

# PRIVACY POLICY

The **ROMA FOUNDATION FOR EUROPE (RFE)** complies with current privacy legislation in this area. You can read below what this means in practice.

## HOW DOES THE RFE COLLECT PERSONAL DATA?

The RFE only collects personal data that you yourself give us or that are communicated to us by a third party, in the context of a service requested (e.g. for an application form).

## WHAT PERSONAL DATA DOES THE RFE PROCESS?

The RFE only collects the personal data needed to carry out a service requested by you (or by a third party).

Depending on the service that you request from the RFE, we collect different types of personal data, which are, of course, always limited to what is strictly necessary. For the services requested from the RFE that are listed below, we need the following data in order to provide you with an appropriate service:

- to register for an event:  
surname/first name/e-mail/street/house number/postcode/municipality;
- to order a publication:  
surname/first name/e-mail/street/house number/postcode/municipality;
- to make a donation online:  
amount/surname/first name/e-mail/street/house number/postcode/municipality, and (via our payment partner Ingenico) bank card or credit card number/expiry date/bank card holder;  
Through our payment partner Ingenico: debit card number or credit card number/expiry date/cardholder's name.
- to subscribe to general or themed e-news:  
e-mail address;
- to subscribe to a Facebook (Meta) Messenger channel:
  - surname/first name,
  - PSID (page-scoped user ID) assigned to the data subject automatically by Meta upon voluntary subscription,
  - optionally, only with explicit double consent: e-mail and / or mobile number,
  - any further information voluntarily inputted by the data subject while answering questions on the platform,
  - any further button interactions voluntarily answered while replying to quick reply questions on the platform;
- to submit an application form:
  - information about the project: content/timing/budget;
  - information about the organisation: name/date of incorporation/national registration number/telephone number/legal status/address of registered office;
  - financial information: name of bank/IBAN bank account number/BIC code;

- information about the contact person for the organisation: title/surname/first name/e-mail;
- information about the person responsible for the project: title/surname/first name/e-mail.

## **WHEN AND WHY DOES THE RFE PROCESS PERSONAL DATA?**

The RFE collects and processes your data in order to provide the services you request.

If you create an account on our website, your data will automatically appear in the relevant places if you subsequently make use of another RFE service.

The RFE only processes these data in certain situations:

- if you have explicitly given your permission for us to do so; or
- if it is necessary to process the data in order to provide a service you have requested (e.g. your address in order for us to send a publication, or your bank account number for us to pay financial support); or
- if we are legally obliged to process the data (e.g. your national registration number in order to issue a tax certificate); or
- if it is necessary in the public interest or for a legitimate purpose (e.g. publication on our website of those organisations and people who have received financial support from us).

## **HOW DOES THE RFE MANAGE PERSONAL DATA?**

Data about people who are minors and sensitive personal data (e.g. health information and bank account numbers) are always treated as confidential and never made public.

Your data are only used for the service you have requested (unless the conditions described in the paragraph above are met). If, for instance, you subscribe to one or more e-news, we only use your details to send you these newsletters. Each e-news also gives you the opportunity to unsubscribe.

We never pass on your contact details to third parties for commercial purposes.

We do not sell any personal data to third parties, nor do we pass on data to third parties.

We ensure that any transfer of personal data to partner countries within the Roma Foundation alliance (e.g. in relation to donations, e-news, e-mails etc.) is conducted in compliance with the appropriate guarantees.

Our website makes use of social media plugins to enable you to access our social media channels and to enable you to share content on your own social networks. These social media channels are Facebook, Instagram, LinkedIn, Tiktok, Twitter and YouTube. When you click on any of these links, the social media service provider may collect personal data about you, such as information about your profile.

We cannot guarantee how these social media may use your personal data. In such instances it is they (each social media) who act as the controller of personal data. Each social network provides information regarding its privacy policy:

[Facebook: privacy policy](#)

[Instagram: privacy policy](#)

[LinkedIn: privacy policy](#)

[Tiktok: privacy policy](#)

[Twitter: privacy policy](#)

[YouTube: privacy policy](#)

## **HOW LONG DOES THE RFE KEEP PERSONAL DATA?**

The RFE undertakes to keep your data for no longer than is necessary for the service for which we collected the data:

- for newsletter subscription, Messenger channel subscription and petition signatures without a time limit;
- for registration for an event: only for monitoring the event itself (and subsequently sending a publication about the event), for two years;
- for online donations: for one year (until delivery of the tax certificate);
- for ordering publications: for one year.

The RFE may also decide to collect some data in an aggregated form over a longer period in order to evaluate and make adjustments to its own activities (e.g. support paid out over the years). However, in this instance, no individual identification is made.

You always have the right to withdraw your consent. In the event that you do withdraw your consent or you object to the use of your personal data, and such objection is accepted, we will remove your personal data from our databases. Please note, however, that we will retain the personal data necessary in order to respect your preferences in the future.

## **DOES THE RFE KEEP MY PERSONAL DATA SAFE?**

Your personal data are processed safely. This is why we use various security technologies and measures to protect your data from all unauthorised access, use, loss or publication. Where appropriate, these technologies and measures are regularly tested and updated.

In order to protect our internet sites and all the other servers, the RFE works with a specialised security partner.

If, nevertheless, an incident arose involving your data, you would be personally informed of this, in line with current legal requirements.

The number of employees who have access to your data is very limited. Access to your personal data is only given to these carefully selected employees, if and when they need such information in order to carry out their work to enable the services you have requested to be provided.

RFE procures its suppliers who may have direct access to your personal data carefully, and the suppliers comply with all relevant legal requirements, including data & privacy regulations and internal security measures and processes. RFE contracted its data processing suppliers in a way that it limits the access of the team members of the suppliers to the minimum who may have direct access to your personal data processed under this Privacy Policy.

RFE's suppliers who may process personal data regulated under this privacy policy use third party data processors and sub-processors who process your data in harmony with the relevant data protection regulations. These third-party data processors may synchronise your data between the systems utilised, may send emails, Facebook Messenger messages, register & store data, may validate e-mail addresses, may also process online payments, and may process interactions with the public API's of social media platforms, like Facebook and others. Upon direct inquiry sent to [privacy@romaforeurope.org](mailto:privacy@romaforeurope.org), [RFE provides detailed information about the data sub-processors used by its systems while processing your personal data.](#)

RFE informs you that Action Network, the CRM, emailer and action page software that it licenses does process data outside of the EU / EEA area but this third country data processing meets the legal requirements of the present EU-USA Data Privacy Agreement.

When we do share personal data with external parties (e.g. when making an online donation), a processing agreement is concluded that always ensures that there are (adequate) technical measures to guarantee the security of your data.

## **WHAT CAN I DO MYSELF ABOUT MY OWN PERSONAL DATA?**

You have the right to be 'forgotten'. To request this, please contact [privacy@romaforeurope.org](mailto:privacy@romaforeurope.org)

You can, at any moment, view any of your personal data that are processed by the RFE and, if necessary correct, limit, transfer or delete any incorrect or incomplete data.

If you consider that your data have been handled incorrectly, you can submit a complaint to the Privacy Commission, Rue de la Press 35, 1000 Brussels ([contact@apd-gba.be](mailto:contact@apd-gba.be)).

## **AMENDMENTS TO OUR PRIVACY POLICY**

We have the right to modify this privacy policy from time to time. You can consult the most recent version of our privacy policy on our website.

## **COOKIE POLICY**

The RFE uses cookies to make your browsing experience on our website easier and more pleasant and to better match the content to your needs and preferences.

## **IF YOU HAVE ANY FURTHER QUESTIONS OR CONCERNS**

Contact us via [privacy@romaforeurope.org](mailto:privacy@romaforeurope.org)

# COOKIE POLICY

The ROMA FOUNDATION FOR EUROPE uses cookies to make your browsing experience easier and more pleasant and also to better tailor the content of its website to your needs and preferences. We are considered as the data controller for the personal data we gather through your use of our website.

On this page, you can find more information about:

- the types of cookies that we use
- the cookies that our service providers use
- how you can manage and block these cookies.

If you have any questions, comments or complaints regarding this cookie policy, or our use of cookies, or if you would like to revoke your consent, you can contact us by e-mail at [privacy@romaforeurope.org](mailto:privacy@romaforeurope.org)

This cookie policy was last revised on January 1st, 2024.

## WHAT ARE COOKIES?

Cookies are small data files or pieces of text that are stored by your browser on your computer, laptop or mobile device when you visit a website or certain pages of a website. The cookie allows that website to “remember” your actions or preferences over a certain period of time and then to apply them during subsequent visits (a typical example would be your preferred language).

Cookies usually contain the name of the website where the cookie has come from, the time during which the cookie will remain on your device (its expiry date), and a value, which is usually a randomly generated unique number.

A distinction is made between **strictly necessary cookies** and **other cookies**.

Strictly necessary cookies are needed for the proper functioning of the website, such as the security of our website and its accessibility. It is not a legal obligation to ask for your consent to use these cookies.

A further distinction on the basis of category can be made according to the specific purpose of the cookie. For each of these categories (apart from those that are strictly necessary), we will ask for your consent.

Cookies can be divided into the following categories:

- **Permanent cookies and session cookies:** the task of a permanent cookie is to recognise the web browser with a view to repeat visits to the website, while the task of a session cookie is to recognise the web browser during the visit to the website. Permanent cookies remain stored on your computer or mobile device from one search session to another, while session cookies are deleted at the end of every session.

- **First party cookies and third party cookies:** first party cookies are set by our website. Third party cookies are set by websites other than ours. This is what happens when our website contains elements from other websites, such as social media plug-ins and advertisements that are put on our website.
- **Performance cookies and functional cookies:** performance cookies monitor how you use the website. They enable the website manager to adjust and optimise the content and ease of use of the website (for example, how many people have visited the website's various pages and which language is the most popular). Functional cookies are cookies that remember your preferences when you visit the website (such as your chosen language), and make the website more user-friendly, and enhance your user experience.

Cookies will not always contain personal data but they may contain information that may lead to your identification. In this case, the cookie will be treated as personal data. Insofar as a cookie can be considered as personal data, our privacy policy will apply.

## WHICH COOKIES DO WE USE?

- **Strictly necessary cookies:** these are required for the operation of our website. They include, for example, cookies that enable you to log in. No consent for these cookies is required.
- **Other cookies:** these cookies can be divided into several categories, as mentioned earlier. For these cookies, your consent is required.

Name	Time-to-life	Categorie	Necessary	Description
language	1y	functional	yes	Cookie used to remember the selected language.
cookie-agreed	3.3m	functional	yes	Checks how the user agreed or has disagreed with the cookie policy.
cookie-agreed-version	3.3m	functional	yes	Cookie agreed version cookie. Updates if out of date.
cookie-agreed-categories	3.3m	functional	yes	Checks which categories of cookies the user agreed to.
_gid	1d	Statistics	no	This period shows the length of the period at which a service can store and/or read certain data from your computer by using a cookie, a pixel, an API, cookieless tracking, or other resources.
_gat_gtag_UA_1732020_1	1h	Marketing/Tracking	no	This period shows the length of the period at which a service can store and/or read certain data from your computer by

				using a cookie, a pixel, an API, cookieless tracking, or other resources.
_ga	2y	Tracking	no	Is used to identify users.

## COOKIES USED BY OUR PARTNERS

Our website makes use of **social media plugins**. These social media partners are Facebook, Instagram, LinkedIn, Twitter and YouTube. They use third party cookies. Each social media organisation provides information relating to their privacy policy.

[Facebook: privacy policy](#)

[Instagram: privacy policy](#)

[LinkedIn: privacy policy](#)

[Tiktok: privacy policy](#)

[Twitter: privacy policy](#)

[YouTube: privacy policy](#)

## MANAGING AND BLOCKING COOKIES

When visiting our website, you are informed (through a pop-up) about which cookies we are using and we will ask for your consent for the use of each of the cookies. You can at all times manage or delete cookies using the settings on your internet browser, except for the strictly necessary cookies because these cookies are essential for the visitor to browse our website and its functions. Turning off cookies will limit the service that we are able to provide and may affect your user experience. Deleting cookies may mean that you have to manually adjust your preferences each time you visit our website.

Each browser has its own information regarding the management and/or deletion of cookies:

[Chrome: manage and delete cookies](#)

[Safari: manage and delete cookies](#)

[Internet Explorer: manage and delete cookies](#)

[Firefox: manage and delete cookies](#)

[Opera: manage and delete cookies](#)

[Microsoft Edge: manage and delete cookies](#)

## AMENDMENTS TO OUR COOKIE POLICY

We reserve the right to make amendments to this cookie policy. The most recent version of our cookie policy can be consulted on our website.