



Privacy Notice

TRIP is sensitive to the protection of your personal data and is therefore committed to protecting and processing these in a spirit of complete transparency and in compliance with the relevant legislation.

The purpose of this notice is to provide full details in this regard by setting out in particular how TRIP collects, uses and stores personal data.

The EU General Data Protection Regulation of 27 April 2016 (GDPR) has been in force since 25 May 2018.

This notice is based on that legislation.

1. Overview

1.1 Scope

This notice mainly relates to the processing of personal data of those persons with whom TRIP comes into contact in the context of its services, remits and activities and of those who have visited its website www.tripasbl.be or have shown an interest in its activities and services. In addition, this document concerns the victims of terrorist events.

1.2 Definitions

PERSONAL DATA are any information concerning an identified or identifiable natural person, for example the name of a person, a photograph, a telephone number, an email address, a vehicle registration number, etc.

The **PROCESSING** of personal data covers, among other things, all aspects (automated and non-automated) associated with the collection, recording, consultation, storage, adaptation or alteration, retrieval, use, disclosure, erasure, destruction and so on of personal data.

TRIP ('Terrorism Reinsurance and Insurance Pool'), a non-profit organisation having its head office at Square de Meeûs 29, BE-1000 Brussels and registered with the Crossroads Bank for Enterprises under number 0895 577 145, is the **CONTROLLER** of the data processing it performs for itself.

1.3 Processed data

The processed data are personal data enabling you to be identified either directly (e.g. first name, surname) or indirectly (e.g. telephone number).

As part of its remit, TRIP is required to collect various personal data depending on the context, nature and purpose of the relevant service or project (see point 2), e.g.:

- identity data: first name, surname, address, etc.;
- contact data: postal address, email address, telephone number, etc.;
- employment details: role, job title, etc.

2. Purposes of processing

TRIP processes personal data for various purposes. TRIP seeks to only process data that are relevant to pursuing the purpose of the processing.

For example, TRIP processes personal data:

- for reasons that are in the legitimate interest, to ensure the smoothest possible operation and the best possible service. In such a case, TRIP seeks to maintain a proportionate balance between this legitimate interest and the respect for privacy.
Examples:
 - knowing who TRIP's members and contacts are with a view to informing them of its activities and services;
 - protecting its own interests and those of its members;
 - follow-up and monitoring the propriety of operations;
 - ...
- to respond to requests from the public authorities (anonymous aggregated statistics) and the Commission for Assistance to Victims of Intentional Acts of Violence, in order to avoid double compensation;
- based on consent granted by you (for e.g. cookies);
- for the performance of a contract with TRIP;
- to comply with its legal or administrative obligations (e.g. tax or social security obligations and for official publications, e.g. the Belgian Official Gazette).

3. Nature of the personal data processed by TRIP

TRIP processes:

- contact details, e.g. first name, surname, title, native language, email address, telephone number, employment:
examples:
 - if you are a victim of a terrorist event;
 - if you are employed by a company affiliated to TRIP;
 - if you are somebody with whom TRIP comes into contact as part of its remit and activities;
 - if you are employed by an organisation or company having a contractual relationship with TRIP (supplier, subcontractor, etc.), in which case we will use the data to fulfil this contractual relationship;
 - specific information collected via cookies when you visit our website;
- additional information about you acquired via public sources (e.g. websites and the Belgian Official Gazette) with a view to improving or completing your personal data or keeping them up to date.

4. Processing carried out

On a day-to-day basis, TRIP carries out the following processing:

- If you are a victim of a terrorist event.
Your contact details are processed for the following purposes:
 - monitoring and control, based on anonymous global terrorism claims statistics;
 - responding to requests from the public authorities (anonymous global statistics) and the Commission for Intentional Acts of Violence, in order to avoid double compensation.
- If you are employed by a company affiliated to TRIP
Your contact details will be processed because you are a contact person for TRIP. Your data will be processed in the context of the involvement of your organisation or company in TRIP's activities and the organisation of services for members, such as communications and sending invitations to committee meetings and working group meetings.
Your contact details will also be used to notify you of TRIP activities.
- If you are somebody with whom TRIP comes into contact as part of its remit and activities
Your contact details will be processed as part of TRIP's remit to represent insurance enterprises' interests.
- If you sign up for a newsletter or one of our events
Your contact details will be processed to keep track of your registration for the purpose of sending you information (or documents).

- If you sign up for one of our events

Your contact details will be processed with a view to sending each participant a simplified list of participants, giving their first names, surnames and organisations.

- If you are employed by an organisation or company having a contractual relationship with TRIP

Your contact details will be processed for the purposes of:

- keeping track of the service provided, the order, etc. and any comments or claims in this regard;
- general customer and supplier administration, including accounting-related processing, handling of litigation and judicial proceedings, collection or transfer of claims and protection of rights in general.

- If you visit our website

Your contact details will be used to improve your browsing experience and to create anonymous site quality statistics.

- In certain cases, TRIP is legally obliged to process your personal data and/or share them with the competent authorities or with official bodies.

5. Transfer of data

With a view to protecting your data, the persons authorised to access these data are specified based on their tasks or activities within TRIP.

In certain cases, TRIP may transfer your personal data to third parties, for example to the competent authorities or bodies determined by law in the context of legal or regulatory obligations (e.g. Commission for Intentional Acts of Violence, the publication of directors' appointments in the appendices to the Belgian Official Gazette).

6. Data retention period

TRIP processes your personal data for no longer than is necessary for the purposes for which they are processed. After these purposes have been achieved, the data are deleted.

This means that the processed data are kept throughout the duration of the claims management, the professional relationship, the mission or mandate with TRIP, supplemented by any other retention period that may be required by the applicable legislation or rules and regulations.

7. Data protection

Access to your personal data is only provided to those persons for whom these data are necessary to perform their tasks in TRIP. These persons are bound by a strict duty of confidentiality and are obliged to comply with all the technical and organisational requirements imposed to ensure the security of the data.

TRIP has put in place technical arrangements to ensure the security and integrity of its infrastructure (in the broad sense) in order to, amongst other things, ensure the protection of your personal data.

8. Rights

You have the right to request information, by sending us a signed and dated letter, regarding the personal data we hold about you. TRIP will reply within a month to anybody exercising this right. If necessary, this period may be extended by two months. If such an extension is needed, TRIP will inform you of this extension and the reasons for the delay within one month.

Any such request must be accompanied by proof of your identity (double-sided copy of your identity card).

8.1 Right of access

You have the right to obtain confirmation whether personal data concerning you are being processed, and, where that is the case, access to the personal data and the following information:

- the purposes of the processing;
- the categories of data concerned;
- the categories of recipient to whom they are disclosed;
- the period for which they are being stored;
- information regarding your rights (right to request rectification, erasure, etc.) and the option of lodging a complaint with the Data Protection Authority;
- the origin of the processed data.

8.2 Right to rectification

If you discover that despite our best efforts, your data are inaccurate or incomplete, you may request that they be rectified, corrected or updated. These will only be modified after all the relevant security measures have been taken (verification of your identity and the accuracy of the requested corrections).

8.3 Right to erasure

In certain specific cases, the legislation allows you to request that your personal data be erased. This is the case in particular if:

- these data are no longer necessary in relation to the purposes for which we collected them;
- the processing of the data is exclusively based on your consent and you decide to withdraw this consent
- you have objected to the processing of your data and we have no legitimate grounds overriding your reasons for the objection.

However, your right to erasure of your personal data is not completely unconditional. Specifically, we are entitled to continue storing your data if this is necessary for reasons including:

- compliance with a legal obligation;
- fulfilment of our contractual obligations;
- establishment, exercise or defence of legal claims.

8.4 Right to restriction of processing

In certain specific cases, you may request restriction of the processing of your personal data.

This is the case in particular if:

- you contest the accuracy of personal data, for a period enabling us to verify the data;
- your data are no longer needed for the purposes of the processing, but they are required by you for the establishment, exercise or defence of legal claims.

The restriction of processing will end in the following circumstances:

- you grant your consent to us for this;
- the processing of your data is required for the establishment, exercise or defence of legal claims;
- the processing is required to protect the rights of another natural or legal person;
- the processing is required for reasons of public interest.

8.5 Right to data portability

Finally, in certain cases you have the right to have the personal data you have provided to us transmitted to you or transmitted directly by TRIP to another controller, where this proves technically feasible.

This right is applicable where the processing is based on your consent or is performed in the context of the performance of a contract between you and TRIP.

9. Contact

You can contact us in various ways if you wish to exercise your rights:

By post:	TRIP Request for personal information (confidential) Square de Meeûs 29 BE-1000 Brussels
By email:	info@tripasbl.be

TRIP will process the requests within the periods set by the GDPR.

You can also find additional information by consulting the website of the Belgian Data Protection Authority (<https://www.autoriteprotectiondonnees.be/>), with whom you can also lodge a complaint if appropriate.

10. Amendment

TRIP reserves the right to amend this policy at any time in accordance with the General Data Protection Regulation. Any amendment to this policy will be the subject of specific information in a special tab on the site www.tripasbl.be.