

## THE EUROPEAN PETROLEUM REFINERS ASSOCIATION

### PRIVACY NOTICE FOR MEMBER COMPANIES' REPRESENTATIVES

The European Petroleum Refiners Association, acting through its Concawe division ("We", "us", "our"), is committed to complying with EU Privacy Law. This privacy notice (the "**Notice**") describes how We process the Personal Data We collect from You in connection with our annual collection of safety performance data.

We are a data controller. This means that We are responsible for deciding how We collect and use (process) Personal Data about You. We are required under GDPR to notify You of the information contained in this Notice.

#### 1. **What Personal Data do We collect about You?**

The personal data We collect about You are:

- (a) First Name and Last Name;
- (b) Email address;
- (c) Name of the organization you belong to;
- (d) Your professional fixed and/ or mobile phone number.

All together your "**Personal Data**"

We typically collect Personal Data directly from You or from the organization You belong by email or fax (in such case under the assumption that specific measures have been put in place by such organizations to lawfully provide us with your Personal Data).

#### 2. **How do We collect and process (use) your Personal Data? And on which legal basis?**

We use your Personal Data to:

- (a) send you the annual safety performance data survey;
- (b) establish and maintain communications with you;
- (c) provide content and services You request from us.

We do so based on our legitimate interest. As a trade association, we have the interest in carrying out the activities necessary to perform the purposes ascribed in our Operating Guidelines including data collection from Our members. In doing so, we considered your rights and expectations as a Data Subject and have assessed that your interest, fundamental rights and freedoms are not put at risks. When we collect and process your Personal Data based on legitimate interest, You have specific rights (see section 7 below for more information in that regard).

3. **Change of purpose**

We will only use your Personal Data for the purposes for which We collected it, unless We reasonably consider that We need to use it for another reason and that reason is compatible with the original purpose. If We need to use your Personal Data for an unrelated purpose, We will notify You and We will explain the legal basis which allows us to do so (as well as your rights in relation to such further processing).

4. **Which third-parties process your Personal Data? Do We share, disclose or transfer Personal Data?**

In order to conduct our activities, We may have to share or disclose your Personal Data with third parties, namely Our IT service providers.

We do not use other third-parties to process your Personal Data or otherwise transfer Personal Data outside of the EEA and/or disclose your Personal Data to other recipients than those identified in this Notice. If we were to do so, We will comply with EU Privacy Law.

5. **Data security**

Your Personal Data are treated as confidential.

In order to safeguard your Personal Data from unauthorized access, collection use, disclosure copying, modification, disposal or similar risks, We have put in place appropriate administrative, physical and technical measures. We update and test our security technology on an ongoing basis. We restrict access to Your Personal Data to those employees and staff who need to know that information to provide benefits or services to You. In addition, We train our staff about the importance of confidentiality

and maintaining the privacy and security of Your information. We commit to taking appropriate disciplinary measures to enforce our staff' privacy responsibilities.

## **6. How long will We retain your Personal Data?**

We retain your Personal Data in accordance with our retention policy. As a general principle, We keep your Personal Data only as long as it is necessary or legally required.

## **7. Your rights in connection with your Personal Data**

Under certain circumstances, by law You have the right to:

- (e) **Request access** to your Personal Data. This enables You to receive a copy of the Personal Data We hold about You and to check that we are lawfully processing it.
- (f) **Request correction** of the Personal Data that We hold about You. This enables You to have any incomplete or inaccurate information We hold about You corrected.
- (g) **Request erasure** of your Personal Data. This enables You to ask us to delete or remove personal information where there is no good reasons for us continuing to process it. You also have the right to ask us to delete or remove your Personal Data where You have exercised your right to object to processing (see below).
- (h) **Object to processing** of your Personal Data where We are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes You want to object to the processing on this ground.
- (i) **Request the restriction of processing** of your Personal Data. This enables You to ask us to suspend the processing of Personal Data about You, for example if You want us to establish its accuracy or the reason for processing it.
- (j) **Request the transfer** of your Personal Data to another party (data portability).

If You are dissatisfied with any aspect of our handling of your Personal Data, You have the right to make a complaint at any time to the Supervisory Authority.

## 8. How can You contact us?

For more information, or if You have questions about your Personal Data, on the way We collect and process Personal Data, or want to exercise any of your rights under this Notice, You can contact the association's Legal Advisor at +32 2 566 91. You can also contact the association via email at [privacy@petroleumrefiners.eu](mailto:privacy@petroleumrefiners.eu).

## 9. Changes to Notice

We may revise this Notice from time to time and any revisions will be made available to You via the survey tool.

## 10. Our contact details

European Petroleum Refiners Association  
Division : Fuels Europe or Concawe  
Boulevard du Souverain 165 -3<sup>rd</sup> floor, 1060 Brussels, Belgium  
Tel. +32 2 566 91 00  
Fax. +32 2 566 91 11  
[Email: privacy@petroleumrefiners.eu](mailto:privacy@petroleumrefiners.eu)

## 11. Glossary

In this Notice:

**"Data Subject"** means an identified or identifiable individual.

**"EU Privacy Law"** means the General Data Protection Regulation 2016/679 ("GDPR") and the Belgian national privacy laws, as amended from time to time.

**"Processing"** means any operation performed on Personal Data, manually or by automated means, such as collection, recording, organization, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

**"Supervisory Authority"** means the Belgian Data Protection Authority or the relevant data protection authority of the data subjects' habitual residence or place of work.

