

COOKIES & PRIVACY POLICY

This Cookies & Privacy Policy explains how we use the personal information that the SAIL (Services to Associations and Industry in the Lubricant sector) collects or generates both in relation to this website and our services.

The list below sets out what is covered in this Cookies & Privacy Policy and you can click on the headings below to go to a specific section.

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1. BACKGROUND

2. SAIL with its registered office at 1160 Auderghem (Belgium), Boulevard du Souverain 165, collects and uses certain Personal Data. SAIL is responsible for ensuring that it uses that Personal Data in compliance with data protection laws.
3. At SAIL, we respect the privacy of our members and visitors and we are committed to keeping all your Personal Data secure. This Cookies & Privacy Policy governs the handling of Personal Data by SAIL in the course of carrying out our activities.
4. We use the following definitions in this Cookies & Privacy Policy:

"SAIL", "we" or "us" means Services to Associations and Industry in the Lubricant sector

"Cookie" means a small file that includes a small quantity of information sent to the browser of a website user, by a web server, and stored on the hard disk drive of a computer for archiving purposes.

"Personal Data" means any data which relates to a living individual who can be identified from that data or from that data and other information which is in the possession of, or is likely to come into the possession of, SAIL (or its representatives or service providers). In addition to factual information, it includes any expression of opinion about an individual and any indication of the intentions of SAIL or any other person in respect of an individual.

5. THE TYPES OF PERSONAL DATA WE COLLECT

6. Many of the services offered by SAIL require us to obtain Personal Data about you in order to perform our services. We will collect and process the following Personal Data about you:

- **Information that you provide to SAIL.**

This includes information about you that you provide to us. The nature of the services you are requesting will determine the kind of Personal Data we might ask for, though such information may include (by way of a non-exhaustive list):

- basic Personal Data (such as first name; family name; position in the company; company name; company email address; business phone number; business address; city; postcode; country);
- any information that you choose to share with us either through SAIL's website or otherwise and which can be considered as Personal Data;

- **Information that we collect or generate about you.**

This includes, among other information, the Personal Data provided to or exchanged with us in the context of interactions about SAIL Services or other interactions with us;

- **Cookies**

When you visit this website, Cookies are used to collect technical information about the services that you use, and how you use them. For further information about Cookies used by SAIL, please refer to paragraph 9 below;

- **Anonymized data**

In addition to the categories of Personal Data described above, SAIL will also process further anonymized information and data that is not processed by reference to a specific individual.

7. HOW WE USE YOUR INFORMATION

1.1 Your Personal Data may be stored and processed by us in the following ways and for the following purposes:

- for ongoing review and improvement of the information provided on this website to ensure they are user friendly and to prevent any potential disruptions or cyber-attacks;
- to allow you to use and access the functionality provided by this website;
- to assess your application for SAIL's services (including membership), where applicable;
- to provide you with SAIL's services;
- to set up SAIL's customers or members;

- to invite you to events organized by SAIL, its partners and members;
- to manage your attendance to the above events;
- to understand feedback on SAIL and SAIL's services and to help provide more information on the use of those services quickly and easily;
- to communicate with you in order to provide you with services or information about SAIL;
- to understand your needs and interests;
- for the management and administration of our business;
- in order to comply with and in order to assess compliance with applicable laws, rules and regulations, and internal policies and procedures; and / or
- for the administration and maintenance of databases storing Personal Data.

1.2 When we use Personal Data, we make sure that the usage complies with law (including but not limited to GDPR) and the law allows us and requires us to use Personal Data for a variety of reasons. These include where:

- we need to do so in order to perform our contractual obligations with our customers or members;
- we have obtained your consent;
- we have legal and regulatory obligations that we have to discharge;
- we may need to do so in order to establish, exercise or defend our legal rights or for the purpose of legal proceedings;
- the use of your Personal Data as described above is necessary for our legitimate interests, such as:
 - allowing us to manage and administer the operation of our activities effectively and efficiently;
 - maintaining compliance with internal policies and procedures;
 - overseeing compliance with the ATIEL Code of Practice and Compliance Policy;
 - promoting our activities and those of our members.

1.3 We will take steps to ensure that the Personal Data is accessed only by SAIL's officials that have a need to do so for the purposes described in this Cookies & Privacy Policy.

2. DISCLOSURE OF YOUR INFORMATION TO THIRD PARTIES

2.1 We may share your Personal Data with SAIL members for the purposes described above.

2.2 We may also share your Personal Data outside of the aforementioned group of associations and / or members for the following purposes:

- With our business partners;

For example, this could include intermediaries who introduced you to SAIL. Personal Data will only be transferred to a business partner who is contractually obliged to comply with appropriate data protection obligations and the relevant privacy and confidentiality legislation;

- With third party agents and contractors for the purposes of providing services to us;

For example, this could include SAIL's accountants, professional advisors, IT and communications providers and debt collectors. These third parties will be subject to appropriate data protection obligations and they will only use your Personal Data as described in this Cookies & Privacy Policy;

- To the extent required by law;

For example, this could include situations where we are under a duty to disclose your Personal Data in order to comply with any legal obligation (including, without limitation, in order to comply with tax reporting requirements and disclosures to regulators), or to establish, exercise or defend our legal rights;

3. INTERNATIONAL TRANSFERS OF PERSONAL DATA

1.1 SAIL carries out its activities at a global level. Our members and our operations are spread around the world. As a result, we collect and transfer Personal Data on a global basis. That means that we may transfer your Personal Data to locations outside of your jurisdiction.

1.2 Where we transfer your Personal Data to another country outside the EEA, we will ensure that it is protected and transferred in a manner consistent with legal requirements. In relation to data being transferred outside of Europe, for example, this may be done in one of the following ways:

- the country that we send the data to might be approved by the European Commission as offering an adequate level of protection for Personal Data (see the list of approved jurisdictions on the [European Commission website](#));
- the recipient might have signed up to a contract based on "model contractual clauses" approved by the European Commission, obliging them to protect your Personal Data;
- where the recipient is located in the US, it might be a certified member of the EU-US Privacy Shield scheme; or
- in other circumstances the law may permit us to otherwise transfer your Personal Data outside Europe.

1.3 You can obtain more details of the protection given to your Personal Data when it is transferred outside Europe (including a copy of the standard data protection clauses which we have entered into with recipients of your Personal Data) by contacting us as described in paragraph 10 below.

4. HOW WE SAFEGUARD YOUR INFORMATION

- 1.4 We have controls in place to maintain the security of our information and information systems. The files and documentation which we have in our databases are protected with safeguards aligned with the sensitivity of the relevant information. Appropriate controls (such as restricted access) are placed on our computer systems. Physical access to areas where Personal Data is gathered, processed or stored is limited to authorised officials.
- 1.5 As a condition of contract, SAIL's officials are required to follow all applicable laws and regulations, including in relation to data protection law. Access to sensitive Personal Data is limited to those officials who need to it to perform their roles. Unauthorised use or disclosure of confidential client information by a SAIL official is prohibited and may result in disciplinary measures.
- 1.6 When you contact a SAIL official or representative about files and documentation which concern you, you may be asked for some proof of your identity. This type of safeguard is designed to ensure that only you, or someone authorised by you, has access to your file.

5. HOW LONG WE KEEP YOUR PERSONAL DATA

- 1.7 How long we will hold your Personal Data for will vary and will be determined by the following criteria:
 - the purpose for which we are using it – SAIL will need to keep the data for as long as is necessary for that purpose; and
 - our legal obligations – laws or regulation may set a minimum period for which we have to keep your Personal Data.

6. YOUR RIGHTS

- 1.8 In all the above cases in which we collect, use or store your Personal Data, you may have the following rights and, in most cases, you can exercise them free of charge. These rights include:
 - the right to obtain information regarding the processing of your Personal Data and access to the Personal Data which SAIL holds about you;
 - the right to withdraw your consent to the processing of your Personal Data at any time. Please note, however, that SAIL may still be entitled to process your Personal Data if we have another legitimate reason for doing so. For example, we may need to retain Personal Data to comply with a legal obligation;
 - in some circumstances, the right to receive some Personal Data in a structured, commonly used and machine-readable format and/or request that we transmit those data to a third party where this is technically feasible. Please note that this right only applies to Personal Data which you have provided directly to SAIL;

- the right to request that we rectify your Personal Data if it is inaccurate or incomplete;
- the right to request that we erase your Personal Data in certain circumstances. Please note that there may be circumstances where you ask us to erase your Personal Data but we are legally entitled to retain it;
- the right to object to, or request that we restrict, our processing of your Personal Data in certain circumstances. Again, there may be circumstances where you object to, or ask us to restrict, our processing of your Personal Data but we are legally entitled to refuse that request; and
- the right to lodge a complaint with the relevant data protection regulator if you think that any of your rights have been infringed by us.

1.9 You can exercise your rights by contacting us using the details listed in paragraph 10 below.

7. COOKIES

1.10 This paragraph 9 concerning Cookies applies to each use of this website. You gave your consent to the use of Cookies in the cookie banner of this website, as described in each relevant cookie banner and in this paragraph 9.

1.11 To the extent that we collect Personal Data with the help of Cookies, we will process them in accordance with this Cookies & Privacy Policy. In addition to Personal Data, this website also records non-Personal Data (number and duration of the visits, preferences, etc.). Those data are used to improve this website and their use, for example by displaying information based on the interests of the user. SAIL will periodically receive a summary of the data rendered anonymous that cannot lead to identifiable users. Those data do no longer allow identifying the individual user.

1.12 SAIL is doing its best efforts to keep the information on the Cookies up-to-date; however, SAIL insists on the fact that the information is always a snapshot. Because of the innovative nature of this website, the non-static character of the internet and the third parties involved in the use of Cookies, it is possible that all Cookies and information are not available here.

The cookies are part of the functionalities of our website. If your browser does not accept the cookies, you will not be able to use this website properly.

8. QUESTIONS AND CONCERNS

1.13 If you have any questions or concerns about SAIL's processing of your Personal Data, or about this Cookies and Privacy Policy, please contact our Privacy Officer using the following contact information:

Address: JEF SOETEWY, SAIL, 3rd Floor, Boulevard du Souverain 165, B-1160 Auderghem/Oudergem, Belgium

Email Address: administrator@sail-europe.eu

We are usually able to resolve privacy questions or concerns promptly and effectively. If you are not satisfied with the response you receive from our Privacy Officer, you may escalate concerns to the applicable privacy regulator in your jurisdiction. For Belgium, the contact information for the Data Protection Authority are as follows:

Autorité de protection des données / Gegevensbeschermingsautoriteit
Rue de la Presse, 35, 1000 Bruxelles
Tel.: +32 (0)2 274 48 00
Fax: +32 (0)2 274 48 35
Email: contact@apd-gba.be
Website: www.autoriteprotectiondonnees.be/contact

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