

Privacy Policy

*of the European Federation of Psychology Students'
Associations (EFPSA)*



efpsa

*European Federation of
Psychology Students' Associations*

What is EFPSA?

The European Federation of Psychology Students' Associations (EFPSA) was established in 1987, at the first International Congress of Psychology Students in Portugal. EFPSA represents a highly diverse network of psychology students working on a voluntary basis by and for psychology students of Europe. The Federation currently consists of 33 psychology member organisations and two observer organisations. Currently EFPSA organises twelve events across Europe. Additionally, EFPSA hosts several online resources and runs its own training service, fully-reviewed, open-access Journal and makes a positive impact on society through our social impact campaigns. Altogether, EFPSA has positioned itself to provide psychology students with unique and exciting opportunities for academic, professional and personal development. In accordance with its Mission, Vision and Values, EFPSA continues to expand its presence and visibility within student communities, refine its activities and develop a portfolio of opportunities and membership for European psychology students with the aim of improving psychology and society, providing the opportunity for academic and social exchange while working towards improving psychology students' experiences. As EFPSA is registered in Brussels, EFPSA will follow the Belgian laws and be under the responsibility of the Belgian authority.

Purpose

This document will discuss both technical and policy related issues which are aligned with the General Data Protection Regulation (EU) 2016/679 (GDPR) which is a regulation in EU law on data protection and privacy for all individuals within the European Union (EU) and the European Economic Area (EEA). The GDPR was adopted on the 14th of April 2016, and was enforced at the 25th of May 2018. EFPSA takes the protection of your data very seriously. Therefore we have a Data Analysis Responsible, who is in charge of collecting and deleting data. It is important for us to create an environment in which everybody feels safe to work, learn, create, collaborate, and develop. Privacy is a crucial aspect of our relationship with

entities involved in any capacity with EFPSA and therefore this document will explain how data is handled in order to achieve our aims while protecting your information.

Information Collected

Website and Cookies

The EFPSA Website uses cookies to improve users' experience. When a user visits a website small text files are placed on that computer and are later read by the same website to help identify the user once they revisit it. These small text files are called Cookies. All collected information are used according to our Privacy Policy which is in line with the EU privacy regulation (General Data Protection Regulation - GDPR, Regulation EU 2016/679). More info about our Privacy Policy can be found here: <https://www.efpsa.org/privacy-policy/> Some cookies are permanent and stay there even when user goes offline, other cookies are temporary and are deleted as soon as the browser is closed.

If you would like to know more about cookies, the cookie law, how to control or delete cookies we suggest you visit <https://www.aboutcookies.org/> or <http://www.youronlinechoices.eu/> for a detailed guidance.

Keep in mind that we never receive any identifying information about you and we will never try to do so in ways that are not clear or ways that might be misleading. Privacy is a value EFPSA endorses.

Below you can find a list of cookies used and the reasons behind why and what they are used for. Once users visit our website they are consenting to the use of these cookies. However, the user can choose to opt out of being tracked either by deleting cookies or by using the browser's anonymous usage setting.

How to opt out?

- **Deleting Cookies** - Click on the menu icon of your browser and go on settings, look for the privacy option and either clear all browsing data or remove all cookies and site data from your content settings.
- **Do not track signal** - Click on settings and tick “do not track” request.
- **Anonymous usage** - Click settings, look for content settings and untick the option to allow identifiers for protected content.

Cookies Used:

- **Google Analytics:** We use Google Analytics to collect information about visitor behaviour on our website. Google Analytics stores information about what pages you visit, how long you are on the site, how you got here and what you click on. This Analytics data is collected via a JavaScript tag in the pages of our site and is **not tied to personally identifiable information**. We therefore, do not collect or store your personal information (e.g. your name or address) so this information cannot be used to identify who you are. With this tool we are able to get useful information about you, our visitors, in order to adjust to your needs. You can find out more about Google’s position on privacy as regards its analytics service at

http://www.google.com/intl/en_uk/analytics/privacyoverview.html.

- **Third-Party Cookies:** Third-party cookies are cookies that are set by a website other than the one you are currently on. For example, if you see a Facebook ‘like’ or ‘share’ button, that ‘like’ button will set a cookie that can be read by Facebook. That would be considered a third-party cookie.

Third-party cookies have their own respective privacy policies and therefore it is recommended that the user is familiar with their policy as some points might not be similar to

EFPSA's Privacy Policy. Each third-party cookie also has information on how to opt out from third party tracking.

The user also has the option to block third party cookies by clicking on browser settings and tick the 'block third party cookies' option under content settings option which will most likely be found under the privacy section.

When an individual uses an EFPSA Service or participates in any EFPSA Event, personal information may be requested using online forms, email correspondence, subscriptions, surveys or applications. These personal information could include: name, surname, email address, phone number, skype name, facebook account, country of origin, postal address, university of studies, year of studies, date of birth, pictures, comments, food preferences. All the collected data will be treated according to the General Data Protection Regulation - GDPR, Regulation EU 2016/679. Find more information about the data we collect below.

Email Subscribers

The Internal Newsletter is sent to members of the EFPSA Working Community through MailChimp, which manages and secures data on specialised servers that [abide by the EU Safe Harbor Framework as outlined by the U.S. Department of Commerce and the European Union](#). All recipients can unsubscribe to these internal newsletters anytime by sending an email to contact@efpsa.org.

Surveys

When collecting data for the purpose of doing an internal survey, we might need certain identifiable, personal information such as name and surname, and EFPSA position. In that case, the people responsible for conducting the survey would have to: state the purpose for the data collection; who has access to the data; what kind of data is being collected; how and by whom

the data will be anonymised; and for how long the data would be stored. The collected data would be analysed on a group level if needed, and all data will be deleted or anonymized upon request.

When collecting data for such purpose, you have to add at the beginning that *“By participating in the survey, I give my explicit consent to the treatment of my data as stated in EFPSA’s Privacy Policy according to the EU privacy regulation (General Data Protection Regulation - GDPR, Regulation EU 2016/679)”*.

When collecting data for the purpose of doing an external survey, all data will be anonymised and treated according to the General Data Protection Regulation - GDPR, Regulation EU 2016/679.

Application Forms

When filling in an EFPSA application form we might require certain identifiable, personal information. This information may include name and surname, mobile number, email address, skype name, country, university, year of studies, proof of studies, food preferences and allergies, postal address, etc.

In that case, the people responsible for handling the application forms would have to state the purpose for the data collection (e.g., to ensure the event goes smoothly), who has access to the data, what kind of data is being collected, how and by whom the data will be anonymized, and how long the data would be stored for. When collecting data for such purpose, you should always add at the beginning: *“By filling in this form I give my explicit consent to the treatment of my data as stated in EFPSA’s Privacy Policy according to the EU privacy regulation (General Data Protection Regulation - GDPR, Regulation EU 2016/679)”*. The reason for the gathering of the data and an explanation on how to request a deletion of data should also be included. These rules apply for all EFPSA Services.

- **Event Applications:** In a case of an Event, an application is filled by the prospective participant. Specific members of the Board of Management and the Organising Committee or persons holding responsible roles will have access to the information for the sake of process facilitation and transparency.
- This information might have to be passed down to the Member Representative of the possible participant's country/region. Member Representatives are also informed of the Privacy Policy by EFPSA and are asked to handle this information with respect and caution. This happens because in some cases, the Member Representative will be responsible for the participants' selection or to inform the applicant about the selection process.
- **EFPSA Position:** When an individual applies for a position in EFPSA several authorised people will be given access to the data given by the applicant to facilitate the selection process. The Board of Management, the coordinator of the team and, in rare cases, current members of the team will participate in the selection process.

Board of Management positions are seen by Member Representatives and the EFPSA Working Community. They are then voted upon by the Member Representatives; who are given the possibility of anonymous voting upon request.

Members of the EFPSA Working Community are encouraged to keep in mind that sometimes individuals responsible for the selection process, of any application, might contact them for enquiries regarding their application. The email address of individuals who are selected will also be added to the EFPSA contact database, from which they can unsubscribe any time they wish to do so by sending an email to datamanagement@efpsa.org. All collected data will be stored by the person collecting the data and solely anonymised only for statistical analysis purposes. Contact information of (ex) members can be stored without having to ask permission unless requested otherwise.

Event Participants

If an applicant is chosen to be a participant in an EFPSA Event:

- The participant must keep in mind that any EFPSA policies will be applied.
- The participant consents to be part of any EFPSA promotional material including pictures or videos. If the participant does not want to part of this promotional material, he can always contact the responsible EFPSA member to be left out the material.
- Some participant information will be kept in EFPSA's archive system such as their name, university and country. Anyone has the right to contact the Data Analysis Responsible (DAR) to ask what kind of his/her personal information are stored in EFPSA's archive system. The DAR needs to have responded within 1 month whether there is information stored from that person and who can see it, what purposes it serves, and what kind of data it is. Furthermore, the DAR has the right to ask for proof of who that person is in order to provide those personal information. If requested, the DAR has to inform the Board of Management about the request or explain why they cannot be deleted, if that is the case (e.g., when someone is still a member of EFPSA Working Community, or was a participant in an event that does not have all of its information archived).

EFPSA Working Community:

- When an applicant applies for an EFPSA position they are required to abide by EFPSA's policy.
- When attending any EFPSA Event; including internal events such as the annual Joint EB & MR Meeting, applicants are automatically subjected to abide by any EFPSA policies.
- Information about members and their role will be stored in EFPSA's archive system. Anyone has the right to contact the Data Analysis Responsible to ask what kind of his/her personal information are stored in EFPSA's archive system. The DAR needs to have responded within 1 month whether there is information stored from that person and who can see it, what purposes it serves, and what kind of data it is. Furthermore, the DAR has the right to ask for proof of who that person is in order to provide those

- personal information. If requested, the DAR has to inform the Board of Management about the request or explain why they cannot be deleted, if that is the case (e.g., when someone is still a member of EFPSA Working Community, or was a participant in an event that does not have all of its information archived).
- As for the Human Resources Responsible, who will have information related to feedback, and e-mails about personal matters within the Federation and the teams (which can be from personal emails, especially for team members that do not have individual EFPSA mail addresses), he/she has to delete these emails and all the collected data by the end of the mandate, so that no one else has access to them. The Data Analysis Responsible will remind that to the HRR at the end of each mandate.
 - Any member of the EFPSA Working Community is asked to be aware of this document and its contents and regulations. Every member is encouraged to respect all EFPSA policies.
 - Every member of the Working Community is asked to sign a Ethical Code of Conduct declaring that any work done or service provided throughout the mandate belongs to the Federation and that any information individuals are exposed to due to their role cannot be used for any other purposes than that have been explicitly stated.
 - Every member of the Working Community may be part of any EFPSA promotional material including pictures or videos. If any participant does not want to part of any EFPSA promotional material, she or he can always contact the responsible EFPSA member to be left out the material.

Ethics Committee

As the Chair of the Ethics Committee, the Immediate Past President (IPP) will have information and receive personal information through its work through the ethics@efpsa.org email address. This information will only be read by the Ethics Committee. Confidential information may be shared anonymously to the Board of Management to properly assess the issue and subsequently manage the situation accordingly. The information will be deleted by the IPP at the end of the mandate.

Human Resources Responsible

The Human Resources Responsible (HRR) will have information receive personal information through its work. This information will only be read by the HRR and information will only be shared under certain circumstances. The information will be deleted by the HRR at the end of the mandate.

How to unsubscribe

Anyone has the right to ask for their personal information to be deleted at any time. The procedure is simple: send an email to the Data Analysis Responsible (datamanagement@efpsa.org) asking for your personal data to be deleted. The DAR has the right to ask for proof of who that person is in order to provide those personal information. If requested, the DAR has to inform the Board of Management about the request or explain why they cannot be deleted, if that is the case (e.g., when someone is still a member of EFPSA Working Community, or was a participant in an event that does not have all of its information archived).

Data leaks, Violations and Updates

A data leak is every event in which a non-authorized person/third-party gains access to data from EFPSA, without having the authority for it. For example: when an EFPSA g-mail address gets hacked, and whoever did it can access personal, non-anonymised data on the drive.

Everybody needs to inform the Data Analysis Responsible if a data leak is discovered. The Data Analysis Responsible will subsequently inform the Belgian authorities in order to protect the privacy of our members.

If an individual feels that their privacy is being violated or that there is misleading information that contradicts any privacy or data protection acts; or functions are not being followed; that individual is entitled to express their opinion and concerns with the President of the Federation and/or the EFPSA Ethics Committee. Discussions about issues raised shall commence and actions will be taken if there are grounds to do so.

If an update of this Privacy Policy is deemed necessary, members of the EFPSA Working Community will be contacted by email 14 days prior of it becoming effective. Information will be published on the EFPSA website to inform the members of any necessary updates.

Due to the importance of this policy we would like to remind all members of the EFPSA Working Community that all ethical aspects of this policy should be respected, and any regulation broken might be subjected to the Ethics Committee decision.