

Privacy Policy

Last updated on 09 March 2018

This Privacy Policy governs the processing of any personal data that a User of this Web site (www.menuhin-foundation.com) provides to the International Yehudi Menuhin Foundation *aisbl/ivzw*, situated at Boulevard du Souverain/Vorstlaan 36, 1170 Brussels, legal registration number 0448.131.981 (“the Organisation”).

By providing personal data on this Web site and/or via the e-mail addresses on this Web site to the Organisation, the User declares to have read and expressly accepted this Privacy Policy, as well as consent to have his/her data processed by the Organisation.

Article 1 – General provisions

- 1.1. The Organisation complies with the Belgian Privacy Act of 8 December 1992 on the protection of privacy in relation to the processing of personal data, as amended by the Law of 11 December 1998 and by the Anti-Spam Provisions in Book XII of the Belgian Code of Economic Law on the “law of the electronic economy”.
- 1.2. By means of this Privacy Policy, the Organisation likewise complies with the European Regulation 2016/679 of 27 April 2016 on the protection of personal data.
- 1.3. The party responsible for the processing of the User’s data is the Organisation.

Article 2 – Personal data

- 2.1. Personal data is defined as:
 - **Category 1** (no registration details): the User’s IP address and surfing behaviour;
 - **Category 2**: registration of the User’s e-mail address to receive the e-Newsletter;
 - **Category 3**: data stored via cookies;
 - **Category 4**: provision of the User’s address details for services rendered by the Organisation.
- 2.2. The Organisation may collect the User’s personal data:
 - a. via the cookies on this Web site;
 - b. when the User surfs on the Web site and he/she registers his/her personal data on the Web site.

Article 3 – Purposes related to the processing of personal data

- 3.1. General purposes:

The Organisation shall use the personal data of the User solely for the following purposes:

 - **Category 1**: to maintain this Web site and to prepare anonymous statistics based on personal data, where the identity of specific persons cannot be determined, the legal

grounds being the legitimate interest of the Organisation to update and improve its Web site and services;

- **Category 2:** to send any direct marketing or promotional materials including e-Newsletters requested by the User, the legal grounds being the User's express prior consent for this;
- **Category 3:** to gather anonymous data by means of cookies, the legal grounds being the User's express prior consent for this (see the Organisation's Cookie Policy);
- **Category 4:** to send any products and/or invoices for products or services requested by the User, the legal grounds being the provision of a product or service requested by the User.

The User is not obliged to provide his/her personal data, but is aware that the refusal to do so will mean that the Organisation may be unable to render specific services requested by the User.

3.2. Direct marketing:

The personal data of the User shall likewise be used for direct marketing purposes of the Organisation on express prior consent by the User, unless otherwise indicated.

If the User is already on the mailing list of the Organisation for receiving promotional materials in hard or soft copy, the Organisation may use the personal data of the User to send promotional materials about the Organisation, its products and/or services. The Organisation may likewise use the personal data provided by the User to adapt documents stored at the Organisation.

The User may freely withdraw his/her prior consent at any time and without any reason, for example by clicking the unsubscribe link at the bottom of every promotional e-mail.

3.3. Transfer to third parties:

In the event of a reorganisation or transfer of activities of the Organisation, including the ceasing of activities or bankruptcy, the personal data of the User may be transferred to new entities or third parties via which the activities of the Organisation may be carried out in full or in part.

The Organisation shall make every reasonable effort to inform the User in the event the Organisation is transferring the personal data of the User to a named third party. Notwithstanding this, the User acknowledges that the Organisation may be prevented from doing so due to technical or Organisational reasons.

The Organisation shall not sell or lease or share or provide the personal data of the User to third parties, except in the afore-mentioned case or in the event of the explicit prior consent of the User.

3.4. Legal requirements:

In certain cases, the Organisation may be requested to provide the personal data of the User in the event of a judicial court order or to comply with any other binding law or regulation. The

Organisation shall make every reasonable effort to inform the User in advance hereto, unless otherwise proscribed by law.

Article 4 – Duration of the processing

The personal data of the User shall be stored and processed by the Organisation for the period which is deemed necessary in accordance with the purposes of the processing and with the contractual relationship between the User and the Organisation.

Article 5 – Rights of the User

5.1. Right of access and inspection:

The User has the right at any time to request access to his/her personal data for free, as well as to obtain information on how his/her data is being used by the Organisation.

5.2. Right of rectification, erasure and restriction:

The User is free to provide or not provide his/her personal data to the Organisation. The User likewise has the right to request the Organisation to rectify, add or delete his/her personal data. The User acknowledges that by refusing to provide his/her personal data or requesting the erasure of his/her personal data, the Organisation will be unable to provide certain products or services to the User.

The User may likewise request the restriction of processing of his/her personal data.

5.3. Right of objection:

The User has the right to object to the processing of his/her personal data on serious and legitimate grounds.

The User likewise has the right to object to the use of his/her personal data for direct marketing purposes. The User is not obliged to provide any grounds for doing so.

5.4. Right of free transfer of data:

The User has the right to obtain a copy of his/her personal data that has been processed by the Organisation in a structured, commonly used and legible format and/or for other uses.

5.5. Right of withdrawal of consent:

Insofar as the processing of personal data is based on the User's prior consent, the User may withdraw his/her consent at any time.

5.6. Exercise of the rights of the User:

The User may exercise his/her rights set forth under articles 5.1 to 5.5 on simple request to the Organisation via email (info@menuhin-foundation.com) or by post (International Yehudi Menuhin Foundation *aisbl/ivzw*, Boulevard du Souverain/Vorstlaan 36, 1170 Brussels), together with a copy of the User's ID card to confirm the identity of the User.

5.7. Automated decision-making and profiling:
The processing of the User's personal data shall not be subject to any profiling or automated decision-making by the Organisation.

5.8. Right to complaint:
The User has the right to lodge a complaint in respect of processing of his/her data by the Organisation to the Belgian Privacy Commission: Commission for the Protection of Privacy, Drukpersstraat 35, 1000 Brussel, Tel +32 (0)2 274 48 00, Fax +32 (0)2 274 48 35, e-mail: commission@privacycommission.be.

This is without prejudice to the right of the User to seek recourse in the Civil Court of Brussels. If the User should suffer any damage as a result of the processing of his/her personal data by the Organisation, the User may claim compensation for these damages from the Organisation.

Article 6 – Security and confidentiality

6.1. The Organisation has taken the necessary security measures at technical and organisational levels to minimise the risk of destruction, loss, or falsification of and alterations to the personal data, as well as any unauthorised access or processing of the data collected, including accidental disclosure to third parties.

6.2. On no account may the Organisation be held liable for the direct or indirect damages resulting from accidental or unlawful use of the personal data by third parties.

6.3. The User shall comply with security requirements at all times, *inter alia* by ensuring no unauthorised access to his/her login and password details, if relevant. The User is solely responsible for accessing the Web site by means of the User's computer, the User's IP address and the User's identity, and for maintaining confidentiality hereof.

Article 7 – Access by third parties

7.1. In order to process the User's personal data, the Organisation shall provide its members of staff access to the data.

7.2. The Organisation shall strive to guarantee a level of protection that is comparable to that set out in this Privacy Policy by ensuring that the contractual obligations are binding on its members of staff and appointees.

7.3. The Organisation provides links on its Web site to external social media sites where it provides specific information to the public. When the User chooses to click on any of these links and surf to an external site, the User's data will be processed by the relevant external party and be subject to the privacy policy of the external party. In such cases, the Organisation is not responsible for data collected and used by the external party.