



## Data Protection Policy

*(Personal information, its processing and privacy)*

### Purpose and scope

1. The purpose of this policy is to ensure compliance with data protection law in Belgium (the General Data Protection Regulation and related EU and national legislation). Data protection law applies to the processing (collection, storage, use and transfer) of personal information (data and other personal identifiers) about data subjects (living identifiable individuals).

2. Under data protection law, the Young European Federalists (JEF Europe) is identified as a data controller and as such is subject to a range of legal obligations.

3. This policy applies to all members and employees of JEF Europe, except when they are acting in a private or external capacity.

4. This policy should be read in conjunction with:

- JEF Europe's Statutes and Rules of Procedure;
- staff employment contracts and comparable documents (which outline confidentiality obligations when processing information);
- policies, procedures and terms of conditions of JEF Europe.

5. This policy is reviewed by the Executive Board of JEF Europe and approved by it. It is reviewed at least once every two years. The legally registered officers of JEF Europe remain responsible for ensuring appropriate resources are in place to achieve compliance with data protection law in line with an appropriate overall risk profile.

### Obligations of JEF Europe

6. JEF Europe upholds data protection law as part of everyday working practices through:

- a) ensuring all personal information is managed appropriately through this policy;
- b) understanding, and applying as necessary, the data protection principles when processing personal information;
- c) understanding, and fulfilling as necessary, the rights given to data subjects under data protection law;
- d) understanding, and implementing as necessary, JEF Europe's accountability obligations under data protection law; and
- e) the publication of data protection statements outlining the details of its personal data processing in a clear and transparent manner.



7. JEF Europe's Secretary-General shall fulfil the role of statutory Data Protection Officer, who will be responsible for:

- a) monitoring and auditing JEF Europe's compliance with its obligations under data protection law, especially its overall risk profile, and reporting on such to the Executive Board;
- b) advising JEF Europe on all aspects of its compliance with data protection law;
- c) acting as JEF Europe's standard point of contact with the Belgian [Data Protection Authority](#) with regard to data protection law, including in the case of personal data breaches; and
- d) acting as an available point of contact for complaints from data subjects.

8. JEF Europe shall otherwise ensure that this policy is easily accessible to both employees and members as well as any associated procedures and notes of guidance relating to data protection compliance; provide training as appropriate; and review regularly its procedures and processes to ensure they are fit for purpose. It shall also maintain records of its information assets.

9. Individual employees are responsible for:

- a) completing relevant data protection training, as advised by JEF Europe;
- b) only accessing and using personal information as necessary for their contractual duties;
- c) ensuring personal information they have access to is not disclosed unnecessarily or inappropriately and that it is expunged from all personal devices upon leaving the employment of JEF Europe;
- d) where identified, reporting personal data breaches, and working collaboratively to address them;

Non-observance of the responsibilities in paragraph 9 may result in disciplinary action against individual employees.

10. The obligations outlined above do not waive any personal liability for individual criminal offences for the wilful misuse of personal data under data protection legislation.



## Data Protection Statement for Members and Other Supporters

### How we use your personal information

This statement explains how JEF Europe (“we” and “our”) handles and uses data we collect about members and supporters (“you” and “your”).

In broad terms, we use your data to manage the ongoing relationship between JEF Europe and you as part of a community. This includes (but is not exclusive to) keeping in touch with you, keeping up to date on your achievements, providing you with opportunities for political engagement and development, and engaging with you on how you can continue to contribute to the Federalist movement and otherwise support JEF Europe.

We will retain your data indefinitely or until you request us to do otherwise. When changes are made to this statement, we will publish the updated version to our website and notify you by other communication channels as we deem appropriate or necessary.

The controller for your personal information is Young European Federalists, Rue d’Arlon 53, Brussels, Belgium. The Data Protection Officer for JEF Europe is the Secretary-General ([dataprotection@jef.eu](mailto:dataprotection@jef.eu)). The Secretariat should be contacted if you have any concerns about how JEF Europe is managing your personal information, or if you require advice on how to exercise your rights as outlined in this statement.

The legal basis for processing your personal data is that it is necessary for the purposes of our legitimate interests, where we have concluded that our interests do not impact inappropriately on your fundamental rights and freedoms, except where elsewhere in this statement we have indicated otherwise. You may ask us to explain our rationale at any time.

### How your data is used by JEF Europe

We collect and process your personal data for a number of purposes, including those outlined below.

- a. We retain biographical and engagement information that helps us identify and ensure your ongoing validity for membership of JEF Europe, and also to understand the nature of your engagement with JEF Europe and provide opportunities to deepen your engagement with Federalism.

In particular, we retain:

- any communication preferences confirmed by you;
- ways in which you have supported the work of JEF Europe.

When you provide this information, we will assume (unless you notify us otherwise) that we can use this information for other purposes outlined in this statement. We may supplement information from other public sources that we consider to be reliable (e.g. your public social media profile(s), high profile news reports or articles) and may check their accuracy with you from time to



time.

- b. We retain your contact details in order to correspond about news, events, political messages, campaigns and other initiatives from JEF Europe and selected partners.
- c. We value any financial contribution from our members and donations are one potential income stream for JEF Europe. Accordingly, we retain personal data in order to encourage the making of financial contributions to JEF Europe, and for the processing of any such contributions. In particular, we retain:
  - the purposes and amounts of any donations or other support provided by you;
  - the method(s) of payments used and related payment references;
  - your bank details (as and when needed for the processing of direct debit or other financial transactions);

Some of this financial information may need to be retained for statutory purposes for a number of years (e.g. anti-fraud, and accounting /audit matters). When you provide this information, we will assume (unless you notify us otherwise) that we can use this information for other purposes outlined in this statement.

- d. We retain personal data (provided by you) in order from time to time to promote third party services we believe will be of interest to you. The personal data we retain provided by you includes any preference to be excluded from such services.

If you have concerns or queries about any of these purposes, or how we communicate with you, please contact [dataprotection@jef.eu](mailto:dataprotection@jef.eu).

## Communications

You will always have the right to opt-out from any mass communications from JEF Europe and a link to unsubscribe will be included in any mass digital communications. Communications preferences can be amended directly through contacting [communication@jef.eu](mailto:communication@jef.eu).

## How we share your personal data

We believe that most members are interested in the Federalist movement as a whole and understand that JEF Europe is part of a broader eco-system including its national, regional, and local sections, its corresponding 'non-youth' wings (e.g. Union of European Federalists (UEF), sections of UEF), and the World Federalist Movement. JEF Europe has a strong preference as an organisation to maintain collaborative working across this Federalist network and so will routinely share information with these parties, subject to the putting in place of data sharing agreements. Such



agreements are necessary because though we are part of a larger community of Federalists, these groups are distinct legal entities.

Additionally, we may share data on a considered and confidential basis, where appropriate, with:

- selected companies who provide JEF Europe-branded or JEF Europe-endorsed products and services,
- volunteer partners closely related to us, and
- contractors providing services to you on our behalf or services to us (our “data processors”).

We also facilitate communication between individual members of JEF Europe, but in doing so we do not release personal contact details without prior permission.

Any transfers of your data overseas or to international organisations, as set out above, are protected either by an adequacy decision by the European Commission or by standard data protection clauses adopted by the European Commission.

## Your rights

You have the right: to ask us for access to, rectification or erasure of your data; to restrict processing (pending correction or deletion); to object to communications or direct marketing; and to ask for the transfer of your data electronically to a third party (data portability). Some of these rights are not automatic, and we reserve the right to discuss with you why we might not comply with a request from you to exercise them.

Where you opt out of all future communications or exercise your right to erasure, we will continue to maintain a core set of personal data (name, any membership identifiers) to ensure we do not contact you inadvertently in future. We may also need to retain some financial records about you for statutory purposes (e.g. anti-fraud and accounting/audit matters).

You retain the right at all times to lodge a complaint about our management of your personal data with the Belgian Data Protection Authority ([EN](#), [FR](#), [NL](#)).



## Data Protection Statement for Job applicants

### How we use your personal information

This statement explains how JEF Europe (“we” and “our”) handles and uses information we collect about applicants (“you” and “your”) for jobs. In broad terms, we use your data to manage your application to JEF Europe and our subsequent recruitment &/or election processes.

The controller for your personal information is Young European Federalists, Rue d’Arlon 53, Brussels, Belgium. The Data Protection Officer for JEF Europe is the Secretary-General ([dataprotection@jef.eu](mailto:dataprotection@jef.eu)). The Secretariat should be contacted if you have any concerns about how JEF Europe is managing your personal information, or if you require advice on how to exercise your rights as outlined in this statement.

The legal basis for processing your personal data is that it is necessary in order for you to enter into an employment contract with us.

### How your data is used by JEF Europe

Your data is used by us for in the first instance solely for the purposes of considering your suitability for employment and for us to manage our recruitment processes, including our monitoring of equality and diversity.

JEF Europe holds the following personal data relating to you, in line with the purposes above:

- personal details, including name, contact details (phone, email, postal);
- your application form and associated information submitted by you at that time;
- other data relating to your recruitment (including references we take up as part of the recruitment process, any pre-employment assessment of you, and any assessment of you at an informal or formal interview);
- any occupational health assessments and/or medical information you have provided, and related work requirements;
- evidence of your right to work in Belgium (e.g. copies of your passport);
- information relating to your age, citizenship, and gender, and, if you have provided us with it, other demographic information;
- any correspondence relating to the outcome of the recruitment process (either successful or unsuccessful).

We will not access personal data about you from social media sites, unless there is a legitimate interest for us to do so (for example, the role you have applied for has a significant public-facing element to it, or is involved with publicity and presenting us to the general public). Consequently, we do not routinely screen applicants’ social media profiles but, if aspects of your social media profile are brought to our attention and give rise to concerns about your suitability for the role in question, we may need to consider them.



## Your rights

You have the right: to ask us for access to, rectification or erasure of your data; to restrict processing (pending correction or deletion); and to ask for the transfer of your data electronically to a third party (data portability). Some of these rights are not automatic, and we reserve the right to discuss with you why we might not comply with a request from you to exercise them. Documents in support of an application to a position at JEF Europe will be deleted six months after an appointment has been made to the position advertised.

Failure to provide the information reasonably requested of you may result in an automatic disqualification from the recruitment process.

You retain the right at all times to lodge a complaint about our management of your personal data with the Belgian Data Protection Authority ([EN](#), [FR](#), [NL](#)).



## Data Protection Statement for Employees

### How we use your personal information

This statement explains how JEF Europe (“we” and “our”) handles and uses information we collect about our employees (“you” and “your”). In broad terms, we use your data to manage your relationship with JEF Europe, including your role and the performance of it, how we support you as an employer, and how you are paid, as well as other statutory requirements.

The controller for your personal information is Young European Federalists, Rue d’Arlon 53, Brussels, Belgium. The Data Protection Officer for JEF Europe is the Secretary-General ([dataprotection@jef.eu](mailto:dataprotection@jef.eu)). The Secretariat should be contacted if you have any concerns about how JEF Europe is managing your personal information, or if you require advice on how to exercise your rights as outlined in this statement.

Unless otherwise stated, the legal basis for processing your personal data is that it is necessary for the performance of the employment contract we hold with you, or for statutory purposes (e.g. processing your salary, tax and other contributions).

### How your data is used by JEF Europe

Your data is used by us for a number of purposes, including:

- a. supporting your employment and your performance in your role. Such personal data includes:
  - i. personal details, including name, contact details (phone, email, postal, both work and personal) and photograph;
  - ii. your current and any previous role descriptions;
  - iii. your current and any previous contracts of employment and related correspondence;
  - iv. any occupational health assessments and medical information you have provided, and related work requirements; and
  - v. your training and development qualifications, requests and requirements.
- b. ensuring that you have the right to work for JEF Europe. Such personal data includes:
  - your recruitment information (including your original application form and associated information submitted at that time);
  - other data relating to your recruitment (including your offer of employment and related correspondence, references we took up on your appointment, and any pre-employment assessment of you); and
  - evidence of your right to work in Belgium (e.g. copies of your passport).
- c. paying and rewarding you for your work. Such personal data includes:





- your bank details;
- details of your preferred pension scheme;
- your current and previous salary and other earnings (e.g. maternity/paternity pay, overtime), and the amounts you have paid in statutory taxes; and
- correspondence between you and JEF Europe, and between members and employees of JEF Europe, relating to your pay, pension, benefits and other remuneration.

In addition, we maintain records of your use or take-up of any benefit schemes provided by us, which we collate and monitor to review the effectiveness of these staff benefits. The legal basis for this processing is that it is in our legitimate interest to ensure that any staff benefit schemes represent good value for money to both you and us.

d. administering HR-related processes, including records of absences, appraisals of your performance and, where necessary, investigations or reviews into your conduct or performance. Such personal data includes:

- records of your induction programme and its completion;
- records of your performance appraisals with your line manager;
- records, where they exist, of any investigation or review into your conduct or performance;
- records of absences from work (including but not limited to annual leave entitlement, sickness leave, parental leave and compassionate leave); and
- correspondence between you and JEF Europe, and between members and employees of JEF Europe, regarding any matters relating to your employment and any related issues (including but not limited to changes to duties, responsibilities and benefits, your retirement, resignation or exit from JEF Europe and personal and professional references provided by JEF Europe to you or a third party at your request).

e. maintaining an emergency contact point for you. Such personal data includes details of your preferred emergency contact, including their name, relationship to you and their contact details.

f. monitoring equality and diversity.

g. disclosing personal information about you to external organisations, as permitted or required by law.

We would not monitor social media sites for any personal data relating to you, unless we believed there was a legitimate interest for us to do so and only if we inform you we might do this in advance. Consequently, we do not routinely screen your social media profiles but, if aspects of these are brought to our attention and give rise to concerns about your conduct, we may need to consider them.



## Who we share your data with

We would normally publish your name, photograph and work e-mail on our website and other JEF Europe materials.

We hold all information for the duration of your employment and for no more than twelve months after the end of your employment. After that time, we retain a small subset of personal data after your relationship with JEF Europe ends:

- personal details, including name and your preferred personal contact details (if we still have these);
- your previous salaries and other earnings, pensions and the amounts you have paid in statutory taxes;
- records of your performance appraisals with your line manager;
- records, where they exist, of any investigation or review into your conduct or performance;
- your reasons for leaving and any related correspondence;
- any references we have written subsequent to your employment with us.

We reserve the right to retain the personal data longer than the periods stated above, where it becomes apparent that there is a need to do so – for example, in the event of a major health or personal injury incident, records may need to be kept for up to forty years.

We then store in a permanent archive your full name and title, and your job title(s) and the corresponding dates of employment.

## Your rights

You have the right: to ask us for access to, rectification or erasure of your data; to restrict processing (pending correction or deletion); and to ask for the transfer of your data electronically to a third party (data portability). Some of these rights are not automatic, and we reserve the right to discuss with you why we might not comply with a request from you to exercise them.

Failure to provide the information reasonably requested of you may result in disciplinary action taken by JEF Europe, which could ultimately lead to your dismissal from employment.

You retain the right at all times to lodge a complaint about our management of your personal data with the Belgian Data Protection Authority ([EN](#), [FR](#), [NL](#)).



## Data Protection Statement for Users of JEF Europe's Websites

### How we use your personal information

This statement explains how JEF Europe (“we” and “our”) handles and uses information we collect when you visit the JEF Europe website(s) – e.g. [www.jef.eu](http://www.jef.eu). Where you engage with JEF Europe for another purpose (e.g. as a member or employee), there are other data protection statements to explain our management of your personal information. Where you enter your personal information into an online form for any specified purpose, you will be told about the use we will make of that information (e.g. to send you newsletters or to enable your attendance at an event).

The controller for your personal information is Young European Federalists, Rue d’Arlon 53, Brussels, Belgium. The Data Protection Officer for JEF Europe is the Secretary-General ([dataprotection@jef.eu](mailto:dataprotection@jef.eu)). The Secretariat should be contacted if you have any concerns about how JEF Europe is managing your personal information, or if you require advice on how to exercise your rights as outlined in this statement.

The legal basis for processing your personal data is that it is necessary for the purposes of our legitimate interests, where we have concluded that our interests do not impact inappropriately on your fundamental rights and freedoms. You may ask us to explain our rationale at any time.

We collect and process your personal information for operating and improving our webpages, analysing their use and ensuring the security of our websites.

- We do not currently use any third-party services to collect standard internet log information and details of your visitor behaviour patterns. This statement will be updated if such services are used in the future.
- We may also collect the request made by your browser to the server hosting the website which includes the IP address, the date and time of connection and the page you ask for. We use this information to ensure the security of our websites. We may use and disclose it as necessary in the event of a security concern or incident.

If you have concerns or queries about any of the above, please contact us at the address given above.

You have the right: to ask us for access to, rectification or erasure of your information; to restrict processing (pending correction or deletion); to object to communications or direct marketing; and to ask for the transfer of your information electronically to a third party (data portability). Some of these rights are not automatic, and we reserve the right to discuss with you why we might not comply with a request from you to exercise them.

You retain the right at all times to lodge a complaint about our management of your personal data with the Belgian Data Protection Authority ([EN](#), [FR](#), [NL](#)).