



## My-Europa Privacy Policy

Status as of September/14/2011

### Content

1. Introduction
2. Scope and purpose of the collection, processing and use of personal data upon visiting My-Europa's website
3. Information received
4. Sharing Information on My-Europa
5. Sharing Information with Third Parties
6. Using your Information
7. Sharing Information
8. Changing and Removing Information
9. Protecting your Information
10. Other Terms

### 1. Introduction

The mission of My-Europa is to connect the Europe's professionals, individuals and students to enable them to be more productive and successful. We work to fulfil this mission by helping you, your connections, and millions of other professionals meet, exchange ideas, learn, make deals, find opportunities or employees, work, use cloud project management tools and make decisions in a network of trusted relationships and groups. Being part of My-Europa means sharing information about yourself with other professionals, individuals, students and communicating with them, as well as working privately on your own. Consequently, My-Europa Platform pays attention to preserve your privacy. Namely you can keep the control on your informations through:

- a. updating data at any time,
- b. deciding to who you want to share your data,
- c. keeping your data in our website and not sharing it with other websites.

In order to achieve these goals, we secure that:

- We do not rent, sell, or otherwise provide your personally identifiable information to third parties for marketing purposes.
- We do not share any information you have not chosen to display on your My-Europa profile to other parties, unless compelled by law, or as necessary to enforce our User



# European Projects Association asbl

---

Agreement or protect the rights, property, or personal safety of My-Europa, its Users, and the public.

- All information that you provide will be protected with industry standard protocols and technology.

My-Europa Platform reserves the right to modify this Privacy Policy at any time. In case of Privacy Policy modification, an e-mail shall be sent to users by my EPA or a notice shall be published on the home page. As a result, users are invited to verify our Privacy Policy in order to accept the new version.

## **2. Scope and purpose of the collection, processing and use of personal data upon visiting My-Europa's website**

### **Upon visiting EPA's website**

Each time someone visits our website, our servers temporarily store information about the accessing agent in a log file. In the course of this procedure, the following data is collected and stored, without any action on your part, until the time of deletion: the IP address of the accessing computer, the date and time of access, the name and URL of the retrieved file, the website from which access is made, the operating system of your computer and the browser used by you as well as other technical data, the name of your Internet Access Provider, your language configuration and geographical origin. This data is collected and processed for the purpose of enabling visitors to use our website (to establish a connection), to permanently guarantee the security and stability of the system, to enable the technical administration of the network infrastructure and the optimisation of our internet offer as well as for internal statistical purposes. The IP address shall only be analysed in case of attacks against EPA's network infrastructure and for statistical purposes.

### **Upon the registration as a user with EPA**

Personal data for the creation and completion of the profile on EPA is provided on a voluntary basis. Nonetheless, the accurate input of certain data is crucial.

This data includes: a user name, a password, your name, gender and birth date, and if applicable the name of your company, your full address, your e-mail address and telephone number.

This data is necessary for the development and administration of My Europa-Platform, for checking the plausibility of the entered data and the user's legal capacity, i.e. his capacity with regard to the establishment, organisation of content, the maintenance and modification of the contractual relationship in the course of use of EPA and for eventual inquiries. Furthermore, this data is essential for the preparation of the content of service contracts concluded via EPA.



## **Using EPA as a registered user**

During the use of EPA by registered users, we collect data for statistical reasons to ensure the uninterrupted functionality of EPA, to fix malfunctions, for a better understanding of users' needs and subsequent product optimizations and personalization, and to display such data to other users. This includes, in particular, project postings or bids and if applicable payment information.

## **Disclosure, correction, blocking and deletion of your data**

You may request information about your personal data at any time, or view and change such data in your public profile by logging in to the online Platform. Your data shall be deleted upon termination of the contract.

## **Data security**

We apply appropriate technical and organisational security measures in order to protect your personal data against manipulation, partial or full loss and against unauthorised access by third parties. Our security measures are continuously being improved in keeping with technological developments.

## **3. Information received**

### ***Providing your information to the Platform:***

#### **Information About Yourself**

During the registration process on My-Europa, you are invited to provide us with your name, email, gender, birth date, full address and telephone number. You will also be able to add a picture of yourself. Once you are registered, you are enabled to add further informations about yourself. In any case, you are enabled to share only some informations.

#### **Content**

If you do not want us to store metadata associated with content you share on My-Europa (such as photos), please remove the metadata before uploading the content.

#### **Transactional Information**

The details of transactions or payments made on and for My- Europa may be retained. In case of disagreement, you shall remove your payment source and your account number.

### ***Information collected during interacting with My-Europa:***

#### **Site activity information**



# European Projects Association asbl

---

We keep track of some of the actions you take on My-Europa, such as adding connections (including joining a group or adding a friend), creating a photo album, indicating you "like" or "dislike" a post, attending an event, working on project, creating project, including people on projects, get included in project or connecting with an application. In some cases you are also taking an action when you provide information or content to us.

## **Access Device and Browser Information**

When you access My-Europa from a computer, mobile phone, or other device, we may collect information from that device regarding your browser type, location, and IP address, as well as the pages you have visited.

## **Cookies Information**

Cookies are alphanumeric information files, which your browser automatically saves to the hard drive of your computer whenever you visit our website. In many respects, cookies help to make your visit to EPA simpler, more enjoyable and more worthwhile. For example, we use them to store your login ID (but never your password) to make it easier for you to login whenever you come back to My-Europa. We also use them to confirm that you are logged into My-Europa, and to know when you are interacting with My-Europa Platform applications and websites, our Share buttons, and our advertisements. You can remove or block cookies using the settings in your browser, but in some cases that may impact your ability to use My-Europa.

## ***Information we receive from third parties:***

### **My-Europa Platform**

We do not own or operate all the applications or websites that you use through My-Europa Platform (such as information's, news, applications in mall and utilities). Whenever you connect with a Platform application or website, we will receive information from them, including information about actions you take. In some cases, in order to personalize the process of connecting, we may receive a limited amount of information even before you connect with the application or website.

### **Information from other websites**

Programs with advertising partners may be instituted in order to share information with us:

- We may ask advertisers to tell us how our users responded to the ads we showed them (and for comparison purposes, how other users who didn't see the ads acted on their site).
- This data sharing, commonly known as "conversion tracking", helps us measure our advertising effectiveness and improve the quality of the advertisements you see.
- We may receive information about whether or not you have paid attention or interacted with certain ads on other sites in order to measure the effectiveness of those ads.



# European Projects Association asbl

---

- If in any of these cases we receive data that we do not already have, we will "anonymize" it within 180 days, meaning we will stop associating the information with any particular user.

## Information from other users

We may collect information about you from other My-Europa users, such as when a friend tags you in a photo, video, event or place, provides friend details, or indicates a relationship with you.

## 4. Sharing information on My-Europa

This section explains how your privacy settings work, and how your information is shared on My-Europa. You should always consider your privacy settings before sharing information on My-Europa.

### Contact Information

Your contact information settings control (available when customizing your privacy settings) who can contact you on My-Europa, and who can see your contact information such as your email and phone number(s). Remember that none of this information is required except for your email address, and you do not have to share your email address with anyone.

### How to Post

You can select a privacy setting for every post you make using the publisher on our site. Whether you are uploading a photo or posting a status update, you can control exactly who can see it while you create it.

### Gender and Birth Date

In addition to name and email address, your gender, location and birth day shall be required during the registration process.

### Other

Some provisions shall be reminded and remembered:

- Some of the content you share and the actions you take will show up on your friends' home pages and other pages they visit. You can use your privacy settings to limit which of your information is available to "public".
- If another user tags you in a photo or video or at a place, you can remove the tag.
- Even after you remove information from your profile or delete your account, copies of that information may remain viewable elsewhere to the extent it has been shared with others.
- Information might be re-shared or copied by other users.



- Certain types of communication that you send to other users cannot be removed, such as messages.
- When you post information on another user's profile or comment on another user's post, that information will be subject to the other user's privacy settings.
- If you use an external source to publish information to My-Europa (such as a mobile application or a Connect site), you should check the privacy setting for that post, as it is set by that external source.

## **"Publicly" Information**

Information set to be "publicly". Namely, information declared to be available to all, such as your name, profile picture and connections. Such information may, for instance, be accessed by everyone on the Internet (including people not logged into My-Europa), be indexed by third party search engines, and be imported, exported, distributed, and redistributed by us and others without privacy limitations.

Such information may also be associated with you, including your name and profile picture, even outside of My-Europa, such as on public search engines and when you visit other sites on the internet. The default privacy setting for certain types of information you post on My-Europa is set to "publicly".

You can review and change the default settings in your privacy settings. If you delete "publicly" content that you posted on My-Europa, we will remove it from your My-Europa profile, but have no control over its use outside of My-Europa.

## **5. Sharing Information With Third Parties**

### **My-Europa Platform**

Your personal data is forwarded/displayed to third parties only to the extent that this is permitted by your profile settings. Beyond that, we shall forward your personal data to third parties only if there is a legal obligation for us to do so.

### **Connecting with an Application or Website**

Various tools are made available to users in order to control how their information is shared with applications and websites that use Platform. For example, you can block all platform applications and websites completely or block specific applications from accessing your information.

You should always review the policies of third party applications and websites to make sure you are comfortable with the ways in which they use information you share with them. We do not guarantee that they will follow our rules.

### **Pre-Approved Third-Party Websites and Applications**



# European Projects Association asbl

---

In order to provide you with useful social experiences off of My-Europa, we occasionally need to provide General Information about you to pre-approved third party websites and applications that use Platform at the time you visit them (if you are still logged in to My-Europa). Similarly, when one of your friends visits a pre-approved website or application, it will receive General Information about you so you and your friend can be connected on that website as well (if you also have an account with that website). In these cases we require these websites and applications to go through an approval process, and to enter into separate agreements designed to protect your privacy. You can disable instant personalization on all pre-approved websites and applications using your Applications and Websites privacy setting. In addition, if you log out of My-Europa before visiting a pre-approved application or website, it will not be able to access your information.

## **Links**

When you click on links on My-Europa you may leave our site. We are not responsible for the privacy practices of other sites, and we encourage you to read their privacy statements.

## **6. Using of Your Information**

We use the information we collect in order to provide a safe, efficient, and customized services.

### **To manage the service**

We use the information we collect to provide our services and features to you, to measure and improve those services and features, and to provide you with customer support. We use the information to prevent potentially illegal activities. We also use a variety of technological systems to detect and address anomalous activity and screen content to prevent abuse such as spam. These efforts may on occasion result in a temporary or permanent suspension or termination of some functions for some users.

### **To contact you**

We may contact you with service-related announcements from time to time. You may opt out of all communications except essential updates on your account notifications page. We may include content you see on My-Europa in the emails we send to you.

### **To serve personalized advertising to you**

We don't share your information with advertisers without your consent. (An example of consent would be if you asked us to provide your shipping address to an advertiser to receive a free sample.) We allow advertisers to choose the characteristics of users who will see their advertisements and we may use any of the non-personally identifiable attributes we have collected (including information you may have decided not to show to other users, such as your birth year or other sensitive personal information or preferences) to select the appropriate audience for those advertisements. For example, we might use your interest in



soccer to show you ads for soccer equipment, but we do not tell the soccer equipment company who you are. Even though we do not share your information with advertisers without your consent, when you click on or otherwise interact with an advertisement there is a possibility that the advertiser may place a cookie in your browser and note that it meets the criteria they selected.

## **To serve social ads**

We occasionally pair advertisements we serve with relevant information we have about you and your friends to make advertisements more interesting and more tailored to you and your friends. For example, if you connect with your favorite company's page, we may display your name and profile photo next to an advertisement for that page that is displayed to your friends. We only share the personally identifiable information visible in the social ad with the friend who can see the add.

## **To supplement your profile**

We may use information about you that we collect from other My-Europa users to supplement your profile (such as when you are tagged in a photo or mentioned in a status update). In such cases we generally give you the ability to remove the content (such as allowing you to remove a photo tag of you) or limit its visibility on your profile.

## **To make suggestions**

We use your information, including the addresses you import through our contact importers, to make suggestions to you and other users on My-Europa. For example, if another user imports the same email address as you do, we may suggest that you add each other as friends. Similarly, if one of your friends uploads a picture of you, we may suggest that your friend tag you in the picture. We do this by comparing your friend's pictures to information we've put together from the photos you've been tagged in. We may also suggest that you use certain tools and features based on what your friends have used.

## **To help your friends find you**

We allow other users to use contact information they have about you, such as your email address, to find you, including through contact importers and search.

## **Memorializing Accounts**

If we are notified on this email [administration@europeanprojects.org](mailto:administration@europeanprojects.org) that a user is deceased, we may memorialize the user's account. In such cases we restrict profile access to confirmed friends, and allow friends and family to write on the user's Wall in remembrance. We may close an account if we receive a formal request from the user's next of kin or other proper legal request to do so.

## **7. Sharing your Information**



## **When you make a payment**

When you make payments on My-Europa, we will share transaction information with only those third parties necessary to complete the transaction. We will require those third parties to agree to respect the privacy of your information.

## **When you invite a friend to join**

When you ask us to invite a partner to join My-Europa, we will send your friend a message on your behalf using your name. The invitation may also contain information about other users your friend might know. We may also send up to two reminders to them in your name. You can see who has accepted your invitations, send reminders, and delete your friends' email addresses.

## **When you choose to share your information with marketers**

You may choose to share information with marketers or electronic commerce providers that are not associated with My-Europa through on-site offers. This is entirely at your discretion and we will not provide your information to these marketers without your consent.

## **To help your friends find you**

By default, we make certain information you have posted to your profile available in search results on My-Europa to help your friends find you. However, you can control who can see some of this information, as well as who can find you in searches, through your privacy settings. We also inform partner with email and instant messaging providers to help their users identify which of their contacts are My-Europa users, so that we can promote My-Europa to those users.

## **To give search engines access to publicly available information**

We generally limit search engines' access to our site. We may allow them to access information set to the "public" setting (along with your name and profile picture) and your profile information that is visible to everyone. You can change the visibility of some of your profile information using the customize section of your privacy settings.

## **To advertise our services**

We may ask advertisers outside of My-Europa to display ads promoting our services. We may ask them to deliver those ads based on the presence of a cookie, but in doing so will not share any other information with the advertiser.

## **To offer joint services**

Services may be provided jointly with other companies. If you use these services, we may share your information to facilitate that service.

## **To respond to legal requests and prevent harm**



Disclosure of information shall be possible pursuant to subpoenas, court orders, or other requests (including criminal and civil matters). This may include sharing information with other companies, lawyers, courts or other government entities.

## **Transfer in the Event of Sale or Change of Control**

If the ownership of all or substantially all of our business changes, we may transfer your information to the new owner so that the service can continue to operate. In such a case, your information would remain subject to the promises made in any pre-existing Privacy Policy.

## **8. Changing and Removing Information**

### **Editing your profile**

You may change or remove your profile information at any time by going to your profile page and clicking "Edit My Profile." Information will be updated immediately.

### **Delete uploaded contacts**

If you use our contact importer to upload addresses, you can later delete the list. You can delete the email addresses of friends you have invited to join My-Europa.

### **Deactivating or deleting your account**

In case of deactivation or removal of your account: the other user will not be enabled to see you anymore. However, my Europa-Platform will keep your profile information (connections, photos, etc.) in case you later decide to reactivate your account. When you delete an account, it is permanently deleted from My-Europa. If you want to delete your account if you are certain you never want to reactivate it.

### **Limitations on removal**

Even after you remove your information from your profile or delete your account, copies of that information may remain viewable elsewhere to the extent it has been shared with others. However, your name will no longer be associated with that information on My-Europa. Additionally, we may retain certain information to prevent identity theft and other misconduct even if deletion has been requested. If you have given third party applications or websites access to your information, they may retain your information to the extent permitted under their terms of service or privacy policies. But they will no longer be able to access the information through our Platform after you disconnect from them.

### **Backup copies**

Removed and deleted information may persist in backup copies for a certain period of time set up by the law of the Kingdom of Belgium, but will not be available to others.



## **Non-user contact information**

If a user provides your email address to us, and you are not a My-Europa user but you want us to delete your address, you can do so. However, that request will only apply to addresses we have at the time of the request and not to any addresses that users provide to us latter.

## **9. Protecting your information**

### **Data security**

We keep your account information on a secured server behind a firewall. We also use automated and social measures to enhance security.

### **Risks inherent in sharing information**

We are not responsible for third party circumvention of any privacy settings or security measures on My-Europa. Although, the user is invited to use common sens security practices such as choosing a strong passwords for different services, and using up to date antivirus software.

### **Report Violations**

Any security violations should be report to us on this email:

[administration@europeanprojects.org](mailto:administration@europeanprojects.org)

## **10. Other Terms**

### **Changes**

We may change this Privacy Policy pursuant to the procedures outlined in the My-Europa. Unless stated otherwise, our current privacy policy applies to all information that we have about you and your account. If we make changes to this Privacy Policy we will notify you by publication here. If the changes are material, we will provide you additional, prominent notice as appropriate under the circumstances.

### **Consent to Collection and Processing in the Europe**

By using My-Europa, you consent to having your personal data transferred to and processed in the Europe.