

Data Protection Policy

The European Federation of Building Societies takes the protection of your personal data very seriously. With the following data protection policy information, we would like to inform you about the most important aspects of data processing in the context of using our website and the rights to which you are entitled.

1. Name and contact details of the controller

The responsibility lies with the:

European Federation of Building Societies
Rue Montoyer 25
1000 Brussels, Belgium
Email: info@efbs-bausparkassen.org
Phone: +32 2 231 03 71
Fax: +32 2 230 82 45

2. Collection and storage of personal data, nature and purpose of their use

a) When visiting our website

When you visit www.efbs.org, the browser used on your device automatically sends information to the server of our website. The following information is collected and stored until automated deletion:

- IP address of the requesting computer,
- date and time of access,
- indication of the time difference between the requesting host and the web server,
- content of the request or indication of the retrieved file that was transmitted to the user,
- access status (successful transmission, error, etc.),
- amount of data transmitted in each case in bytes,
- website from which access is made (referrer URL),
- the browser, the operating system of your computer, the language of the browser and the version of the browser software.

This data is collected and processed for the purpose of enabling the use of our website (establishing a connection), ensuring system security and stability on a permanent basis and enabling the technical administration of the network infrastructure. The IP address is only evaluated in the event of attacks on our network infrastructure.

The legal basis for data processing is Art. 6 para. 1 p. 1 point f) of the General Data Protection Regulation (GDPR). Our legitimate interest follows from the data collection purposes listed above. In no case we use the data for the purpose of drawing conclusions about you; except in cases of intentional disruption of the functionality of our website or misuse of our services. Apart from these exceptions, no personal user profiles are created and the data is not passed on to third parties.

The above-mentioned data is deleted as soon as it is no longer required to achieve the purpose for which it was collected. In the case of the collection of data for the provision of the website, this is the case when the respective session has ended. The data is not stored on our web server beyond this point.

In addition, we use cookies, analysis services and other third-party services on our website. Further details can be found under no. 4 et seq of this data protection policy.

b) When using our e-mail contact address

For questions of any kind, we offer you the opportunity to contact us via the e-mail address mentioned on our website. It is necessary to provide a valid e-mail address so that we know from whom the request came from and to answer it. Further information may be provided voluntarily.

In the case of contact via e-mail, the information you provide will be stored for the purpose of processing your request.

We do not pass your data to third parties unless you give us permission to pass it on, neither will we match the data thus provided to us with data that may be collected by other components of our website.

The data processing for the purpose of contacting us is in accordance with Art. 6 para. 1 p. 1 point a) GDPR based on your voluntarily granted consent and on our legitimate interest in processing and answering your enquiry, Art. 6 para. 1 p. 1 point f) GDPR. If your enquiry is aimed at the conclusion of a contract, Art. 6 para. 1 p. point b) GDPR (fulfillment of a contract, implementation of pre-contractual measures) will be the legal basis.

The above-mentioned personal data will be deleted as soon as it is no longer required to achieve the purpose for which it were collected and the deletion does not conflict with any statutory retention and documentation obligations. For example, personal data sent by e-mail may be deleted when the respective conversation with the user has ended. A conversation is considered to have ended when the circumstances indicate that the matter in question has been conclusively clarified.

If your enquiry concerns the conclusion or fulfilment of a contract or the implementation of pre-contractual measures, legal storage and documentation obligations (from tax or commercial law) may prevent the deletion of the data. In these cases, we will only continue to store the data for these legal purposes, but will not process it in any other way and will delete it after expiry of the legal storage or documentation obligation.

c) When using the members' area of the website

Members of the European Federation of Building Societies or their representatives have the possibility on our website to log into the members' area by entering a user name and a password. In the members' area, members can access additional documents. When logging into the members' area, the website uses a random code by means of the "Page Restrict" plug-in in a session cookie to be able to assign subsequent page views to the same internet browser. This is to make it easier for our members to use the members' area. After closing the browser, this session cookie is automatically deleted.

Data processing when using the members' area is based on the consent of the members or their representatives pursuant to Art. 6 para. 1 p. 1 point a) GDPR to use the members' area and on our legitimate interest in enabling our members to use the members' area on the website, Art. 6 para. 1 p. 1 point f) GDPR.

3. Transfer of data to third parties

A transfer of your personal data to third parties for other purposes other than those listed below will not take place.

We only share your personal information with third parties

- if you have given your explicit consent according to Art. 6 para. 1 p. 1 point a) GDPR,
- if disclosure pursuant to Art. 6 para. 1 p. 1 point f) GDPR is required to exert, exercise or defend legal claims and if there is no reason to presume that you have a predominantly legitimate interest in not disclosing your data,
- in the event that disclosure pursuant to Art. 6 para. 1 p. 1 point c) GDPR is a legal obligation or
- if this is permitted by law and according to Art. 6 para. 1 p. 1 point b) GDPR is required for the settlement of contractual relations with you.

In the event that we outsource certain parts of data processing ("commissioned processing"), we contractually oblige commissioned processors to use personal data only in accordance with the requirements of data protection laws and to ensure the protection of the rights of the data subject.

4. Cookies – General explanations

We use cookies on our site. Cookies are small files that your browser automatically creates and that are stored on your device (laptop, tablet, smartphone etc.) when you visit our site. Cookies do not harm your device, do not contain viruses, Trojans or other malicious software. In the cookie, information is stored, each resulting in connection with the specific terminal used. However, this does not mean that we are immediately aware of your identity.

On the one hand, cookies help us to improve our website and to provide you with a better browsing experience. Session cookies, for instance, can recognize that you have already visited individual pages of our website. They are deleted automatically after you have left our website.

In addition, to improve usability, we also use temporary cookies that are stored on your device for a specific period of time. When you visit our website again to take advantage of our services, they will automatically recognize that you have already been with us and which specific inputs and settings you have made so that you do not need to re-enter them. This applies in particular to consents that you give via our Consent Management Tool (see no. 5).

We also use cookies in order to statistically record the use of our website and to evaluate the data thus obtained for the purpose of optimizing our service. These cookies are deleted automatically after a defined time (see no. 7).

Insofar as cookies are technically necessary, our legitimate interest in processing the personal data results from the aforementioned purposes. The legal basis is Art. 6 para. 1 p. 1 lit. f) GDPR. In all other cases, the legal basis is the consent you may have given as part of our consent management tool, Art. 6 para. 1 p. 1 point a) GDPR.

Most browsers accept cookies automatically. However, you can configure your browser in such a way that no cookies are stored on your device or a warning always appears before a new cookie is displayed. In addition, you can delete all or individual cookies stored on your computer. You can usually find these setting options of your browser under the menu item Options. However, disabling cookies completely may mean that you can not use all features of our website.

You can find out which cookies and which third-party services we use in detail in the following explanations.

5. Consent-Management-Tool Borlabs Cookie

In order to give you the opportunity to decide which cookies we may use in detail, we use the Consent Management Tool from Borlabs. This solution is used to store the consents you have given when accessing our website. If you wish to revoke these consents, simply delete the cookie in your browser. When you then re-enter/reload our website, you will be asked again for your cookie consent.

The cookie set by the solution (Borlabs cookie) is a so-called technically necessary or essential cookie. This means that the cookie enables the basic functions of the website. Without it, certain functions of the website would not be possible. Therefore, necessary cookies cannot be deselected or deactivated.

The legal basis for data processing is Art. 6 para. 1 p. 1 lit. f) GDPR. Our legitimate interest is to ensure the functionality of the website and to save the settings you have made when accessing the website.

If you do not delete the Borlabs cookie yourself in your browser, it will be automatically deleted after one year due to the limited duration of the cookie.

6. Polylang Cookie

We use the Polylang programme for the multilingualism of our website. Polylang is a product of WP SYNTAX, 28, Rue Jean Sebastien Bach, 38090 Villefontaine, France. On our website you have the possibility to choose in which language (German, English, French) the information published there should be displayed. After selecting the language, Polylang saves the selected language by setting a cookie. The cookie is set exclusively to recognise and retain the language used or selected by the user.

The cookie from Polylang is a so-called technically necessary or essential cookie. This means that the cookie enables the basic functions of the website. Without it, certain functions of the website would not be possible. The Polylang cookie can therefore not be deselected.

The legal basis for data processing is Art. 6 para. 1 p. 1 lit. f) GDPR. Our legitimate interest is to ensure the functionality of the website and to save the settings you have made when accessing the website.

The cookies from Polylang remain stored for one year and are then deleted.

You can also find more information about Polylang's data protection compliance on the Polylang website below:

<https://polylang.pro/doc/is-polylang-compatible-with-the-eu-cookie-law/>

7. Web analysis service Matomo

The web analysis service Matomo is used on our website. Matomo is a service provided by InnoCraft Ltd, 7 Waterloo Quay PO625, 6140 Wellington, New Zealand, and is used for statistical evaluation and analysis.

Matomo also uses cookies that are stored on your terminal device and enable us to analyse and evaluate your use of our website. This enables us to improve individual functions and offers on our website and to make them more interesting for you as a user.

The legal basis for the use of Matomo and the processing of the data also by the third-party provider is, on the one hand, Art. 6 para. 1 p. 1 lit. f) GDPR, whereby our legitimate interest follows from the aforementioned purposes, but primarily your consent given, if applicable, when calling up our website, with Art. 6 para. 1 p. 1 point a) GDPR.

The data is deleted as soon as it is no longer required to achieve the purpose for which it was collected. For Matomo, this is the case after 13 months.

Further information can also be found on the InnoCraft website below:

<https://matomo.org/privacy-policy/>

8. Social Media Plug-in Twitter

We are pleased when users of our website recommend and discuss content on our website. For this purpose, we have integrated a module on individual pages of our website that displays current tweets from the short message network Twitter. Twitter is a service of Twitter International Company, One Cumberland Place, Fenian Street, Dublin 2, D02 AX07 Ireland.

To ensure that the integration of the module is compatible with our ideas of data protection and privacy, your user data (your IP address, information about the terminal device you are using) is only transmitted to Twitter when you click on one of the tweets displayed or on the button "EFBS on Twitter" and are thus redirected to the Twitter website.

However, if you click on one of the tweets displayed or on the "EFBS on Twitter" button while you are already logged into your Twitter account on your end device, Twitter can associate your visit to our pages with your user account. We would like to point out that we, as the provider of the pages, have no knowledge of the content of the transmitted data or its use by Twitter.

If you do not want Twitter to associate your visit to our website with your Twitter account, you must log out of Twitter before visiting our website. If you want to completely prevent the transfer of data to Twitter, you must also refrain from clicking the Twitter buttons.

For the purpose and scope of the data collection and the further processing and use of the data by Twitter, as well as your rights in this respect and setting options for protecting your privacy, please refer to Twitter's data protection information (<https://twitter.com/privacy>).

If you are registered as a Twitter user and have a Twitter account, you can adjust your Twitter data protection settings yourself in your account. To do this, click on the following link and log in (<https://twitter.com/personalization>).

9. Your Rights

You have the right

- to request information about your personal data processed by us pursuant to Art. 15 GDPR. In particular, you can request information on the processing purposes, the category of personal data, the categories of recipients to whom your data has been disclosed, the planned retention period, the right to rectification, deletion, limitation of processing or objection, the existence of a right to complain, the source of data, if not collected by us, and the existence of automated decision-making including profiling and, where appropriate, meaningful information about their details;
- that, in case your personal data stored by us pursuant to Art. 16 GDPR are incorrect or incomplete, demand their correction without delay;
- in accordance with Art. 17 GDPR, to request the deletion of your personal data stored by us, unless the processing for the exercise of the right to freedom of expression and information, for the fulfillment of a legal obligation, for reasons of the public interest or for assertion, exercise or defense of legal rights is required;
- to demand, pursuant to Art. 18 GDPR, the restriction of the processing of your personal data, as far as the accuracy of the data is disputed by you, the processing is unlawful, but you reject its deletion and we no longer need the data, but you require them to assert, exercise or defend legal claims or you have objected to processing in accordance with Art. 21 GDPR;
- in accordance with Art. 20 GDPR, to receive your personal data provided to us in a structured, standard and machine-readable format or to request transmission to another person in charge;
- in accordance with Art. 7 (3) GDPR, to revoke your once given consent to us at any time. As a result, we are not allowed to continue the data processing based on this consent for the future and
- to complain to a supervisory authority in accordance with Art. 77 GDPR.

The supervisory authority responsible for us is:

Autorité de protection des données
Rue de la Presse 35
1000 Brussels
Belgium
Phone: +32 (0)2 274 48 00
Fax: +32 (0)2 274 48 35
Email: contact@apd-gba.be

10. Right to object

Individual right to object

If your personal data are processed on the basis of legitimate interests in accordance with Art. 6 para. 1 p. 1 point f) GDPR, you have the right to file an objection against the processing of your personal data; this also applies to profiling based on this provision within the meaning of Article 4 No. 4 of the GDPR.

In the event of an objection, we will no longer process your personal data unless we can demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms, or the processing serves to assert, exercise or defend legal claims.

Right to object to processing of data for direct marketing purposes

In individual cases, we process your personal data in order to carry out direct advertising. You have the right to object at any time to the processing of personal data concerning you for the purpose of such advertising; this also applies to profiling insofar as it is associated with such direct advertising.

If you object to processing for direct marketing purposes, we will no longer process your personal data for these purposes.

The objection can be form-free and should be addressed to info@efbs-bausparkassen.org.

11. Data Security

We make every effort to ensure the security of your data within the framework of the applicable laws and the technical possibilities.

Your personal data is transmitted in encrypted form. We use the SSL (Secure Socket Layer) coding system for this purpose when you visit our website. You can see whether an individual page of our website is transmitted in encrypted form by the closed display of the key or lock symbol in your browser line.

However, we would like to point out that data transmission on the Internet (e.g. when communicating by e-mail) can have security gaps. Complete protection of data against access by third parties is not possible.

We also take appropriate technical and organizational security measures to protect your data against accidental or intentional manipulation, partial or total loss, destruction or against unauthorized access by third parties. Our security measures are continuously improved in line with technological developments.

12. Links to other websites

On our website you may find links to the websites of other providers not affiliated with us ("third parties"). If you click on these links, we no longer have any influence on what data is collected by the third party and how the data is used. Detailed information on data collection and use can be found in the privacy policy of the respective provider.

Since data collection and processing by third parties is naturally beyond our control, we can not accept any responsibility for this.

13. Updating and changing this privacy policy

This privacy policy is currently valid and is valid as of April 2021.

As a result of the further development of our website and offers thereof or due to changed legal or official requirements, it may be necessary to change this privacy policy. The current privacy policy can be viewed at <https://www.efbs.org/data-protection> and printed by you at any time.