

# LEMUN AVG/GDPR Statement

Stichting Leiden Model United Nations

October 2018

## 1 Data protection

This Privacy Policy clarifies the nature, scope and purpose of the processing of personal data (hereinafter referred to as “Data”) within our online offering and the related websites, features and content, as well as external online presence, e.g. our social media profiles on Facebook, Instagram, Twitter and Snapchat. (collectively referred to as “online offer”). With regard to the terminology used, e.g. “Processing” or “Controller”, we refer to the definitions in Article 4 of the Algemene Verordening Gegevensbescherming (AVG) / General Data Protection Regulation (GDPR).

## 2 Controller

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the Netherlands

robbers@lemun.org

Link to the imprint: [https://www.lemun.org/wp-content/uploads/2018/10/LEMUN\\_GDPR\\_statement.pdf](https://www.lemun.org/wp-content/uploads/2018/10/LEMUN_GDPR_statement.pdf)

## 3 Types of processed data:

- Inventory data (e.g., names, addresses).
- contact information (e.g., e-mail, phone numbers).
- content data (e.g., text input, photographs, videos).
- usage data (e.g., websites visited, interest in content, access times).

- Meta / communication data (e.g., device information, IP addresses).

In some cases also the following:

- Passport photographs
- passport details
- dietary requirements
- special circumstances to be taken into account for ensuring the well-being of specific persons, including but not limited to, medicine use, psychic well-being, etc.
- for the sake of references in the context of applications for certain functions, details of performance in those or similar functions

## 4 Purpose of processing

- Provision of participation in a conference, its functions and contents.
- Answering contact requests and communicating with users.
- Safety measures.

## 5 Definitions

“GDPR” or “AVG” (hereinafter “AVG/GDPR”) means the Dutch implementation of Directive 2016/67 of the European Parliament and Council, as passed on 27 April 2016.

“Leiden Model United Nations” (hereinafter “LEMUN”)

“Personal data” means any information relating to an identified or identifiable natural person (hereinafter the “data subject”); a natural person is considered as identifiable, which can be identified directly or indirectly, in particular by means of assignment to an identifier such as a name, to an identification number, to location data, to an online identifier (e.g. cookie) or to one or more special features, that express the physical, physiological, genetic, mental, economic, cultural or social identity of this natural person.

“Processing” means any process performed with or without the aid of automated procedures or any such process associated with personal data. The term goes far and includes virtually every handling of data.

“Controller” means the natural or legal person, public authority, body or body that decides, alone or in concert with others, on the purposes and means of processing personal data.

## 6 Relevant legal bases

In accordance with Art. 13 AVG/GDPR, we inform you about the legal basis of our data processing. Unless the legal basis in the data protection declaration is mentioned, the following applies: The legal basis for obtaining consent is Article 6 (1) lit. a and Art. 7 AVG/GDPR, the legal basis for the processing for the performance of our services and the execution of contractual measures as well as the response to inquiries is Art. 6 (1) lit. b AVG/GDPR, the legal basis for processing in order to fulfill our legal obligations is Art. 6 (1) lit. c AVG/GDPR, and the legal basis for processing in order to safeguard our legitimate interests is Article 6 (1) lit. f AVG/GDPR. In the event that vital interests of the data subject or another natural person require the processing of personal data, Art. 6 para. 1 lit. d AVG/GDPR as legal basis.

## 7 Safety measures

We ask you to inform yourself regularly regarding the content of our privacy policy. We will adjust the privacy policy as soon as the changes to the data processing we make require it. We will notify you as soon as the changes require your participation (e.g. consent) or other individual notification.

## 8 Collaboration with processors and third parties

If, in the context of our processing, we disclose data to other persons and companies (contract processors or third parties), transmit them to them or otherwise grant access to the data, this will only be done on the basis of a legal permission (e.g. if a transmission of the data to third parties, as required by payment service providers, pursuant to Art. 6 (1) (b) AVG/GDPR to fulfill the contract), you have consented to a legal obligation or based on our legitimate interests (e.g. the use of agents, webhosters, etc.).

If we commission third parties to process data on the basis of a so-called “contract processing contract”, this is done on the basis of Art. 28 AVG/GDPR.

## 9 Transfers to third countries

If we process data in a third country (ie outside the European Union (EU) or the European Economic Area (EEA)) or in the context of the use of third party services or disclosure or transmission of data to third parties, this will only be done if it is to fulfill our (pre) contractual obligations, on the basis of your consent, on the basis of a legal obligation or on the basis of our legitimate interests. Subject to legal or contractual permissions, we process or have the data processed in a third country only in the presence of the special conditions of Art. 44 et seq. AVG/GDPR. That the processing is e.g. on the basis of

specific guarantees, such as the officially recognized level of data protection (eg for the US through the Privacy Shield) or compliance with officially recognized special contractual obligations (so-called “standard contractual clauses”).

## **10 Rights of data subjects**

You have the right to ask for confirmation as to whether the data in question are being processed and for information about this data as well as for further information and a copy of the data in accordance with Art. 15 AVG/GDPR.

You have, under Art. 16 AVG/GDPR, the right to demand the completion of any incomplete data concerning you or the correction of any incorrect data concerning you.

In accordance with Art. 17 AVG/GDPR, you have the right to demand that the relevant data be deleted immediately or, alternatively, to require a restriction of the processing of data in accordance with Art. 18 AVG/GDPR. This may affect your ability or opportunity to participate in LEMUN.

You have the right to demand that the data relating to you, which you have provided to us, be obtained in accordance with Art. 20 AVG/GDPR and request their transmission to other persons responsible.

You have, under Art. 77 AVG/GDPR, the right to file a complaint with the competent supervisory authority.

## **11 Right to withdraw consent**

You have the right to withdraw consent in accordance with Art. 7 para. 3 AVG/GDPR with effect for the future. This may affect your ability or opportunity to participate in LEMUN.

## **12 Right to object**

You can object to the future processing of your data in accordance with Art. 21 AVG/GDPR at any time. The objection may in particular be made against processing for direct marketing purposes.

## **13 Cookies and right to object in direct mail**

“Cookies” are small files that are stored on users’ computers. Different information can be stored within the cookies. A cookie is primarily used to store the information about a user (or the device on which the cookie is stored) during or after his visit to an online offer. Temporary cookies, or “session cookies” or “transient cookies”, are cookies that are deleted after a user leaves an online service and closes his browser. In such a cookie, e.g. the contents of a shopping cart are stored in an online store or a login jam. The term “permanent”

or “persistent” refers to cookies that remain stored even after the browser has been closed. Thus, e.g. the login status will be saved if users visit it after several days. Likewise, in such a cookie the interests of the users can be stored, which are used for range measurement or marketing purposes. A “third-party cookie” refers to cookies that are offered by providers other than the person who manages the online offer (otherwise, if it is only their cookies, this is called “first-party cookies”).

We can use temporary and permanent cookies and clarify this in the context of our privacy policy.

If users do not want cookies stored on their computer, they will be asked to disable the option in their browser’s system settings. Saved cookies can be deleted in the system settings of the browser. The exclusion of cookies can lead to functional restrictions of this online offer.

A general contradiction to the use of cookies used for online marketing purposes can be found in a variety of services, especially in the case of tracking, via the US website <http://www.aboutads.info/choices/> or the EU site <http://www.youronlinechoices.com/> be explained. Furthermore, the storage of cookies can be achieved by switching them off in the settings of the browser. Please note that not all features of this online offer may be used.

## 14 Deletion of data

The data processed by us are deleted or limited in their processing in accordance with Articles 17 and 18 AVG/GDPR. Unless explicitly stated in this privacy policy, the data stored by us are deleted as soon as they are no longer required for their purpose and the deletion does not conflict with any statutory storage requirements. Unless the data are deleted because it is required for other and legitimate purposes, its processing will be restricted. The data are blocked and not processed for other purposes. This applies, for example for data that must be kept for commercial or tax reasons.

According to legal requirements in the Netherlands, the storage takes place in particular for 7 years pursuant to article 8.86 of the Belastingwet (BES) (trading books, inventories, opening balance sheets, annual accounts, trade letters, accounting documents, etc.) and for 10 years in accordance with article 8.86 BES (real estate, digital services, etc.).

## 15 Hosting

The hosting services we use are for the purpose of providing the following services: infrastructure and platform services, computing capacity, storage and database services, security and technical maintenance services we use to operate this online service.

Here we, or our hosting provider, process inventory data, contact data, content data, contract data, usage data, meta and communication data of cus-

tomers, interested parties and visitors to this online offer on the basis of our legitimate interests in an efficient and secure provision of this online offer acc. Art. 6 para. 1 lit. f AVG/GDPR i.V.m. Art. 28 AVG/GDPR (conclusion of contract processing contract).

## **16 Collection of access data and log files**

We, or our hosting provider, collects on the basis of our legitimate interests within the meaning of Art. 6 para. 1 lit. f. AVG/GDPR Data on every access to the server on which this service is located (so-called server log files). The access data include name of the retrieved web page, file, date and time of retrieval, amount of data transferred, message about successful retrieval, browser type and version, the user's operating system, referrer URL (the previously visited page), IP address and the requesting provider ,

Logfile information is stored for security purposes (for example, to investigate abusive or fraudulent activities) for a maximum of 7 days and then deleted. Data whose further retention is required for evidential purposes shall be exempted from the cancellation until final clarification of the incident.

## **17 Provision of our statutory and business services**

We process the data of our members, supporters, prospects, customers or other persons in accordance with Art. 6 para. 1 lit. b. AVG/GDPR, if we offer them contractual services or in the context of an existing business relationship, e.g. members, or are themselves recipients of benefits and benefits. Incidentally, we process the data of affected persons in accordance with. Art. 6 para. 1 lit. f. AVG/GDPR based on our legitimate interests, e.g. when it comes to administrative tasks or public relations.

The data processed, the nature, scope and purpose and necessity of their processing are determined by the underlying contractual relationship. This includes in principle inventory and master data of the persons (e.g., name, address, etc.), as well as the contact data (e.g., e-mail address, telephone, etc.), the contract data (e.g., services used, communicated contents and Information, names of contact persons) and if we offer paid services or products, payment data (e.g., bank details, payment history, etc.).

We delete data that is no longer required to serve our statutory and business purposes. This is determined according to the respective tasks and contractual relationships. In the case of business processing, we retain the data for as long as they may be relevant to the transaction, as well as with regard to any warranty or liability obligations. The necessity of keeping the data are checked every three years; otherwise the statutory storage obligations apply.

## **18 Administration, financial accounting, office organization, contact management**

We process data in the context of administrative tasks and organization of our business, financial accounting and compliance with legal obligations, such as archiving. We process the same data that we process in the course of rendering our contractual services. The processing principles are Art. 6 para. 1 lit. c. AVG/GDPR, Art. 6 para. 1 lit. f. AVG/GDPR. The processing affects customers, prospects, business partners and website visitors. The purpose and interest in processing lies in administration, financial accounting, office organization, data archiving, that is, tasks that serve to maintain our business, perform our duties and provide our services. The deletion of the data in terms of contractual performance and contractual communication corresponds to the information provided in these processing activities.

We disclose or transmit financial data, but no personal data, to the sponsors, financial administration, consultants, such as tax accountants or auditors, and other fee agents and payment service providers.

Furthermore, based on our business interests, we store information about suppliers, promoters, sponsors and other business partners, e.g. for later contact. We generally store this majority of company-related data permanently.

## **19 Contact**

When contacting us (for example, by contact form, e-mail, telephone or via social media) the information of the user to process the contact request and its processing in accordance with Art. 6 para. 1 lit. b) AVG/GDPR processed. User information can be stored in a Customer Relationship Management System (“CRM System”) or comparable request organization.

We delete the requests, if they are no longer required. We check the necessity every two years; Furthermore, the legal archiving obligations apply.

## **20 Jetpack (WordPress Stats)**

Based on our legitimate interests (ie interest in the analysis, optimization and economic operation of our online offer within the meaning of Art. 6 (1) lit. AVG/GDPR) we use the plugin Jetpack (here the subfunction “WordPress Stats”), which includes Includes Visitor Access Statistical Evaluation Tool and Automattic Inc., 60 29th Street No. 343, San Francisco, CA 94110, USA. Jetpack uses so-called “cookies”, text files that are stored on your computer and that allow an analysis of the use of the website by you.

Automattic is certified under the Privacy Shield Agreement, which provides a guarantee to comply with European privacy legislation (<https://www.privacyshield.gov/participant?id=a2zt0000000CbqcAAC&status=Active>).

The information generated by the cookie about your use of this online offer is stored on a server in the USA. Here, user profiles of the users can be created from the processed data, these being used only for analysis and not for advertising purposes. For more information, see the Automattic Privacy Policy: <https://automattic.com/privacy/> and Jetpack Cookies: <https://jetpack.com/support/cookies/>.

## 21 Facebook Pixels, Custom Audiences and Facebook Conversion

Within our online offer is due to our legitimate interests in analysis, optimization and economic operation of our online offer and for these purposes, the so-called “Facebook pixel” of the social network Facebook, by Facebook Inc., 1 Hacker Way, Menlo Park, CA 94025 , USA, or, if you are located in the EU, Facebook Ireland Ltd., 4 Grand Canal Square, Grand Canal Harbor, Dublin 2, Ireland (“Facebook”).

Facebook is certified under the Privacy Shield Agreement, which provides a guarantee to comply with European privacy legislation (<https://www.privacyshield.gov/participant?id=a2zt0000000GnywAAC&status=Active>).

With the help of the Facebook pixel, it is on the one hand possible for Facebook to determine the visitors to our online offer as a target group for the display of advertisements (so-called “Facebook ads”). Accordingly, we use the Facebook Pixel to display the Facebook Ads we have been sent only to those Facebook users who have shown an interest in our online offer or who have certain features (eg interests in certain topics or products visited by them) Web pages determined), which we transmit to Facebook (so-called “Custom Audiences”). With the help of the Facebook pixel, we also want to make sure that our Facebook ads are in line with the potential interest of users and are not annoying. With the help of the Facebook pixel we can also understand the effectiveness of the Facebook ads for statistical and market research purposes, in which we see whether users were redirected to our website after clicking on a Facebook ad (so-called “conversion”).

The processing of the data by Facebook is part of Facebook’s data usage policy. Accordingly, general notes on how to display Facebook Ads, in Facebook’s Data Usage Policy: <https://www.facebook.com/policy.php>. For specific information and details about the Facebook Pixel and how it works, visit the help section of Facebook: <https://www.facebook.com/business/help/651294705016616>.

You may object to the capture by the Facebook Pixel and use of your data to display Facebook Ads. To set which types of ads you see within Facebook, you can go to the page set up by Facebook and follow the instructions for the usage-based advertising settings: <https://www.facebook.com/settings?tab=ads>. The settings are platform independent, i. they are adopted for all devices, such as desktop computers or mobile devices.

You can also use the Cookies for distance measurement and promotional purposes via the deactivation page of the Network Advertising Initiative (<http://optout.networkadvertising.org/>) and in addition the US website (<http://www.aboutads.info/choices>) or the European website (<http://www.youronlinechoices.com/uk/your-ad-choices/>). Integration of services and contents of third parties

Based on our legitimate interests (ie interest in the analysis, optimization and economic operation of our online offer within the meaning of Art. 6 (1) lit. AVG/GDPR), we make use of content or services offered by third-party providers in order to provide their content and services Services, such as Include videos or fonts (collectively referred to as “content”).

This always presupposes that the third-party providers of this content perceive the IP address of the users, since they could not send the content to their browser without the IP address. The IP address is therefore required for the presentation of this content. We endeavor to use only content whose respective providers use the IP address solely for the delivery of the content. Third parties may also use so-called pixel tags (invisible graphics, also referred to as “web beacons”) for statistical or marketing purposes. The “pixel tags” can be used to evaluate information such as visitor traffic on the pages of this website. The pseudonymous information may also be stored in cookies on the user’s device and may include, but is not limited to, technical information about the browser and operating system, referring web pages, visit time, and other information regarding the use of our online offer.

## 22 Vimeo

We can embed the videos of the Vimeo platform of Vimeo Inc., Attention: Legal Department, 555 West 18th Street New York, New York 10011, USA. Privacy Policy: <https://vimeo.com/privacy>. We point out that Vimeo can use Google Analytics and refer to the privacy policy (<https://www.google.com/policies/privacy>) and opt-out options for Google Analytics (<http://tools.google.com/dlpage/gaoptout?hl=NL>) or Google’s data usage settings for marketing purposes (<https://adssettings.google.com/>).

## 23 Youtube

We embed the videos on the YouTube platform of Google LLC, 1600 Amphitheater Parkway, Mountain View, CA 94043, USA. Privacy Policy: <https://www.google.com/policies/privacy/>, opt-out: <https://adssettings.google.com/authenticated>.

## 24 Google

We store certain files on Google Drive service, send certain information by Google Mail (gmail) service and include maps from the Google Maps service, all provided by Google LLC, 1600 Amphitheater Parkway, Mountain View, CA 94043, USA. The processed data may include, in particular, users' IP addresses and location data, but these are not collected without their consent (usually as part of the settings of their mobile devices). The data can be processed in the USA. Privacy Policy: <https://www.google.com/policies/privacy/>, opt-out: <https://adssettings.google.com/authenticated>.