

PRIVACY AND DATA PROTECTION POLICY

CMDR COI

The **Privacy and Data Protection Policy** (hereafter the Policy) determines the types and purposes of use of Personal Data and Multimedia by the CMDR COE in the process of event application / registration, during and in the aftermath of events, and in administering membership and participation in the CMDR COE Community of Interest (Col). The Policy concerns data being subject of personal identification. This data will be accessible: 1. in its entirety, to the CMDR COE and relevant third parties, i.e. technical and administrative maintenance contractors, and 2. partially, to other members of the Col, and to the public via the Internet (i.e. CMDR COE website), in print publications, video and multimedia presentations, and/or for any purpose which may include, but not limited to display, public relations, marketing, designs, product preparation. All such uses will be for official CMDR COE purposes, such as public affairs and event advertisement.

The Policy describes opportunities, rights and choices you are provided with in regard to your Personal Data and to Multimedia collected, stored and managed by the CMDR COE. You will be provided with the contact details of the CMDR COE Chief Administrator for inquiries related with this Policy.

By consenting to this Policy, in full or in part, you understand that both face-to-face and online events (i.e. plenary and syndicate sessions), and forum discussions, may be recorded and in such case, an explicit mentioning shall be made. You agree to hold harmless the CMDR COE, its agents and assigns, from any and all actions, claims, and demands arising out of or in connection with the use of all or any part of the photographs (including computer images or reproductions of any kind), including any editorial or comment which may accompany the images in their displayed format and/or my name.

You understand you may withhold this permission and this assignment of rights, which requires you to make an explicit affirmative rejection of these conditions to the CMDR COE Chief Administrator at hristina.hristova@cmdrcoe.org with a statement declining to accept the conditions listed above. In such a case, your membership in the Col will be terminated and your account deleted by the Col administrator, except your Col activity, i.e. participation in forum discussions, materials shared and uploaded. Each Col member may delete information they have uploaded.

You may not revoke your consent, in full or in part, to the present Policy past your participation in a CMDR COE event.

Any other matters related to privacy and data protection, which may arise, and are not considered herein, shall be dealt with on a case-by-case basis, in congruity with applicable CMDR COE policies and procedures, under CMDR COE Director explicit guidance and upon CMDR COE Director formal sanction.

The CMDR COE will make every possible and reasonable effort to honour your preferences especially related to not allowing your name, quotes, photos or images in the CMDR COE written or published materials.

Exceptions

In certain cases, data collected, including Personal Data and Multimedia (i.e. images and photos), shall not be a subject of use for display or advertisement on either the CMDR COE web site and/or any other website or online or physical publication.

For certain face-to-face and/or online events, sessions may not be recorded and all discussions, including during plenary, syndicate and break times, conducted under Chatham House rules (explained here: <https://www.chathamhouse.org/about-us/chatham-house-rule>), which will again be clearly specified on the event calling notice.

What data do we collect and operate with?

The CMDR COE processes Personal Data lawfully, fairly and in accordance with relevant applicable data protection norms and rules. The CMDR COE collects and stores Personal Data received in written form (e-mails, registration for events, Col profile information, and/or in verbal communication (i.e. phone calls).

More precisely, the Personal Data the CMDR COE collects and stores includes:

Personal Data:

1. First Name
2. Family name
3. Official E-mail
4. Personal E-mail
5. Title / rank
6. Nationality
7. Date of birth
8. Organisation / structure
9. Job Title
10. Office phone
11. Background information
12. Interests

Multimedia

14. Information shared by the user, i.e. profile picture, within the Community of Interest / profile on the CMDR Col Platform.
15. Photos, images and video recordings (from both face-to-face and online events).

The data we collect during required online registration for events is necessary for administering participation and the provision of relevant information and guiding materials, including education and training (E&T) materials, as well as for the establishment and maintenance of the CMDR COE Col. In addition, Personal Data, i.e. names, ranks, positions / home organisation, and official e-mail addresses are shared, if no dissents or specific requirements received, within respective event groups.

Processing of Personal Data is carried out in a manner that ensures appropriate security. Access to information, which may identify you, is limited to the CMDR COE staff members, except data related to membership in the Col, and is physically, electronically and procedurally refined to the level needed for the performance of professional duties. Personal data shall be used for advertising purposes only after explicit consent – written weaver or specifically marked box in the Registration Form.

The data collected is used for official purposes only, and is therefore physically, electronically, and procedurally processed to that purpose. While using the data for improving the quality and relevance of our services, we control, to the best of our capacity and available technical systems, for ill-intended activities, inter alia, protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical and organisational measures unauthorised access to the

systems, misappropriation of personal identity, and hacker attacks. Access to CMDR COE services and products is managed through the Centre's Internet Portal (for courses and events) and the CMDR COE Col Website (for Col members). The user receives a system-generated e-mail with access credentials (user name and password) and is asked upon first log-in to customize the password and modify it regularly and preferably every 3 (three) months. Access to personal profiles allows users, either of the Internet Portal or the Col website, to change and modify Personal Data, and to allow or deny access, i.e. limit access, to that content by other members within the Col. The CMDR COE administrator and relevant contractors (maintenance and support) have full access to user data and activity at any time.

Who is given access to your Personal Data?

Data collected and stored is not provided to third parties, except when and if there is a requirement by our subcontractors in the performance of their assigned responsibility in any and all cases abiding by strict privacy and security obligations, the respect for which is continuously monitored by relevant CMDR COE staff members. The CMDR COE may be legally required, by state authorities or entities that are authorised by law to require and collect information containing Personal Data, to disclose personal information for further access, storage, and use by the afore-mentioned authorities following applicable normative regulations, or when such information has been disclosed to competent authorities in order to maintain the legal interests of the CMDR COE, or other users in case of legal disputes.

How long do we retain the data?

For CMDR COE events, including CMDR COE-organised, hosted, or co-sponsored events, including, but not limited to, courses, conferences, seminars, workshops, registration data is automatically deleted within **30 days** of the completion of the event and / or, for Col members, the deletion of an account (by the respective user) and / or the automatic expiry of an account (non-activity for 12 months). Data may be retained within the timeframe required to protect CMDR COE, and our other users against legitimate claims, as well as in order to be able to respond to legitimate queries from the competent authorities.

What are your rights regarding the data we process?

Users are entitled the right to request from the CMDR COE access to and rectification or erasure of Personal Data or restriction of processing concerning the user or to object the processing as well as the right to data portability. Such requests should be made explicit and a written form via e-mail or regular mail. Data is deleted provided that:1. **It is no longer necessary** for the purposes it was collected or otherwise processed.2. **there is an explicit withdrawal of consent** on which the processing of the data is based and there is no other legal basis for the processing. The user has the right to objection to the overall processing of Personal Data, which will result in a failure to provide some or any and all of our services. In case of objection to the processing of Personal Data for the purposes of direct marketing, the processing is terminated immediately.3. **there is a legal obligation impinging upon the deletion.** The process of deletion has two stages: 1. limiting public access to Personal Data, and 2. upon reaching the expiration of the

retention period, complete removal of Personal Data (deletion) from the CMDR COE-managed and operated systems. In case Personal Data is required for archival purposes, deletion requests may not be furthered provided that the storage of archival data is justified by an applicable law or by the CMDR COE in writing. If you believe that your Personal Data protection rights have been violated, and you do not find their deletion and removal exercised by the CMDR COE as satisfactory, you have the right to appeal to the national supervisory authority or to seek legal protection before the relevant competent national court.