

Privacy Statement for the ECB Sports & Cultural Club

What is our legal framework?

In accordance with Article 1.1 of the Statute of the ECB Sports and Cultural Club, the ECB Sports and Cultural Club (hereinafter 'the Club') is a non-registered association under German law. The Club is not a function of the European Central Bank (ECB) and its activities are not related to the performance of tasks carried out in the public interest or in the exercise of official authority vested in an Union institution or body in accordance with Article 2(1) and Article 5(1)(a) of [Regulation \(EU\) 2018/1725](#)¹ ('EUDPR').

It is important to highlight that the Club does not store or process any ECB business data. The Club processes personal data from its members, including ECB staff members, their children, spouses, ECB pensioners, as well as other staff serving the institutions and agencies of the European Union. All personal data is processed in accordance with the applicable Union and German law, notably the provisions laid down in [Regulation \(EU\) 2016/679](#)² ('GDPR').

Our privacy statement explains how the Club collects, uses and protects personal data.

Why do we process personal data?

The Club and its Sections and Communities³ collect the necessary personal data to comply with the terms of their membership and only use such personal data for this purpose. The Club needs to be able to verify the identity of its members for membership management, the organisation of events open to its members and effective communication with its members.

The Club may collect personal data in a few limited ways as follows.

- Directly from you when you fill in an application for membership, when you provide information via the Club's web pages or the online calendar functionality of the Club, its Sections and Communities, or when you interact with the Club and its Sections and Communities during your time as a member.

From someone else who has applied for membership on your behalf (i.e. a family member) who has provided the Club with your personal contact details for that purpose).

¹ Regulation (EU) 2018/1725 of the European Parliament and of the Council of 23 October 2018 on the protection of natural persons with regard to the processing of personal data by the Union institutions, bodies, offices and agencies and on the free movement of such data, and repealing Regulation (EC) No 45/2001 and Decision No 1247/2002/EC (OJ L 295 of 21.11.2018, p. 39, ELI: <http://data.europa.eu/eli/reg/2018/1725/oj>).

² 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) (OJ L 119 of 4.5.1026, p.1, ELI: <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A32016R0679>).

³ As referred to in Article 11.5 of the Statute of the ECB Sports and Cultural Club.

Personal data will not be published by the Club or a third party.

What is the legal basis for processing your personal data?

The Club and its Sections and Communities offer various activities that can only be provided by making use of personal data. The most important is membership and activity management by Club and its Sections and Communities and the accompanying verification of the eligibility for subsidies of the members of the Club. Personal data are also needed to verify the voting rights for the general and special elections of the Club.

We will use your personal data for the following purposes:

- Administration of your membership, including information about membership or participation fees (if applicable).
- Fulfilment of orders for goods and services from the Club and its Sections and Communities as well as from third-party providers, including for the SCC online shop and any future bookings made through the Sportmember software.
- Statistical analysis of attendance reports of activities.
- Storing your details on the Sportmember member management database. Please note that your own use of the software or system is subject to the [user and personal terms & conditions](#) and [privacy policy](#) from Holdsport.dk.Aps.
- Promoting the Club, its Sections and Communities where we think this will be of interest to you.
- Where this is necessary for our legitimate interests (or the legitimate interests of a third party), and/or where we have received your consent, as applicable.

Your personal data are being processed by the Club when you consent to the processing by providing the personal data included below. You can withdraw your consent at any time by cancelling your membership in the SCC member system (www.sportmember.de). All processing of your personal information will stop once you have withdrawn your consent, but any prior processing will remain lawful.

Who is responsible for processing your personal data?

The ECB Sports & Cultural Club is the controller for the processing of the personal data as defined in Article 1(7) of the GDPR. The Executive Committee of the Club and the Staff Info Point are the processors of the personal data as defined in Article 1(8) of the GDPR. Holdsport.dk ApS is the third party authorised to process personal data as defined in Article 1(10) of the GDPR.

Who will be the recipients of your personal data?

The recipients of the personal data are the members of Executive Committee of the Club, the Committee members of the Sections and Communities of the Club, the Staff Info Point and Holdsport.dk ApS. On a case-by-case basis, personal data may be provided where necessary to third parties in connection with the activities organised by the Club, the Sections and Communities, or for the delivery of goods and services by third parties to the Club and its Sections and Communities.

What categories of personal data are collected by the Club

The ECB Sports & Cultural Club processes the following personal data:

- Last name, First Name
- E-mail address
- Staff ID (if applicable)
- Employment status (Contract type / Relationship to ECB staff member (for spouse/recognised partners and children) / Organisation (for non-ECB eligible members, e.g. EIOPA, ESA and AMLA staff)
- Data in connection with activities for which you have registered as well as pictures taken during these activities.
- Data necessary for the delivery of goods and services by third parties.

Additional personal data may be collected by the Sections and Communities on a case-by case-basis upon consent of the member and only where necessary in relation to the purposes for which they are processed.

For more information we refer to the [privacy statement of Holdsport.dk Aps](#) for www.sportmember.de.

The above personal data are provided upon registration to the Club at www.sportmember.de. The data are verified by the Executive Committee and/or Staff Info Point after a reconciliation exercise against a list containing the above-mentioned data provided by the Human Resources function of the ECB. The Club is not liable for the accuracy and correctness of the data provided.

Will your personal data (in a clear or encrypted form) be processed (e.g. transferred, accessed or stored) in third countries or by international organisations?

The Club does not foresee any transfers of your personal data to third countries or international organisations. For more information we refer to the [privacy statement of Holdsport .dk Aps](#) for www.sportmember.de.

How long will the Club keep personal data?

The personal data are stored as long as you are a member of the Club. Your data will be deleted by the Club upon termination of the membership of the Club (full, associate or guest membership), your personal data will be deleted from the Club on www.sportmember.de.

You may request the deletion of your personal data at any time. In case legal retention obligations prevent deletion, you have the right to have your data blocked.

What are your rights?

You have the right to access your personal data and correct any data that is inaccurate or incomplete. You also have (with some limitations) the right to rectification, the right to erasure of personal data and the right to restriction of processing pursuant to Articles 16, 17 and 18 of the GDPR and the right to object to processing of your personal data pursuant to Article 21 of the GDPR.

Who can you contact in case of queries or requests?

You can exercise your rights by contacting the ECB Sports & Cultural Club (ecb.sportsandculturalclub@ecb.europa.eu).

Addressing the Hessian Data Protection Authority (Der Hessische Beauftragte für Datenschutz und Informationsfreiheit)

If you consider that your rights under the GDPR have been infringed as a result of the processing of your personal data, you have the right to lodge a complaint with the [Hessian Data Protection](#) Authority at any time.