

Privacy Policy

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1. Who is Close the Gap?

Close the Gap is an international non-profit organisation and has its corporate headquarters at Pleinlaan 2, 1050 Elsene with company number BE 0860.353.772.

Close the Gap aims to bridge the digital divide by offering high-quality, pre-owned computers donated by European companies to educational, medical and social projects in developing and emerging countries.

Close the Gap (“us”, “we”, or “our”) operates <http://close-the-gap.org/> (the “Site”). This Privacy Policy informs you of our policies regarding the collection, use and disclosure of personal data we receive from users of the Site.

We process your personal data only for the purposes who are mentioned in this privacy policy.

2. Collection and use of personal data

While using our Site, we may ask you to provide us with certain personal data that can be used to contact or identify you. Personal data may include, but is not limited to, your name. More specifically, depending on the following purposes, we also collect the following personal data:

- If you subscribe to our newsletter, we will use your e-mail address to send you the newsletter.
- If you contact us by e-mail for a general question, we will save your contact details to give you further information and to provide you the most adequate answer to your question.
- If you contact us to donate IT equipment, we will save the following personal data you give to us: name, family name, phone number, email address, address and company.
- If you contact us for a project application, we will save the following personal data you give to us: name, family name, phone number, email address, address and company.

3. Technical and organisational measures to secure personal data

Within Close the Gap information and personal data are very important assets. Within this context, all information systems on which information and personal data is stored will be treated in line with the internal ICT Acceptable Use Policy.

This policy contains the security & privacy measures, who are based on 3 basic principles, namely:

- Close the Gap’s information systems are only to be used for business purposes and reasonable personal use, in accordance with the ICT Acceptable Use Policy.
- Unauthorized access to Close the Gap information and information assets must be prevented at any moment.
- The privacy of personal data must be protected at any moment and during any process, in line with the applicable privacy legislations.

The security of your personal data is important to us but remember that no method of transmission over the Internet, or method of electronic storage, is 100% secure. While we strive to use commercially acceptable means to protect your Personal Information, we cannot guarantee its absolute security.

Close the Gap ensures that users are protected against unauthorised access, modification or use and loss, disclosure or destruction of personal data in its possession. They shall also take other appropriate physical, legal, technical and organisational measures.

Where required and possible, personal data will always be anonymised. These measures are subject to regular internal and external audits to assess their effectiveness.

The employees of Close the Gap undertake all reasonable efforts to respect the provisions of the internal and external privacy regulations of Close the Gap. They also sign a confidentiality declaration, which must be respected after leaving Close the Gap.

4. Sharing of personal data with third parties

Close the Gap will not share your personal data with third parties other than the exceptions listed below or only with the explicit, prior consent of the user.

- Arrow, for organisational reasons regarding collection of computer donations and preparation project orders (personal identification data, electronic identification data & current employment of the donors)
- Bolloré and Brucargo, for organisational reasons regarding shipment of project orders (personal identification data, electronic identification data & current employment of the project leaders in the third countries)
- Mailchimp, that is a marketing automation platform that we use to send our newsletters
- Ricoh is the company that is printing for us.
- Designisdead, the company that takes care of the design of some of our products.
- The hoster of this website, for organizational reasons

WEBSITE	HOST
http://close-the-gap.org/	Kinamo NV

Close the Gap always takes into account that your personal data needs to be processed in a fair, lawful, proportional and transparent manner.

Your personal data will never be used for advertising purposes, nor will it be passed on to third parties who would use this data for such purposes.

Close the Gap provides the necessary personal data if these are requested by an authorised person or body on the basis of a legal provision (e.g.: police services, authorised municipal or provincial civil servant, ...).

5. Rights of the data subject

By means of the contact possibilities mentioned below, you can exercise the following rights regarding the processing of your personal data by Close the Gap, except in cases where this would require a disproportionate effort on the part of Close the Gap:

- To ask information about and access to your personal data;
- To ask for rectification or erasure of your personal data or restriction of processing;
- Right to object to certain kinds of processing activities;
- Right to file a complaint with the supervisory authority (in Belgium: [www.privacycommissie.be /](http://www.privacycommissie.be/) commission@privacycommission.be / Drukpersstraat 35, 1000 Brussel / +32 (0)2 274 48 00 /).

Contact options to exercise your rights:

- You can submit a written, dated and signed application at Close the Gap, Pleinlaan 2, 1050 Elsene;
- You can send an email to peter.manderick@close-the-gap.org.

Provided that proof of identity or a power of attorney has been obtained, Close the Gap can send you your personal data (free of charge).

6. Storage limitation

Close the Gap will ensure that your personal data will not be stored longer than necessary. The retention period depends on the purpose for which they were collected.

In many cases, personal data should be kept for an additional period of time to ensure their availability in case of questions or disputes;

Because Close the Gap strives to offer the tasks imposed by the applicable legislation in such a way that personal data is protected against accidental or malicious destruction, it is possible that Close the Gap, after your personal data have been removed from our applications, remaining copies are not immediately removed from our active applications or backup systems.

Close the Gap treats your personal data in accordance with this Privacy Policy as long as these data are stored.

7. How does Close the Gap ensure compliance with this Privacy Policy?

When Close the Gap receives formal complaints via the above mentioned contact possibilities, they contact the person who submitted the complaint to discuss follow-up actions.

8. How does Close the Gap ensures cooperation with the supervisory authorities?

Close the Gap cooperates with the relevant regulatory authorities, in particular the national supervisory authority, to resolve complaints regarding the transfer of personal data that we cannot resolve directly with our users.

In the event of a judicial investigation or a police request, data may be transferred in accordance with privacy laws, without your prior consent. This will always be under the supervision of the judicial and police authorities and your data will never be transferred for other (e.g. commercial) purposes.

Under certain conditions, information must be transmitted to the administrative authorities responsible for the recovery of tax and social security claims.

9. Changes to this Privacy Policy

This Privacy Policy is effective as of 25 May 2018 and will remain in effect except with respect to any changes in its provisions in the future, which will be in effect immediately after being published on this page.

We reserve the right to update or change our Privacy Policy at any time and you should check this Privacy Policy periodically.

If we make any material changes to this Privacy Policy, we will notify you either through the email address you have provided or by placing a prominent notice on our website.

10. Contact

If you have any questions about this Privacy Policy, please contact us at: peter.manderick@close-the-gap.org.