



# **PERSONAL DATA PROTECTION POLICY CHARTER**

## 1. DATA CONTROLLER

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Humundi is a "Data Controller" within the meaning of Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 and the Law of 30 July 2018 on the protection of individuals with regard to the processing of personal data (hereinafter "the RGPD").

## 2. SCOPE OF APPLICATION

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Any natural person - as donor, beneficiary, employee, partner, consultant, trainee, volunteer, employee of a legal entity in relation with the data controller or in any other capacity - whose personal data are processed by Humundi is concerned by the present charter.

## 3. GENERAL PRINCIPLES

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Humundi guarantees that any processing of personal data it carries out is compliant with the GDPR. Consequently, Humundi :

- implements appropriate technical and organisational measures to ensure that processing is carried out in accordance with the principles of the RGPD ;
- ensures that it complies with the legal provisions relating to the protection of personal data. To this end, it ensures that its tools, products, applications and services effectively incorporate data protection principles from the outset (principle of data protection by design);
- guarantees that it will only collect, process or use data that is necessary for the specific purposes for which it is being processed. This applies to the amount of personal data collected, the extent of its processing, its retention period and its accessibility (principle of data protection by default).

## 4. PURPOSES OF PROCESSING

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The purpose of the personal data collected and used by Humundi is to enable it to fulfil the missions assigned to it by its statutes, namely: "combating food insecurity, poverty and inequality, promoting equitable and sustainable food systems and ensuring healthy food for all" and to improve the services it offers.

The various personal data processing operations carried out by Humundi are based on :

- legal and regulatory obligations (justification of subsidies, obligations in terms of employment law, transmission of donation certificates, etc.);
- contractual obligations, such as the administration of registrations for activities, the management of human resources (volunteers, trainees, etc.), the proper performance of partnerships and contracts with subcontractors, service providers, suppliers, customers and stakeholders,

- legitimate interest in promoting and communicating its activities;
- consent for the purpose of capturing/broadcasting the image or voice of the persons concerned.

## 5. PERSONAL DATA COLLECTED

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Most processing operations require the collection and processing of personal data relating to the identity and contact details of the persons concerned (surname, first name, e-mail address, telephone number, postal address, etc.).

In addition, other additional personal data relating to data subjects may be collected depending on the nature of the processing carried out, such as :

- for processing related to personnel management and remuneration: job title, level of education, salary, bonuses, disciplinary sanctions, evaluation within the company, national number, etc.
- for processing involving financial flows: VAT number, bank details,
- for treatments related to Humundi's operational activities: professional institutions, functions, interests, languages spoken, information on food allergies, etc...
- For information on the use of cookies on the website, see our cookies policy published on our website:  
<https://www.humundi.org/en/cookies-policy/>

## 6. THE RIGHTS OF THE PERSONS CONCERNED

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Under the GDPR, data subjects whose personal data are processed by Humundi are granted the following rights.

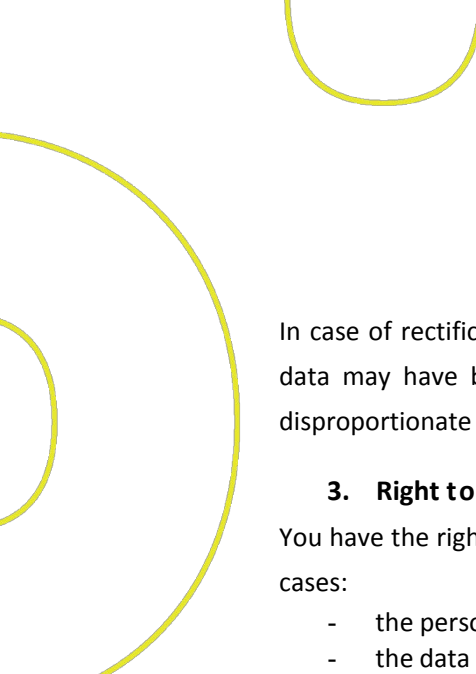
### 1. Right of access and information

You have the right of access to your data, i.e. the right to access, without having to justify your request, your personal data processed by Humundi. You can also ask for a copy of the processed data.

Humundi may require the payment of reasonable fees based on the administrative costs related to the request. Humundi may also refuse any request that is manifestly abusive.

### 2. Right of rectification

You have the right to obtain from Humundi, as soon as possible, the rectification of personal data concerning you which are inaccurate, incomplete or obsolete.



In case of rectification, Humundi will notify each sub-processor or partner to whom your personal data may have been communicated, unless such communication proves impossible or requires disproportionate efforts.

### **3. Right to erasure ("right to be forgotten")**

You have the right to ask Humundi to delete your personal data as soon as possible in the following cases:

- the personal data are no longer necessary for the purposes for which they were collected;
- the data processing was based exclusively on your consent, which you have withdrawn;
- you object, on justified grounds, to the processing.

In any event, this right may not be granted if the processing is necessary for compliance with a legal obligation which requires such processing or if it is necessary for the establishment, exercise or defence of legal claims.

In case your personal data are deleted, Humundi will notify each sub-processor or partner to whom the personal data may have been communicated, unless such communication proves impossible or requires disproportionate efforts.

### **4. Right to limitation**

You have the right to obtain from Humundi the restriction of the processing of your personal data when one of the following situations applies :

- You contest the accuracy of the personal data. In this case, the limitation only applies for a period of time allowing Humundi to verify the accuracy of the personal data;
- The processing is unlawful, and instead of erasure, you demand that their use be restricted;
- Humundi no longer processes your data for the purposes for which it was collected, but it is still necessary for the establishment, exercise or defence of legal claims.
- You can prove that you objected to the processing.

In case of a restriction of the processing of your personal data, Humundi is obliged to notify it to any subcontractor or partner to whom the personal data may have been communicated, unless such communication proves to be impossible or requires disproportionate efforts.

### **5. Right to data portability**

You have the right to request that the data you have provided to Humundi be transmitted to you in a structured, commonly used and machine-readable format. Furthermore, you have the right to transmit your data to another data controller without Humundi being able to prevent it.

You may also request that your data be transmitted directly by Humundi to another data controller where technically possible.

### **6. Right to object**

You have the right to object at any time, for reasons relating to your particular situation, to the processing of your personal data.

In this case, Humundi must immediately stop processing the data in question, unless :

- Humundi does not demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms;
- Humundi demonstrates that there are grounds for the establishment, exercise or defence of legal claims.

## **7. THE DATA PROTECTION OFFICER**

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If you wish to assert any of the rights set out above or obtain any information relating to your personal data, you can contact the Data Protection Officer designated at the following e-mail address: [dpo@humundi.org](mailto:dpo@humundi.org)

As this data is of a personal nature and therefore confidential, your request must be accompanied by a copy of your identity card as proof of identity.

Humundi undertakes to answer all requests within a reasonable time, and in any case, within a maximum of 30 calendar days from the receipt of your request. However, depending on the complexity of the request, and in accordance with the RGPD, the response time may be extended to three months.

## **8. CLAIM**

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In the event of disagreement or lack of response, you may lodge a complaint with the Data Protection Authority (DPA), whose full contact details are available at: [www.autoriteprotectiondonnees.be/](http://www.autoriteprotectiondonnees.be/)

## 9. UPDATE

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This data protection policy charter may be subject to changes and additions as a result of legislative or other developments (in particular relating to the technological means used for data processing).

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