
City of Bruges, OCMW Bruges & Associations: General Privacy Statement

V 2.0– 20181116

This Privacy Statement is also available in German, French and English. Should the German, French and/or English version of this Privacy Statement deviate from the Dutch version, the Dutch version of the Privacy Statement shall take precedence.

Privacy Statement

Introduction

The City of Bruges, OCMW Bruges, Mintus association (Zorgvereniging Brugge), Ons Huis association, De Blauwe Lelie association, SPOOR Brugge association, 't Sas association, WOK association, De Schakelaar association, SVK association and Riddersstove association (hereinafter the City of Bruges, OCMW Bruges and the Associations) respect your privacy and all your data will be treated confidentially. The processing of personal data takes place in a manner that is in accordance with the requirements of the General Data Protection Regulation (Regulation EU 2016/679, abbreviated as GDPR) and any other legislation and regulations relating to privacy protection (for example, the "Camera Act").

This Privacy Statement explains how the City of Bruges, OCMW Bruges and the Associations such as local authorities and/or organisations of the OCMW handle such data. The City of Bruges, OCMW Bruges and the Associations have an elaborated Information Security policy and measures on information security, as well as a Privacy Protection Policy that has been drafted in accordance with the applicable legislation. The policy in this area is also supported by a specially appointed information security consultant and a Data Protection Officer (DPO).

The Privacy Statement is divided into a general part, a part specifically for the information processing systems (software, databases, etc.), a part relating to the websites and finally a part about the newsletters managed by or commissioned by the respective authorities.

1. General information

About the City of Bruges, OCMW Bruges and the Associations

Using the information systems and methods of the City of Bruges, OCMW Bruges and the Associations, inventories are made, policy measures are implemented and information is provided relevant to the policy, to its own services and to other authorities, inspection services and citizens. All this is done with the general objective of guaranteeing services to citizens as best as possible.

Identification of the personal data controller

The City of Bruges

Burg 12

8000 Bruges

Telephone: +32 50 44 80 00

E-mail: info@brugge.be

Official website of the City of Bruges: www.brugge.be

KBO number of the City of Bruges: 0207.528.035

The OCMW Bruges

Hoogstraat 9
8000 Bruges
Telephone: +32 50 32 70 00
E-mail: info@ocmw-brugge.be
Website: www.ocmw-brugge.be
KBO number: 0207.832.792

Mintus (care association)

Ruddershove 4
8000 Bruges
Telephone: +32 50 32 70 00
E-mail: info@mintus.be
Website: www.mintus.be
KBO number: 0682.844.465

The Associations:

- SVK Bruges (Social Rental Office)
- WOK (Werkt Ook!)
- Spoor Brugge
- 't Sas
- De Schakelaar
- Ons Huis
- De Blauwe Lelie
- Ruddersstove (Central kitchen)

SVK Brugge association (Social Rental Office Bruges):

Ruddershove 4
8000 Bruges
Telephone: +32 50 32 74 10
E-mail: info@svk-brugge.be
Website: www.svk-brugge.be
KBO number: 0860 256 673

WOK association (Werkt Ook!):

Ruddershove 4
8000 Bruges
Telephone: +32 50 32 76 82
E-mail: info@wokbrugge.be
Website: www.wokbrugge.be
KBO number: 0267.404.056

Spoor association:

Ruddershove 4
8000 Bruges
Telephone: +32 50 32 60 87
E-mail: info@spoorbrugge.be
Website: www.svk-brugge.be
KBO number: 0807.042.275

't Sas association:

Prof. Dr. J. Sebrechtstraat 2
8000 Bruges
Telephone: +32 50 32 76 70
E-mail: info@sasbrugge.be
Website: www.sasbrugge.be
KBO number: 0871.928.743

De Schakelaar association:

Hoogstraat 9
8000 Bruges
Telephone: +32 50 32 64 43
E-mail: energiesnoeiers@deschakelaar.be
Website: www.deschakelaar.be
KBO number: 0831.970.978

Ons Huis association:

Sint-Annarei 6
8000 Bruges
Telephone: +32 50 32 71 90
E-mail: info@onshuisbrugge.be
Website: www.svk-brugge.be
KBO number: 0878.405.769

De Blauwe Lelie association:

Ruddershove 4
8000 Bruges
Telephone: +32 50 32 72 60
E-mail: info@deblauwelelie.be
Website: www.deblauwelelie.be
KBO number: 0863.329.296

Ruddersstove association:

Ruddershove 4
8000 Bruges
Telephone: +32 50 32 72 40
E-mail: maaltijden@ruddersstove.be
Website: www.ruddersstove.be
KBO number: 0894.999.895

2. The information processing systems

This part of the Privacy Statement describes the data processing in a structured way, mainly by computer systems and IT solutions (software, databases) by the City of Bruges, OCMW Bruges and the Associations.

2.1 Processing of personal data

The City of Bruges, OCMW Bruges and the Associations process your personal data as a citizen or as an employee of a government/authority, organisation or company. In this capacity, your data is processed as those of a "data subject" and/or you acquire access to one or more information processing systems.

In Article 4 of the *General Data Protection Regulation*, the following definition of the term 'processing' is stipulated: "any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction."

The City of Bruges, OCMW Bruges and the Associations require certain information from you:

- to fulfil their legal obligations and assigned tasks as a government institution;
- to be able to perform certain administrative activities (financial administration and invoicing, rights management, management of the user agreement and the like);
- to, if so desired, keep you up to date on new developments concerning one or more themes for which the City of Bruges, OCMW Bruges and the Associations bear responsibility.

In this context, the City of Bruges, OCMW Bruges and the Associations will potentially process - depending on the nature of the relationship with you as a citizen or employee of a government/authority, organisation or company and the necessary processing of (personal) data - the following data:

- Title/form of address
- First name
- Middle name
- Surname
- National register number
- Sex
- Date of birth
- Age or birth year
- Nationality
- Address(es)
- E-mail address(es)
- Telephone/mobile/fax
- Family status
- Medical data (e.g. in the context of healthcare: certain conditions or allergies)
- Data relating to lifestyle habits (e.g.: diet)
- Financial data (e.g. bank account)

During use of the information processing systems by employees or yourself (e.g. when assessing or consulting an application made available via web access), certain data is collected by the City of Bruges, OCMW Bruges & Associations and/or the processors designated by them. This data is required for the services and monitoring of the quality of the collected data of the City of Bruges, OCMW Bruges and the Associations. These data may be used by the City of Bruges, OCMW Bruges and the Associations or a

processor/service provider appointed by them under strict conditions if, for example, there are complaints about the connection or the malfunctioning of a software/web application. Depending on the activity you perform as a data subject, the City of Bruges, OCMW Bruges and the Associations may collect the following data in this context:

- IP address
- username (login) or identification number
- eID identification and authentication data
- time of operations in the software.

2.2 The role of your local authority in the processing of (personal) data

The City of Bruges, OCMW Bruges and the Associations process data from their target groups and contacts (citizens, employees of other governments/organisations/companies, clients, consultancies, experts, etc.) and are responsible for these data processing operations **as Controller** within the meaning of the *General Data Protection Regulation*.

In a number of cases, processors appointed for this purpose, with whom a relevant contract and/or processing agreement has been concluded within the framework of the *General Data Protection Regulation* and other legal and regulatory obligations, will in turn process personal data of data subjects with the information systems or data processed by these information systems.

The City of Bruges, OCMW Bruges and the Associations themselves can also act as co-controller or as the **Processor** of personal data within the meaning of the *General Data Protection Regulation*. This means that the City of Bruges, OCMW Bruges and the Associations process personal data on instructions and on assignment from other authorities or bodies authorised to do so. In this case, these other authorities or bodies act as **Controller** for these data processing operations, within the meaning of the *General Data Protection Regulation*. To do this, they apply their own privacy policy that the City of Bruges, OCMW Bruges and the Associations are not responsible for.

In each of these cases, a *register of data processing* is drawn up in accordance with the **General Data Protection Regulation** and is updated when any changes are enacted. The register (inventory) for the processing of personal data can be viewed by the competent Data Protection Authority (DPA); in Belgium, from 25 May 2018, this is the "Data Security Authority", as successor of the Commission for the protection of the private sphere (better known as the Privacy Commission). Every organisation that processes personal data and is subject to the *General Data Protection Regulation* is obliged to provide access to the Data Protection Authority if it so requests.

The City of Bruges, OCMW Bruges and the Associations make the necessary efforts to map out and update the processing activities when necessary, for example, in the case of new or altered methods of personal data processing or when using other streams of information.

The City of Bruges, OCMW Bruges and the Associations provide their employees with training and instructions on how to deal with personal data and particularly how to deal with confidential and sensitive personal data. In addition, professional secrecy and official secrecy of course also play a distinct role.

2.3 Authorisations of the competent authorities for the processing of certain data

For the processing of personal data in which the City of Bruges, OCMW Bruges and the Associations or the government bodies for which they act as successors have obtained an authorisation, you will find the list here, along with an explanation and reference to the authorisation decision in question.

The authorisations can be found at www.visitbruges.be/privacy-3

3. Exercising your right of access, improvement or deletion

The General Data Protection Regulation provides for a number of privacy rights, which can always claim as a data subject. Of course, this must always take the privacy rights of other persons into account and be in line with the legal provisions and restrictions.

As a data subject in the sense defined in the General Data Protection Regulation, you have the following rights that can be summarised in "the right to a correct, legitimate processing of your personal data":

- Right of access (Art. 15 of the GDPR)
- Right to rectification, or right to correct errors (Art. 16 of the GDPR)
- Right to erasure of data ("right to forget"); this right is applicable in certain cases and, in particular, if we process data from you on the basis of an informed consent, for which we can not invoke any legal or other legitimate need for further processing (Art. 17 of the GDPR);
- Right to restrict processing (Art. 18 of the GDPR);
- Notification of rectification, erasure or restriction of processing (Art. 19 of the GDPR);
- Right to the transferability of personal data (Art. 20 of the GDPR);
- Right of objection/opposition to the processing of your data (Art. 21 of the GDPR);
- Rights with regard to individual decision-making, including profiling (Art. 22 of the GDPR).

Always contact the authority (City, OCMW) or the Association in question or - if necessary or desired - the Data Protection Officer (DPO). After all, if you have a question or complaint about your privacy rights, we would like to provide the necessary information ourselves, take measures or explain why we may not be able to respond to a question you have posed.

In addition, you have the right to file a complaint with the Belgian Data Protection Authority (DPA), if you believe that your rights have been violated and your rights have not been sufficiently recognised by the City of Bruges, OCMW Bruges or an Association.

For the processing of personal data in which the City of Bruges, OCMW Bruges & the Associations act as the Controller for the data processing within the meaning of the *General Data Protection Regulation*, "data subjects" (i.e. every citizen) can submit a request for access, correction or deletion, and the City of Bruges, OCMW Bruges & the Associations will treat these in accordance with the provisions prescribed by the *General Data Protection Regulation*.

For the processing of personal data in which the City of Bruges, OCMW Bruges or one of the Associations does not act as the Controller for the data processing within the meaning of the *General Data Protection Regulation*, requests for access, correction or erasure can not be handled independently by the City of Bruges, the OCMW Bruges or the Care Association Mintus (Zorgvereniging). In that case, requests for access, correction or erasure must be submitted to the Controller for the data processing using the services and processing with/through the information systems of the City of Bruges, OCMW Bruges or the Care Association Mintus Bruges (Zorgvereniging Brugge).

For more information regarding the way in which personal data are processed within the jurisdiction of the City of Bruges, OCMW Bruges & the Associations or the exercising of a right under the *General Data*

Protection Regulation, you should contact the Data Protection Officer (DPO) of the City of Bruges, OCMW Bruges & the Associations:

Data Protection Officer (DPO)

Address: Ruddershove 4, 8000 Bruges

Telephone: +32 50 32 73 50

E-mail: dpo@mintus.be

4. Websites and social media of the City of Bruges, OCMW Bruges and the Associations

This section describes the data processing within the websites and related communication channels (social media) of the City of Bruges, OCMW Bruges and the Associations:

- www.brugge.be
- vrijetijd.brugge.be
- visitbruges.be
- meetinginbrugge.be
- jeugddienstbrugge.be
- ccbrugge.be
- conservatorium-brugge.be
- snt.be
- academiebrugge.be
- <https://www.facebook.com/destadbrugge>
- <https://twitter.com/stadbrugge>
- <https://www.youtube.com/user/destadbrugge>
- <https://www.linkedin.com/company/stad-brugge>
- <https://www.instagram.com/stadbrugge/>
- ocmw-brugge.be
- mintus.be
- dienstencentra-brugge.be
- svk-brugge.be
- wokbrugge.be
- spoorbrugge.be
- hetscharnier.be
- opvoedingswinkel.be
- huisvanhetkindbrugge.be
- huisvanhetkinddoz.be
- sasbrugge.be
- deschakelaar.be
- onshuisbrugge.be
- deblauwelelie.be
- maaltijdzorgplatform.be
- ruddersstove.be

Cookies

A cookie is a small text file that the browser places on your computer, smartphone or tablet. The website, web application and app software all use **technical** and **functional** cookies.

The websites of the City of Bruges, OCMW Bruges and the Associations use cookies to remember your settings and preferences, thereby increasing your user experience. Some of these cookies are only used temporarily during a 'session' in which you consult the website. Other cookies may be stored on your device, so that when you next use that device and that browser, a number of user settings can be set up faster and you have a smoother user experience.

The City of Bruges, OCMW Bruges and the Associations always ask you for your express permission whenever you visit (OPT-IN) a website of the City of Bruges, OCMW Bruges or the Associations. You can configure your web browser so that it does not store cookies on your computer. You always have the option to delete previously stored cookies.

You will find more information for the most used browsers about refusing cookies and how to delete cookies on the website <http://www.aboutcookies.org/> (EN).

Google Analytics [and Google Adwords]

On the websites of the City of Bruges, OCMW Bruges or the Care Association (Zorgvereniging) itself or those under their management, Google Analytics can be used to measure how often and in which way the website is visited. To perform these measurements, Google will store certain information, such as your IP address on its servers in the United States. The Privacy Statement of Google can be consulted (among other things) at <http://www.google.com/intl/en/policies/privacy/>. The City of Bruges, OCMW Bruges and the Associations have not allowed Google to use the obtained information for other purposes than for the services provided to the City of Bruges, OCMW Bruges and the Associations. The necessary privacy settings are used for this purpose, so that personal data is not passed on to Google or other third parties.

Facebook, Twitter and other social media

The content of certain pages within the websites of the City of Bruges, OCMW Bruges and the Associations can be shared via Twitter, Facebook and/or other social media platforms. When sharing, Facebook, Twitter and other applications store cookies on your computer. Facebook and Twitter may also process personal data from you in this case. To find out what these parties can do with this information, you should consult the respective Privacy Statements. The City of Bruges, OCMW Bruges and the Associations have no influence on this and bear no responsibility for misuse of this data. Care is taken to ensure that, when referring to such social media, a number of safety measures are taken with regard to tracking and piggybacking of personal data.

5. The newsletters from or under the supervision of the City of Bruges, OCMW Bruges & Associations

The City of Bruges, OCMW Bruges and the Associations send out various newsletters by e-mail or post to target groups, usually at their own request. In doing so, from now on, new registrations will be made using active and informed consent (OPT-IN) for use of the contact information you supply. Regarding data that you have already provided to us previously, these will be further processed and used for a time-limited period. Also, for new information provided, a time-limited validity of your consent applies.

The services of the City of Bruges, OCMW Bruges and the Associations will only add your contact details for the management of newsletters and such information tools to the newsletter file if you have explicitly given permission for this, or if you are part of specific target groups of a policy domain. (e.g. employees of

specialised organisations or companies). Each newsletter contains a link with which you can unsubscribe. The databases or lists with e-mail addresses used for the newsletter will in no case be provided to third parties.

6. Application of this Privacy Statement

This Privacy Statement applies from 25 May 2018. The list of websites was updated on 6 November 2018.

If the objectives for which processing takes place change, the City of Bruges, OCMW Bruges and the Associations will take the necessary steps to report this and communicate this in a transparent manner on the website of the City of Bruges, OCMW Bruges and/or the Associations (www.brugge.be).

The City of Bruges, OCMW Bruges and the Associations reserve the right to adapt the Privacy Statement to new needs or insights. Amendments to the Privacy Statement will be made transparent on the website of the City of Bruges, OCMW Bruges and the Associations as well as on the paper version that is available on request from the Communication Department of the City of Bruges, OCMW Bruges and the Associations. For questions about the Privacy Statement or the modifications to it, please contact the Data Protection Officer (DPO).

ANNEX: General Data Protection Regulation – Article 4 Definitions

(Source: 4.5.2016 L 119/33 Official Journal = Official Journal of the European Union EN)

<http://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:32016R0679>

Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data and repealing Directive 95/46/EC (General Data Protection Regulation) (Text with EEA relevance)

Article 4 Definitions

For the purposes of this Regulation:

- 1) **‘personal data’**: any information relating to an identified or identifiable natural person (‘data subject’); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person;
- 2) **‘processing’**: any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction;
- 3) **‘restriction of processing’**: the marking of stored personal data with the aim of limiting their processing in the future;
- 4) **‘profiling’**: any form of automated processing of personal data consisting of the use of personal data to evaluate certain personal aspects relating to a natural person, in particular to analyse or predict aspects concerning that natural person's performance at work, economic situation, health, personal preferences, interests, reliability, behaviour, location or movements;
- 5) **‘pseudonymisation’**: the processing of personal data in such a manner that the personal data can no longer be attributed to a specific data subject without the use of additional information, provided that such additional information is kept separately and is subject to technical and organisational measures to ensure that the personal data are not attributed to an identified or identifiable natural person;
- 6) **‘filing system’**: any structured set of personal data which are accessible according to specific criteria, whether centralised, decentralised or dispersed on a functional or geographical basis;
- 7) **‘controller’**: the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data; where the purposes and means of such processing are determined by Union or Member State law, the controller or the specific criteria for its nomination may be provided for by Union or Member State law;
- 8) **‘processor’**: a natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller;
- 9) **‘recipient’**: a natural or legal person, public authority, agency or another body, to which the personal data are disclosed, whether a third party or not. However, public authorities which may receive personal data in the framework of a particular inquiry in accordance with Union or Member State law shall not be regarded as recipients; the processing of those data by those public authorities shall be in compliance with the applicable data protection rules according to the purposes of the processing;

- 10) **'third party'**: a natural or legal person, public authority, agency or body other than the data subject, controller, processor and persons who, under the direct authority of the controller or processor, are authorised to process personal data;
- 11) **'consent'** of the data subject: any freely given, specific, informed and unambiguous indication of the data subject's wishes by which he or she, by a statement or by a clear affirmative action, signifies agreement to the processing of personal data relating to him or her;
- 12) **'personal data breach'**: a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data transmitted, stored or otherwise processed;
- 13) **'genetic data'**: personal data relating to the inherited or acquired genetic characteristics of a natural person which give unique information about the physiology or the health of that natural person and which result, in particular, from an analysis of a biological sample from the natural person in question;
- 14) **'biometric data'**: personal data resulting from specific technical processing relating to the physical, physiological or behavioural characteristics of a natural person, which allow or confirm the unique identification of that natural person, such as facial images or dactyloscopic data;
- 15) **'data concerning health'**: personal data related to the physical or mental health of a natural person, including the provision of health care services, which reveal information about his or her health status;
- 16) **'principal place of business'**: (a) in relation to a controller who has establishments in more than one Member State, the place where its central administration is located in the Union, unless decisions on the purposes and means of processing personal data are taken at another establishment of the controller who is also located in the Union and who is also empowered to execute those decisions, in which case the establishment where those decisions are taken shall be regarded as the principal place of business; (b) with regard to a processor having establishments in more than one Member State, the place where its central administration is located in the Union or, where the processor does not have a central administration in the Union, the establishment of the processor in the Union where the main processing operations take place in the context of the activities of an establishment of the processor, to the extent that the processor has specific obligations under this Regulation;
- 17) **'representative'**: a natural or legal person established in the Union who, designated by the controller or processor in writing pursuant to Article 27, represents the controller or processor with regard to their respective obligations under this Regulation;
- 18) **'enterprise'**: a natural or legal person engaged in an economic activity, irrespective of its legal form, including partnerships or associations regularly engaged in an economic activity;
- 19) **'group of undertakings'**: a controlling undertaking and its controlled undertakings;
- 20) **'corporate rules'**: personal data protection policies which are adhered to by a controller or processor established on the territory of a Member State for transfers or a set of transfers of personal data to a controller or processor in one or more third countries within a group of undertakings, or group of enterprises engaged in a joint economic activity;
- 21) **'supervisory authority'**: means an independent public authority which is established by a Member State pursuant to Article 51;
- 22) **'relevant supervisory authority'**: a supervisory authority involved in the processing of personal data because: (a) the controller or processor is established in the territory of the Member State of that supervisory authority; (b) data subjects who reside in the Member State of that supervisory authority are, or are likely to be, affected by the processing; or (c) a complaint has been lodged with that supervisory authority;
- 23) **'cross-border processing'**: a) processing of personal data in the context of activities of establishments in more than one Member State of a controller or processor in the Union located in more than one Member

State; or (b) processing of personal data in the context of the activities of a single establishment of a controller or a processor in the Union, thereby causing or likely to affect the data subjects in more than one Member State;

24) '**relevant and reasoned objection**': an objection to a draft decision as to whether there is an infringement of this Regulation, or whether envisaged action in relation to the controller or processor complies with this Regulation, which clearly demonstrates the significance of the risks posed by the draft decision as regards the fundamental rights and freedoms of data subjects and, where applicable, the free flow of personal data within the Union;

25) '**information society service**': a service as defined in point (b) of Article 1(1) of Directive (EU) 2015/1535 of the European Parliament and of the Council (1);

26) '**international organisation**': an organisation and its subordinate bodies governed by public international law, or any other body which is set up by, or on the basis of, an agreement between two or more countries.

(1) http://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:32016R0679#ntr19-L_2016119EN.01000101-E0019

Directive (EU) 2015/1535 of the European Parliament and of the Council of 9 September 2015 laying down a procedure for the provision of information in the field of technical regulations and of rules on Information Society services (OJ L 241, 17.9.2015, p. 1).