

## RECLAIM Privacy Policy

### Name and contact details of the controller.

This privacy policy applies to data processing by the following controller:

RECLAIM asbl  
Avenue des Arts 7/8  
1210 Brussels, Belgium  
Email: [info@reclaiming.eu](mailto:info@reclaiming.eu)  
Phone: +32 488 2989 26  
(hereinafter "we"/"us")

### 1. Collection and retention of personal data as well as type and purpose of their use

When you access our website, [www.reclaiming.eu](http://www.reclaiming.eu), the browser used on your terminal device automatically sends information to our website's server. Such information is temporarily stored in a so-called log file. In the course of this procedure, the following information is captured and stored, without any action on your part, until it is automatically deleted:

- IP address of the requesting computer,
- date and time of access,
- name and URL of the retrieved file,
- website from which access takes place (referrer URL) and
- browser used and, where appropriate, your computer's operating system and the name of your access provider.

The indicated data are processed by us for the following purposes:

- ensuring the establishment of a smooth connection to the website,
- ensuring comfortable use of our website,
- evaluating system security and stability, and other administrative purposes.

The legal basis for data processing is Art. 6 (1), sentence 1, point (f) of the General Data Protection Regulation (EU 2016/679) (hereafter "the GDPR"). Our legitimate interest follows from the purposes of data collection listed above. In no case do we use the collected data for the purpose of drawing conclusions concerning your person.

When you visit our website, moreover, we use cookies and analytical services. Please refer to Sections 7 and 8 of this privacy policy for more information.

### 2. Email contact

Should you have questions of any kind, we offer you the possibility of contacting us by email at [info@reclaiming.eu](mailto:info@reclaiming.eu). This requires using a valid email address and providing your name so that we know who the source of the inquiry is and so that we can respond to it. Further information can be provided voluntarily.

The data processing for the purpose of contacting us takes place under Art. 6 (1), sentence 1, point (a) of the GDPR on the basis of your voluntarily given consent.

The personal data collected by us when you contact us are automatically deleted after your inquiry has been handled.

### 3. Volunteering and “GET IN TOUCH” form

In our website, you can find a “GET IN TOUCH” form (hereafter “the contact form”). The contact form offers you the possibility to inform us of your willingness to collaborate with us through an unsolicited application. The contact form requires you to provide the following information: name and surname, email, phone number and link to your LinkedIn profile or other online CV.

The data processing for the purpose of contacting us takes place under Art. 6 (1), sentence 1, point (a) of the GDPR on the basis of your voluntarily given consent.

The data you provide will be used for the sole purpose of assessing your suitability for a working collaboration with us.

### 4. Complaint form

In our website, you can find a complaint form. The complaint form offers you the possibility to inform us on any positive or negative feeling you might have on our work.

The complaint form requires you to provide the following information: name and surname, email, phone number and address.

The data processing for the purpose of contacting us takes place under Art. 6 (1), sentence 1, point (a) of the GDPR on the basis of your voluntarily given consent.

The data you provide will be used for the sole purpose of analyzing your complaint. We require your contact details in order to be able to contact you to ask for further information.

### 5. EU Law Helpdesk

Through our EU Law Helpdesk, we offer NGOs and civil society organisations with free legal advice on how to use EU law to prevent rule of law and fundamental rights backsliding in the Member States.

When you make a request to our EU Law Helpdesk, you provide us with information about you (name and surname, email address and phone number) and your case. The information on your case may include special categories of personal data as listed in Art. 9(1) GDPR, which is why, following Art.9(2)(a) GDPR, we require explicit consent to their processing once you fill in our form.

The data processing for the purpose of providing you with legal advice takes place under Art. 6 (1), sentence 1, point (a) of the GDPR on the basis of your voluntarily given consent.

The data you provide will be processed for the sole purpose of providing you with legal advice. We would gather your consent again before processing your data for the carrying out advocacy campaigns or for publishing content on our website or other media.

### 6. Disclosure of data

Your personal data are not transmitted to third parties for any purposes other than those specified in the following.

We disclose your personal data to third parties only if:

- you have granted your express consent to that under Art. 6 (1), sentence 1, point (a) of the GDPR

- the disclosure is necessary under Art. 6 (1), sentence 1, point (f) of the GDPR for the establishment, exercise or defence of legal claims and there is no reason to consider that you have an overriding legitimate interest in the nondisclosure of your data,
- there is a legal obligation to disclose under Art. 6 (1), sentence 1, point (c) of the GDPR, and disclosure is permitted by law and necessary for the execution of contractual relations with you under Art. 6 (1), sentence 1, point (b) of the GDPR.

Your data will be accessible only to RECLAIM staff and contractors and used within the network with trusted partners only specifically for the purposes of managing our activities, providing you with the services and running the platforms that you register for.

## 7. Cookies

We use cookies on our website. Cookies are small files that your browser automatically generates that are stored on your terminal device (laptop, tablet, smartphone or similar) when you visit our website. Cookies are not harmful to your terminal device and contain no viruses, Trojan horses, or other malware.

The cookie contains information about the specific terminal device in use. However, this does not mean that we directly gain knowledge of your identity through cookies.

The purpose of cookies is, on the one hand, to make your use of our product offerings more pleasant.

We use so-called session cookies to detect whether you have previously visited individual pages on our website. Such cookies are automatically deleted after you leave our website.

In order to optimise user-friendliness, we also use temporary cookies, which are stored on your terminal device for a specific defined time. If you visit our website again in order to make use of our services, the fact that you were there previously is automatically recognised, together with your entries and settings, thus avoiding the need to re-enter them.

On the other hand, we use cookies in order to track statistics on the use of our website and optimise our product offerings for you (see Section 6). When you return to our website, these cookies allow us to automatically recognise that you were there previously. Such cookies are automatically deleted after a defined time.

The data processed by cookies are necessary for the indicated purposes of our legitimate interests or those of third parties under Art. 6 (1), sentence 1, point (f) of the GDPR.

Most browsers accept cookies automatically. However, you can configure your browser not to retain cookies on your computer or to always have a prompt appear before a new cookie is stored. Fully deactivating cookies could, however, mean that you are unable to use all of our website's functions.

## 8. Analytical/tracking tools

The tracking measures that we use as indicated in the following are carried out on the basis of Art. 6 (1), sentence 1, point (f) of the GDPR. The intention behind our use of these tracking measures is to ensure that our website is designed in keeping with the users' needs and can be continually optimised.

On the other hand, we use tracking measures to track statistics on the use of our website and to evaluate the website for purposes of optimising our product offerings. These interests must be regarded as legitimate within the meaning of the above provision.

The respective data processing purposes and data categories can be inferred from the corresponding tracking tools.

## 9. Google Analytics

For purposes of needs-based design and continuous optimization of our pages, we use Google Analytics, a web analysis service of Google Inc. (<https://www.google.com/intl/de/analytics/>) (1600 Amphitheatre Parkway, Mountain View, CA 94043, USA; hereinafter "Google"). Pseudonymized use profiles are generated and cookies (see Section 5) are used in this context. The information about your use of our website or our mobile apps generated by the cookie, such as:

- Browser type/version,
- Operating system used,
- Referrer URL (previously visited page),
- Host name of accessing computer (IP address),
- Time of server query

The data is sent to a Google server in the USA and stored there. The information is used to analyse the use of our website or our mobile apps, to compile reports about website activities, and to perform other services related to website use and Internet use for purposes of market research and needs-based design of our website or our mobile apps. This information may also be sent to third parties if required by law or if third parties are processing this data on a contract basis. Under no circumstances will your IP address be linked to other Google data. IP addresses are anonymized to make association impossible (IP masking).

You can prevent cookies from being installed by disabling the corresponding setting in your browser software; however, we advise that in this case the full functionality of our website may not be able to be used.

You can also prevent the collection of the data generated by the cookie about your use of our website (including your IP address) and the processing of this data by Google by downloading and installing a browser add-on (<https://tools.google.com/dlpage/gaoptout?hl=de>). As an alternative to the browser add-on, especially for browsers on mobile end devices, you can also prevent collection by Google Analytics. An opt-out cookie is placed that prevents the future collection of your data when visiting our website. The opt-out cookie is only active in this browser and only for our website and is stored on your device. If you delete cookies on this browser, you must replace the opt-out cookie. You can find further information about data privacy in relation to Google Analytics in Google Analytics Help (<https://support.google.com/analytics/answer/6004245?hl=de>).

## 10. Social media plugins

Based on Art. 6 (1), sentence 1, point (f) of the GDPR, we use so-called social plugins ("Plugin") of the social networks Twitter and LinkedIn on our website to make our firm better known by those means. The underlying promotional purpose must be regarded as a legitimate interest within the meaning of the GDPR. The responsibility for operating in conformity with data protection requirements must be borne by the respective providers. We integrate these Plugins using the so-called two-click method in order to offer our website visitors the best possible protection.

### Twitter

Plugins of the Twitter Inc. short message network ("Twitter") are integrated into our website. The Twitter Plugins (tweet button) can be recognised by the Twitter logo on our website. Information about tweet buttons can be found here (<https://about.twitter.com/resources/buttons>).

When you access a page of our website containing such a Plugin, a direct connection between your browser and the Twitter server is established. In this way, Twitter receives the information that you have visited our website with your IP address. If you click on the Twitter "tweet button" while you are logged into your Twitter account, you can link the contents of our pages to your Twitter profile. Through this, Twitter can assign the visit on our pages to your user account. Please note that as provider of the pages we have no knowledge of the contents of the transmitted data or of their use by Twitter.

If you do not want Twitter to assign the visit on our pages, please log out of your Twitter user account. Further information can be found in the Twitter privacy policy (<https://twitter.com/privacy>).

## LinkedIn

The “LinkedIn-Share-Button” is used on our website. These are Plugins of the social network LinkedIn of LinkedIn Corporation, 2029 Stierlin Court, Mountain View, CA 94043, USA (“LinkedIn”). You can recognize the LinkedIn Plugins by the LinkedIn logo or the “Share” button on this website. When you visit this website, the Plugin establishes a direct connection between your browser and the LinkedIn server. LinkedIn receives the information that you have visited this website with your IP address. If you click the LinkedIn “Share-Button” while logged into your LinkedIn account, you can link the contents of this website on your LinkedIn profile. This allows LinkedIn to associate your visit to this website with your user account. We would like to point out that, as the provider of this website, we have no knowledge of the content of the data transmitted or of their use by LinkedIn. Details on data collection (purpose, scope, further processing, use) as well as your rights and setting options can be found in LinkedIn’s data protection information. This information is available at [http://www.linkedin.com/static?key=privacy\\_policy&trk=hb\\_ft\\_priv](http://www.linkedin.com/static?key=privacy_policy&trk=hb_ft_priv).

## 11. Rights of data subjects

You have the right:

- to obtain, pursuant to Art. 15 of the GDPR, information about your personal data that are being processed by us. In particular, you can request information about the purposes of the processing, the category of the personal data, the categories of recipients to which your data have been or will be disclosed, the envisaged storage time, the existence of the right to rectification, erasure, restriction of processing or objection, the existence of the right to lodge a complaint, the source of their [sic] data in the case of data not collected by us, and the existence of automated decision-making, including profiling, and where applicable meaningful information about the particulars thereof;
- to obtain, pursuant to Art. 16 of the GDPR, without undue delay the rectification of inaccurate personal data stored by us or to have incomplete personal data completed;
- to obtain, pursuant to Art. 17 of the GDPR, the erasure of your personal data stored by us, if the processing is no longer necessary for exercising the right of freedom of expression and information, for compliance with a legal obligation, on the grounds of public interest or for the establishment, exercise or defence of legal claims;
- to obtain, pursuant to Art. 18 of the GDPR, the restriction of processing of your personal data, if the accuracy of the data is contested by you, the processing is unlawful but you oppose their erasure and we no longer need the data but they are required by you for the establishment, exercise or defence of legal claims or you have objected to processing pursuant to Art. 21 of the GDPR;
- to receive, pursuant to Art. 20 of the GDPR, your personal data that you have provided to us in a structured, commonly used and machine-readable format or to obtain transmission to another controller;
- to withdraw at any time, pursuant to Art. 7 (3) of the GDPR, your consent granted to us. This means that from that time on we are no longer allowed to continue the data processing based on that consent and
- to lodge a complaint with a supervisory authority pursuant to Art. 77 of the GDPR. As a rule, you can do so with the supervisory authority in your habitual residence or place of work or where our firm has its registered office.

## 12. Right to object

If your personal data are processed on the basis of legitimate interests pursuant to Art. 6 (1), sentence 1, point (f) of the GDPR, you have the right, pursuant to Art. 21 of the GDPR, to object to the processing of your personal data if there are grounds for doing so relating to your particular situation or the objection relates to direct marketing. In the latter case, you have a general right to object, which is implemented by us without specification of a particular situation. Your right to withdraw or object may be exercised by sending an email to [info@reclaiming.eu](mailto:info@reclaiming.eu).

## 13. Data security

We apply appropriate technical and organisational measures to protect your data against accidental or deliberate manipulation, partial or complete loss, destruction or unauthorised third-party access. Our safety measures are continually improved in keeping with technological advances.

## 14. Status of and changes in this privacy policy

This privacy policy is up to date as of March 2024.

Enhancements in our website and product offerings or changes in statutory or regulatory requirements can make it necessary to amend this privacy policy.

You can always access and print out the current privacy statement that is in effect at any given time.