



# Privacy statement of AEHT Asbl

## 1 General information

<b>Last updated</b>	20 August 2019
<b>Our commitment</b>	The European Association of Hotel and Tourism Schools (AEHT) is committed to protecting your privacy and ensuring the protection of your personal information. This privacy statement explains the type of personal data (hereafter called PII, personal identifiable information) we collect and how we use, disclose and protect it.
<b>What does this statement cover?</b>	This statement on privacy applies to all PII that we processed, except for PII of our internal employees.
<b>Who is responsible for your data?</b>	The AEHT ASBL is responsible for your PII and ensures compliance with the regulations. You can contact AEHT under email : <a href="mailto:secretariat@aeht.lu">secretariat@aeht.lu</a> or phone number : (+352) 2680 3003.
<b>How to change these rules?</b>	We may change this privacy statement by posting an updated version on our website <a href="http://www.aeht.eu">www.aeht.eu</a> .

## 2 Our Privacy Principle

AEHT takes privacy seriously. The following five principles are at the basis of our service approach to respect your privacy:

1. We always use your PII in a **fair, trustworthy and transparent way** for specified, explicit and legitimate purposes.
2. You have the right to be **clearly informed** about how we use your PII. We will always collect your data with a **clearly defined purpose** and we will always be transparent to you about the data we collect and the way we use it.
3. If you have concerns about how we use your PII, we are pleased to assist you in understanding our data processing operations.
4. We will take all reasonable steps to **protect** your information from abuse and to keep it safe.
5. We are committed to the European and to national privacy **regulations** and we cooperate with our national supervisory authority (in Luxembourg the CNPD – the National Commission for Data Protection) regarding privacy, where necessary.



## 3 Purposes and lawfulness

The prime objective of AEHT is promoting a European outlook among Hotel and Tourism Schools, by:

- encouraging contacts between schools throughout Europe,
- promoting better knowledge of other countries' education system,
- facilitating exchanges of teachers and students,
- forging closer links between schools and the Profession,
- easing partner researches for transnational training projects, and
- sharing teaching methods and materials, skills and knowledge,
- giving first professional experiences to youngsters in a multinational and – cultural environment to boost their career perspectives.

To meet these aims, we require a series of data, including some personal data, especially when organizing events and other meetings and activities, which need to be shared among AEHT member schools and partners to guarantee the smooth-running of these activities. In no case, the AEHT rents or sells collected PII with entities that are not member of the association.

According to our general conditions, we collect your data from authorized persons (AEHT database account manager) from your school. We process your data based on the consent that you gave to this authorized person when she or he enrolls you in our system. This consent can be given orally but is collected and stored by the authorized persons or his delegates (your teachers), before any registration in our database. This applies also to services such as registration for the receipt of newsletters, data updates and other information about AEHT content, events and publications. To conclude, we process your data based on the consent you gave to your school representative when registering your data in our database.

In general, events are considered public and pictures may be taken and shared on social media, Internet sites, videos and prints in full respect of privacy issues. Such pictures are part of our documentation of events for historic and promotional purposes. In other words, your registration to our events and activities constitutes your consent to the taking of pictures of you and their publication in the European press, in our printed publications, and publications on Internet and in social networks.

## 4 Privacy policy rules at AEHT

### 4.1 How do we collect your consent?

If we collect your PII via the school representative, we rely on this representative to have your consent for this registration. The date of registration is considered as the date of consent, even if for practical reason the representative may register you some time later than your oral or explicit consent. AEHT insists in bringing to your attention that registrations to our events is optional, but requires previous consent - explicit or implicit - according to national legal requirements, by students or their legal representative. It is the responsibility of the organization (school) to which the person belongs to obtain this consent prior any registration.

### 4.2 How you can withdraw your consent or correct your data?

If you do not want anymore that we process your data or use pictures of you in future publications, you can withdraw your consent at any time without inconvenience. This does not apply if you register for a paid event or meetings, in which case registration is a contractual commitment that may require a cancellation fee before your data can be withdrawn from our system.



You may either ask your school's AEHT account manager or data protection officer, who has access to your school's AEHT account, to proceed to <https://www.aeht.eu/db/login.php> and make the requested operation (updates, additions, rectifications, withdrawal).

You can also send a request by email to [secretarait@aeht.lu](mailto:secretarait@aeht.lu) including a proof that the request to change or withdraw the personal data or some pictures emanates from the person concerned.

### **4.3 To whom do we transfer your data?**

For events organized under the aegis of the AEHT (Annual Conferences, Christmas in Europe events, Youth Parliaments, HEG Seminars), the AEHT Head Office collects, records, uses and transfers your data to the organizing school. The data transferred may only be used for logistic, informative and statistical purposes and not for commercial ones, and once transferred, the processing of your data will then fall under the responsibility of the organizing school. The AEHT disclaims any responsibility of abusive use by organizing schools of personal data put at their disposal by the AEHT.

As information to you that your email is in our database, we send you several times a year an email containing a link to our newsletter as well as information on our events, which you have the choice to open or not regarding your interest in the kind of information specified under 'subject'.

### **4.4 Do we transfer your data to other countries?**

We do not transfer any of your personal information to servers outside the European economic area (EEA) or to a country not subject to the EU Commission's standard contractual clauses, except, if legitimate, to member schools that are located outside EEA.

We use subcontractors such as IT management who undertake to keep your data on EEA territory and we ensure that processing activities are covered by a European Commission adequacy decision regarding the privacy issues. For further information about our subcontractors you may contact our secretariat.

### **4.5 How do we protect your PII?**

We take reasonable security measures to protect your personal information at any times and require any third party who handles or processes your PII for us to do the same.

If AEHT collaborates with other companies, the choice of these companies will only be made after a complete selection process. In this selection process, each individual service provider is carefully selected for its relevance in terms of technical and organizational data protection expertise. This selection process will be documented and a contract for the processing of contractual data will only be concluded if the service provider complies with the identified security requirements, including European and national regulatory requirements.

Access to your PII is restricted to prevent from unauthorized access, modification or misuse, and is only permitted to our staff/collaborators who need it for their work.

### **4.6 Specific processing of visitors to our website**

#### **Cookies**

Our websites use technologies such as 'cookies' or other web tools to help us improve your experience and our services. These technologies help us to better understand user behaviour, tell us which parts of our website users have visited, and facilitate and measure the effectiveness of your experience. Although some of these technologies are necessary for communication



purposes or to provide you with our core services and as such do not explicitly require your consent, we will inform you herewith of their use.

Most browsers are set to automatically accept cookies. In general, you can prevent the storage of cookies on your hard disk by selecting 'Do not accept cookies' in your browser settings. You can also configure your browser to ask permission before storing cookies. Finally, you can delete previously set cookies at any time. Please refer to the instructions of your browser on how to implement this measure. If you set your privacy setting as such, however, it may happen that you cannot fully use all the features of our website.

## Use of Google Analytics

Our website may use Google Analytics. This is a service for analysing accesses to websites of Google Inc. ('Google') and allows us to improve our internet presence. The information collected by means of a cookie (IP address, access time, access duration) is transmitted to Google servers in the USA and stored there. The evaluation of their activities on our website is transmitted to us in the form of reports. Google may pass on the collected information to third parties, if required by law or if third parties process this data on behalf of Google. However, to avoid Google to have an eventual direct personal link to you, we use the function 'anonymized'. Thus, IP addresses are processed only shortened. Please be aware, that by using our website, you agree to the processing of the data collected about you by Google.

Please note that some browser extensions exist which allow you to disable and control Google Analytics tracking.

## Marketing and advertising

In addition to providing our services, and subject to acceptance of our newsletters by the user (see point 3), we will use your PII to communicate with you about our offers and those of **our** (academic and professional) members as well as to recommend other services that may interest you. In particular, these offers may contain references to new service offers in line with the present processing purposes.

If you do no longer wish to receive these recommendations or newsletters from us, you may at any time opt out of our database, and thus mailing list (<https://www.aeht.eu/db/login.php>, or by contacting us) (see point 4.2) or by contacting our secretariat.

### 4.7 What are your rights and how can you exercise them?

If you have any questions, comments or concerns about how we handle your PII, you can contact the data controller, the managing director or the data protection officer directly.

You have the right to:

1. receive a structured copy of your PII we process;
2. ask us to correct, update or delete your PII from our records;
3. report to us any misuse of your PII;
4. totally or partially withdraw your consent to the PII processing.

If you feel that your PII has not been processed in accordance with the law, you should contact our secretary ([secretariat@aeht.lu](mailto:secretariat@aeht.lu)) for clarification. You may also refer your complaint to our national data protection authority in Luxembourg, the CNPD ([www.cnpd.lu](http://www.cnpd.lu) or [databreach@cnpd.lu](mailto:databreach@cnpd.lu)).