

# "La Grande Famille de Procida & Ischia"

## DATA PROTECTION POLICY

Version 1.0 of 1<sup>st</sup> September 2018

### 1. Introduction

The Association "*La Grande Famille de Procida & Ischia*" is an international genealogy organization. The Association's key aim is the preservation of archives on the islands of Procida and Ischia, located in the Bay of Naples, Italy. It is a non-profit association registered in France and governed by the French Law of 1 July 1901.

For further information regarding the services offered by the Association please refer to the General Conditions of Use published on the Association's website.

The Association "*La Grande Famille de Procida & Ischia*" complies with all French and European regulatory and legislative provisions relating to the protection of personal data.

The Association enforces a strict policy to ensure the protection of personal data:

- Each user of the Association's services retains authority over his/her data, the Association is limited in how it can use this data;
- Data is treated in a transparent, confidential and secure manner;
- The Association is engaged in a continuous process of protecting users' data, in accordance with the law of 6 January 1978 (*'Loi Informatique et Libertés'*) amended (hereafter 'LIL') and regulation (EU) General Data Protection Regulations of 27 April 2016 (hereafter 'GDPR');
- The Association has a Data Protection Officer.

### 2. Purpose of this policy

This policy describes how personal data processed via the site "[www.procida-family.com](http://www.procida-family.com)" or "[www.ischia-family.com](http://www.ischia-family.com)" is protected.

This policy describes how the Association and the volunteer members who administer the proposed services process the personal data of the members and visitors (hereafter the 'User(s)') when navigating the Association's website (hereafter the 'Website') and their use of the services offered (hereafter the 'Services').

This policy may be modified, supplemented or updated in order to ensure it continues to comply with any regulatory, legal and technical developments. However, the personal data of Users will always be processed in accordance with the policy in force at the time of collection, unless a mandatory legal requirement is applied retrospectively.

This policy is an integral part of the General Conditions of Use of the Website.

The Role of Data Protection Officer is assigned to President of the Association.

### **3. Identification of those responsible for data processing**

Legal reminder: The Data Controller, as defined by the LIL, is the party which determines the means and purposes of data processing. Nominated parties may process personal data on behalf of the Data Controller and acts under their direction and authority.

The Data Controller is "*La Grande Famille de Procida & Ischia*" (above and hereafter the 'Association'). The Association is represented by Mr *Pascal Scotto di Vettimo*, its President.

The Association takes appropriate measures to ensure the protection and confidentiality of the personal information it holds or handles in accordance with the provisions of the LIL and the GDPR.

### **4. Collection and origin of data**

All User data is collected directly from Users.

The Association undertakes to gain the consent of its Users and/or to allow them to withdraw consent for the use of their data for certain purposes when this becomes necessary.

In all cases, Users are informed of the purposes for which their data is collected through data collection forms, whether online or not.

### **5. Purpose of the data collected**

- **The need for data collection**

All Users submit personal data as part of his/her application for membership of the Association.

If the User does not want to submit the information requested, the User may not be able to access certain parts of the Website or Services, and the Association may be unable to respond to the his/her request.

- **Purpose**

The legal basis for collection of your personal data:

- The Association's legitimate interest in ensuring the continuity of its principal activities, as described in the Association's Articles of Association;
- The Association's legitimate interest in ensuring the quality of its services, and improving the functioning of its Website and its Services;
- To permit the Association to carry out voluntary satisfaction surveys on its services in order to improve them;
- The consent of its Users when it is required by law.

Data from Users of the Association are mainly processed to:

- Allow Users to navigate the Website and use the Services;

- Prevent and combat digital fraud and the theft of genealogical data;
- Improve Website browsing and use of the Services;
- Compile statistics using data provided by Users (e.g. their family origins or country of residence) and/or generated by User activity (for example, the number of document orders);
- If necessary, to compile statistics on the use of the Website and the Services.

The mandatory or optional nature of the personal data requested and the possible consequences of a failure to provide them is made clear to Users at the point of data collection.

## **6. Types of data processed**

The Association is likely to handle all or part of the following data:

- **For member management:**
  - First and last name
  - Date and place of birth
  - Telephone number
  - Email address
  - Postal address
  - Type of membership
  - Places and regions of family origins
  - Username and password
  - Profession
- **To allow browsing the Website or using the Services:**
  - Data connection (username and password)
  - Appearance of the member in the online membership list
  - Other settings on the Website or the Services
- **For communication campaigns:**
  - Telephone number
  - Email address

## **7. Non-transfer of personal data**

Users' personal data will not be transmitted to commercial or advertising bodies.

Users' personal data will not be transferred to third parties or passed to other Users without the consent of the User concerned.

Within the limits of their respective functions and for the purposes referred to above, the principal persons likely to have access to User data are mainly the leaders of the Association, the volunteer members tasked with processing document orders, and members completing specific delegated tasks (such as organizing events).

## 8. Data retention periods

Data collected or generated by the Association are retained without time limit to allow members to maintain their activity history (e.g. user profile, messages posted, orders) at the renewal of their membership.

## 9. The rights of Users

Whenever the Association processes personal data, the Association takes all reasonable steps to ensure the accuracy and relevance of the personal data with regard to the purposes for which the Association is processing the data.

In accordance with the current European regulations, Users of the Association have the following rights:

- Right to access (article 15 GDPR) and correction (article 16 GDPR), updating, and completion of the data;
- Right to lock or erase any personal data (article 17 of the GDPR), when they are inaccurate, incomplete, unclear, outdated, or where the collection, use, transfer or retention of data is prohibited;
- Right to withdraw consent at any time (Article 13-2c GDPR);
- Right to limit the processing of User data (article 18 GDPR);
- Right to oppose the processing of User data (article 21 GDPR);
- Right to the portability of the data that Users have provided, when data is being processed based on their consent or on a contract (article 20 GDPR);
- Right to define what should happen to a User's data following his/her death and to choose whether (or not) the Association transfers the User's data to any previously nominated third party. As soon as the Association becomes aware of the death of a User and in the absence of instruction on his/her part, the Association will destroy the data, unless its preservation is necessary for evidential purposes or to meet a legal obligation.

If a User wants to know how the Association uses his/her personal data, or wishes to rectify or object to data processing, the User can contact the Association by post at the address indicated in paragraph 11 (Contact Us) or by e-mail at *info@procida-family.com*.

In this case, the User must specify the personal data that he/she would like the Association to correct, update or remove, and must provide proof of identify (ID card or passport). Requests to remove personal data will be subject to the obligations that are imposed on the Association by law, in particular those relating to the preservation or archiving of documents.

Finally, Users of the Association may lodge a complaint with the supervisory authorities, and in particular the CNIL (<https://www.cnil.fr/fr/plaintes>).

## 10. Security

The Association uses technical and organizational measures to ensure the security of data processing and the confidentiality of personal data.

The Association ensures appropriate measures are in place to protect data and to minimize any risks in handling data and to prevent data from becoming distorted, damaged, or accessed by unauthorized third parties. (For example, by encrypting access to the Website and management of User permissions).

#### **11. Contact Us – Contact information for the Data Protection Officer**

If a User has any questions or complaints about the Association's compliance with this policy, or if the User wishes to share with the Association recommendations or comments to improve this policy, the User can contact the Data Protection Officer in writing at the following address:

*La Grande Famille de Procida & Ischia  
13 Rue de la Garelière  
41100 Villiers-sur-Loir  
France*

or by email at: *info@procida-family.com*