to any incoming communications; the detection of and protection against fraud, error, criminal or illegal behaviour and/or any other act contrary to the conditions under which EFRAG's activities are offered.

You will not receive any e-mail from EFRAG simply because of visiting its website.

On which legal basis does EFRAG process your personal data?

EFRAG processes your personal data collected through its website on the basis of:

- The explicit acceptance of this Policy as part of the subscription to our news item, registration for events and public meeting; submitting comment letters; and contacting EFRAG and/or
- Complying with legal obligations; and/or
- EFRAG's legitimate interest in carrying out its activities in so far as it exceeds your interests or fundamental rights and freedoms.

How are your personal data collected?

Your personal data are obtained either via yourself, for example by filling in online forms or providing information to us otherwise, either via various technical means used by the Website to optimise your experience and to detect any (technical) errors on the Website, such as cookies (see below) and log information.

Which personal data does EFRAG collect?

EFRAG may collect the following personal data on the Website and during its activities:

- First and last name
- Company name and address
- Email address
- Contact telephone number
- Function and type of professional background
- Image and voice recording

- IP address, and as part of the functioning of cookies, the presumed place of consultation, time and day of consultation, the web address from which you reached EFRAG's website, which pages were visited, the links on which you click, and other actions taken on the website;
- Information to compile statistics and perform analyses;
- Data regarding the communication between EFRAG and you (e.g. emails).

Transfer of your personal data within the EU

Your personal data may be shared with data processors and public authorities (to the extent the latter are effectively entitled thereto).

Other than that, your personal data will not be sold, transferred or communicated to third parties. EFRAG does not share personal data with any third parties for marketing purposes.

Transfer of your personal data outside of the EU

It may be possible that your personal data is transferred to and processed in countries outside of the European Economic Area. In such a case, EFRAG will ensure that this is done in accordance with the Data Protection Laws.

How does EFRAG keep your data safe?

EFRAG is committed to protecting the privacy and security of the user visits to our website. EFRAG applies technological standards (e.g. firewall, encryption, etc.) to make sure the risk of breaches is minimised. However, despite the security measures EFRAG has in place, please be aware that no computer system is completely secure and there is always some degree of risk whenever (personal) data is transferred.

EFRAG staff is made aware of the importance of data protection and is committed to follow the appropriate steps to respect privacy, confidentiality and security of your personal data.

In case of a data breach EFRAG will use all reasonable organisational and technical means available to solve and eliminate the breach. If EFRAG becomes aware that such breach might imply a high risk to the rights of the persons involved, EFRAG will communicate the personal data breach to the persons concerned as soon as possible.



How long does EFRAG keep your personal data for?

EFRAG keeps your data for as long as your relationship with EFRAG persists (e.g. a membership, a contract basis, an interest in EFRAG's activities resulting in newsletter subscription). This is without prejudice to specific limitation periods foreseen by law allowing to conserve personal data for longer periods of time.

What are your rights?

You have several rights concerning the processing of your personal data EFRAG holds about you under the applicable legislation. You may exercise these rights by contacting EFRAG at privacy@efrag.org indicating the right you want to exercise. You may also use this email address if you wish to make a complaint regarding your privacy. EFRAG will respond to such requests and whether or not to comply with such requests in accordance with applicable law and, in principle, within a period of one month, also in accordance with applicable law.

You can also lodge a complaint with the Belgium Data Protection Authority (l'Autorité de protection des données) at contact@apd-gba.be if you feel that EFRAG has not acted in line with the applicable data protection and privacy legislation.

Right to object

You have the right to object, on grounds relating to your particular situation, to the processing of your personal data based on the legitimate interest of EFRAG. EFRAG shall cease the processing of these data unless compelling legitimate grounds for the processing which override your interests, rights and freedoms or for the establishment, exercise or defect of legal claims.

Right to withdraw consent

You have the right to withdraw consent at any time. This withdrawal shall not affect the lawfulness of the processing based on consent before such withdrawal.

Right of access

You have the right to access your personal data and to obtain a copy of these personal data. You also have the right to certain information concerning the processing of your personal data, including the purposes of the processing, the categories of personal data, the categories of recipients, etc.

Right to rectification

You have the right to have inaccurate personal data rectified, updated or to have incomplete personal data completed.

EFRAG uses reasonable endeavours to ensure that all personal information it holds is accurate and up to date. Inaccurate or outdated information will be removed. Please assist us in keeping your information as accurate as possible by updating us if your relevant personal data change.

Right to erasure

You have the right to have your personal data deleted or the use of your personal data restricted if you believe that there is no (longer a) lawful ground for EFRAG to process those data.

Right to restriction of processing

You have the right to obtain from EFRAG restriction of processing of your personal data where you believe the data is not accurate or EFRAG may have no grounds for processing it. In case of a restriction of processing, the personal data may still be stored by EFRAG.

Right to data portability

You have the right to request to transfer of your personal data that EFRAG holds to another data controller.

Possibility to unsubscribe from EFRAG news items and outreach database

If registered for EFRAG's news items, you will receive information regarding EFRAG activities, including invitations to EFRAG public events and meetings. If you do not want to continue receiving news items or updates from us, you can contact us (see above) or click the unsubscribe function in the news item.

Users providing their contact details for inclusion in the EFRAG User Outreach database are explicitly invited, each time they are contacted, to let EFRAG know if they no longer want to receive information, requests and invitations from EFRAG. This applies mutatis mutandis to other stakeholders.

Cookies

EFRAG's website uses cookies. Cookies are small files stored by your browser on your computer's hard disk or mobile device that contain information to identify the returning visitor and are used to facilitate subsequent visits to EFRAG's website. You can switch off the use of cookies in your browser if you wish. However, bear in mind that if you do so, your visits to EFRAG's website may not run as smoothly.

Third party links on EFRAG's website

EFRAG website contains links to other websites. Please be aware that EFRAG is not responsible for the privacy practices of such other websites including cookies which you give directly to such third parties, or which they may collect about you while you visit pages hosted by them. EFRAG encourages you to be aware when you leave its website and to read the privacy statements of the other sites. This Policy applies solely to information collected by EFRAG's website.

Update of this Policy

EFRAG will revise or update this Policy if its practices or communication channels change or to comply with new legal requirements. Should any changes occur, they will be published on EFRAG's website by updating the policy without notice, together with the date of the change from which the updated policy is effective. Changes to this Policy will not apply retroactively.