SGI-BEL Privacy Notice

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1. Introduction

Privacy and personal data protection regulations apply to the processing of your data, in particular EU Regulation 2016/679 of 27 April 2016 on the protection of individuals with regard to the processing of personal data and on the free movement of such data (General Data Protection Regulation or "GDPR").

In accordance with these regulations, you will find below information relating to the processing we carry out in the course of our activities.

For any questions relating to our privacy notice or to exercise any of your rights regarding your personal data, you can contact us by registered mail at the postal address mentioned below or by email at the following address: privacy@sgi-bel.org

2. Who is responsible for processing your personal data?

Personal data is processed by Soka Gakkai International Belgium ASBL, abbreviated SGI-BEL ASBL, whose registered office is located at 1070 Brussels, Rue Grisar, 46 (ECB: 445.120.231).

SGI-BEL exists to practice and study Nichiren Daishonin Buddhism as promoted by Soka Gakkai globally. Thus, SGI-BEL aims to promote peace, culture and education in a spirit of tolerance and dialogue. It offers moral assistance based on Nichiren Daishonin Buddhism as promoted by Soka Gakkai globally.

In order to achieve its purpose, the activities of SGI-BEL include the organization, in particular, of courses, meetings, celebrations or other activities, as well as trips and seminars. In pursuit of its purpose, SGI-BEL may undertake all ancillary activities, including the publication and sale of books, periodicals and other documents as well as the sale of objects related to the practice of Buddhism.

3. What personal data do we collect?

We collect your data either through cookies or through your contacts with us.

a) Processed data not belonging to a particular category of data

SGI-BEL may be required to process data that does not belong to a particular category of data, such as:

- Contact details (e.g. last name, first name, telephone number, email, address, postal code, city, emergency contact person, level of education, occupation, identity card or passport number, etc.);
- The dates of your requests relating to SGI-BEL;
- Your preferences and interests (e.g. brands of products and services, schedules, etc.);
- Your gender;
- Your questions/comments/communications;
- Photos taken while attending events or meetings;
- Various information that may be exchanged between you and leaders within the organisation or with the SGI-BEL administrative staff;

- Bank account information in connection with a donation or participation in a seminar, training course, etc.

b) Processed data relating to special categories of data

Due to the very nature of SGI-BEL, SGI-BEL is also required to process data belonging to special categories of personal data, such as:

- Religious or philosophical beliefs;
- Health data.

Data subjects, on their own behalf or as holders of parental authority, explicitly and unequivocally acknowledge giving their consent to the processing of their particular data and/or those of their child/person over whom they have authority by SGI-BEL, in compliance with this personal data protection policy. The consent of the data subject may be withdrawn at any time.

Not giving consent or withdrawing consent with regard to the processing of data belonging to special categories of personal data may, however, have the effect of preventing the data subject from fully enjoying the activities proposed by SGI-BEL.

4. Why do we process your personal data?

The personal data you provide to SGI-BEL may be processed for the purposes listed below.

a) To know and manage the preferences of our members and interested non-members

We carry out cross-checks, analyses and combinations of data, for example:

- Qualification of our database relating to our members and interested non-members (by "qualification" we mean the regular updating of our database);
- Establishment of statistics and reporting.

The purpose of these operations is to have a better understanding of the needs and wishes of our members and interested non-members.

These operations allow us to:

- Customize our communication to carry out information operations, send invitations to events and propose materials related to our activities;
- Optimize the activities we offer by helping us to foresee and anticipate the future needs and behaviours of our members and interested non-members.

b) To communicate with our members and interested non-members outside of contractual relationships or requests for pre-contractual measures

The processing of your personal data allows us to communicate with you, in particular to:

- Manage your requests sent by mail or to https://sgi-bel.org (requests for explanations relating to SGI-BEL, information, etc.) and respond to said requests;

- Respond in a more general way to your requests for information, etc., that may reach us through other channels (e.g.: telephone call from a data subject);

- Inform you about our association; in particular by email or by publishing a brochure, magazine, etc.;

- Manage unsubscribe requests for emails, promotions and surveys;

c) To manage the relationship with our members and interested non-members and all that it entails, in particular:

We process your data in the context of pre-contractual and contractual relationships, which include, among other things:

- Responding to your requests for pre-contractual measures (e.g. request for information);

- Execution of SGI-BEL's missions towards its members and interested non-members.

- Execution of contracts established;

- Communication in the context of requests for pre-contractual measures or contracts established;

- Management of donations from members and interested non-members.

d) To handle complaints

The processing of your personal data allows us to manage any complaints you may wish to communicate to us.

e) To protect its rights in court

SGI-BEL may have to process the data of data subjects in order to assert or defend its rights in court (e.g.: conflict over data processing, behaviour of a member or interested non-member or any other legal proceedings, including administrative courts).

f) To secure and improve your use of our website https://sgi-bel.org, in particular:

We process your data for the following purposes:

- Improving navigation, in particular by adapting the paths and content offered to Internet users;

- Implementation of security.

SGI-BEL regularly implements and updates administrative, technical and physical security measures to protect your information from unauthorized access, loss, destruction or alteration. Some of the safeguards we use to protect your information are firewalls and data encryption, as well as information access controls.

SGI-BEL also regularly deletes collected data that is no longer useful to achieve the purposes defined in this notice.

g) To take into account your rights to the protection of your personal data

As detailed below (see "Your rights" section below), the protection of your personal data is an important value of SGI-BEL. We therefore also process your data to allow you to exercise your rights with us.

h) To comply with applicable legislation, in particular with regard to fraud prevention

SGI-BEL may process your personal data for the purposes of fraud prevention, risk assessment, compliance with regulations, investigation, product development, research, analysis and assistance of members and interested non-members.
SGI-BEL uses automated methods whenever possible. However, SGI-BEL may need to manually review certain communications, such as for fraud investigations.

5. What is the basis for the processing and how long will your personal data be kept?

SGI-BEL ensures that the processing of your personal data is lawfully organised in accordance with Article 6 of the GDPR.

Your personal data are kept for the duration necessary to achieve the purposes pursued and in any case until expiry of the mandatory legal retention periods, in particular in tax and accounting matters and until the end of the limitation period for contractual liability.

Your data will be deleted when:

- They are no longer necessary for the purpose pursued; or
- You have validly exercised your right to erasure; or
- You have withdrawn your consent, when the processing is based on the lawfulness of said consent.

Hereafter we detail certain specific fundamentals and the data retention periods with regard to these fundamentals.

a) Managing our relationship with our members and interested non-members

i) Communicating with our members and interested non-members as part of the association's activities

Dispatch of the electronic newsletter and any email or telephone call is done on the basis of the consent of the data subject, who may withdraw his consent at any time by simple request to the postal or electronic address of SGI-BEL. The request must specify that it is a request concerning SGI-BEL. The latter reserves the right to verify the identity of the requester in order to protect the data subject.

Non-digital forms of communication (e.g. sending postal mail) are based on the legitimate interests of SGI-BEL; however, the data subject may object to the processing of their data on this basis if their interests or fundamental rights and freedoms prevail over said legitimate interests of SGI-BEL.

The data used for these information purposes are kept for a maximum of 5 years from the date of last contact with the person, including a click by the person on a hypertext link relating to an action of SGI-BEL.

ii) Managing the relationship and complaints between the association and the member or interested non-member and all that it implies, in particular,

The processing of personal data is based here on the necessity for proper performance of the duties and prerogatives that you have as a member or interested non-member or when it is necessary for the execution of measures taken at your request.

The data is kept for the duration of the relationship and, at the latest, until the end of it, without prejudice, however, to other reasons that could allow or oblige SGI-BEL to keep the data concerned for a longer period.

Apart from the two cases mentioned above, the processing of your data in the event of a complaint is based on SGI-BEL's legitimate interests, which consist in being able to give the best possible response to complaints and prevent them from recurring. This may, in particular, consist of taking appropriate measures towards those within the organisation who have made a mistake, improving internal procedures and, in general, improving its activities and organisation. However, you may object to the processing of your data on this basis if your interests or fundamental rights and freedoms prevail over said legitimate interests of SGI-BEL.

The data used for the purposes mentioned in the previous paragraph are kept for a period of 5 years from the date of the last contact with you.

b) Protecting our rights in court

SGI-BEL may process the data of data subjects when such processing is necessary for the establishment, exercise or defence of a legal right, including administrative justice.

The data processed in this context are kept for the time necessary to bring the dispute to its final conclusion and in compliance with legal obligations, in particular in terms of archiving and accounting, which may prescribe a longer period for all or part of the data retained.

c) Securing and improving your use of https://sgi-bel.org/

The processing of your data in order to secure and improve the https://sgi-bel.org/ site is based on SGI-BEL's legitimate interests, which include being able to best protect its visitors, its association and its image on the Internet. However, you may object to the processing of your data on this basis if your interests or fundamental rights and freedoms prevail over said legitimate interests of SGI-BEL.

This data is kept for a period of 5 years from the last contact with you.

If applicable, please note that the regulations in force may, if necessary, require the processing of your personal navigation data by SGI-BEL, in particular for survey purposes, and for longer periods than that indicated in the second paragraph.

d) Taking into consideration your rights over your personal data

SGI-BEL's legitimate interests require that your personal data be taken into consideration and protected.

This consideration and protection are also legal obligations, based in particular on the GDPR.

This processing, consubstantial with the purposes listed above, ceases at the same time that they do.

e) Complying with applicable legislation, in particular with regard to fraud prevention

SGI-BEL's legitimate interests in ensuring compliance with applicable laws and preventing fraud require the processing of your personal data.

6. With whom do we share your personal data?

SGI-BEL communicates data to third parties only to achieve the purposes indicated in the previous point.

When necessary for these purposes, SGI-BEL may communicate your data to the following third parties:

- Soka Gakkai or Soka Gakkai International in Japan;
- Banking organizations;
- Tax and social administrations;
- Our lawyers in the event of disputes;
- Criminal and judicial authorities;
- The Statutory Auditors.

The sharing of your personal data is always done with the utmost respect for confidentiality and we ensure that our partners comply with the obligations imposed by the GDPR.

7. What are your rights?

a) Your rights in general

You have, under the conditions defined by the applicable regulations and, in particular, the GDPR, the right:

(i) To withdraw your consent at any time for the parts of the processing implemented by SGI-BEL based on said consent;

(ii) To obtain confirmation from SGI-BEL that personal data concerning you are being or are not being processed and, when they are, access to said personal data as well as to various items of information on the processing (purposes of the processing, categories of personal data concerned, recipients or categories of recipients to whom the personal data have been or will be communicated, the expected retention period of the personal data or, when this is not possible, the criteria used to determine this period, etc.);

(iii) To obtain from SGI-BEL, as soon as possible, the rectification of personal data concerning you that are inaccurate;

(iv) To obtain from SGI-BEL the deletion, as soon as possible, of personal data concerning you;

(v) To obtain from SGI-BEL the limitation of processing;

(vi) To receive the personal data concerning you that you have provided to SGI-BEL, in a structured, commonly used and readable format, and the right to transmit this data to another controller without SGI-BEL obstructing it;

(vii) Not to be the subject of a decision based exclusively on automated processing, including profiling, producing legal effects concerning you or significantly affecting you in a similar way.

b) Right to object

You also have:

(i) The right to obtain at any time from SGI-BEL, for reasons relating to your particular situation, that it no longer processes personal data concerning you when such processing is based on its legitimate interests,

(ii) The right to object at any time to the processing of your personal data for information purposes;

c) Exercising of rights

Subject to proof of your identity, you may exercise the rights described above free of charge by writing to SGI-BEL at the email or postal address of SGI-BEL.

In the event of manifestly unfounded or excessive requests, in particular because of their repetitive nature, SGI-BEL may:

- Require payment of a reasonable fee that takes into account the administrative costs incurred in providing the information, sending the communications or taking the requested action; or

- Refuse to act on these requests.

SGI-BEL is responsible for demonstrating the manifestly unfounded or excessive nature of the request.

d) Right to complain to the Data Protection Authority

You can also contact the Data Protection Authority (DPA) if you are not satisfied with SGI-BEL's processing of your personal data.

All information on this subject can be found on the DPA website:

- www.autoriteprotectiondonnees.be/ (FR);
- www.gegevensbeschermingsautoriteit.be/ (NL);
- www.dataprotectionauthority.be (EN);
- www.datenschutzbehorde.be/ (DE).

e) Protection of personal data in the event of death

At any time, as the data subject, you may define, amend and revoke guidelines relating to the retention, erasure and disclosure of your personal data after your death. You have the right to designate a third party to whom your data may be communicated after your death. You then agree to inform this third party of your decision.

To implement this right, you can write to SGI-BEL at SGI-BEL's postal or electronic address.

8. Who hosts your data?

Your personal data is hosted by SGI-BEL, which may in turn use qualified subcontractors with servers located outside and in the territory of the European Economic Area (EEA).

SGI-BEL uses the OVHcloud service. In this context, certain personal data may be processed by OVH as a processor, in accordance with the applicable contractual conditions and current data protection regulations, in particular Regulation (EU) 2016/679 (GDPR).

For more information on how OVH processes personal data in the context of its service, it is recommended to consult OVH's privacy policy, available at the following address: https://www.ovhcloud.com/fr/personal-data-protection/

SGI-BEL uses Google Workspace, provided by Google LLC, to manage its electronic communications. In this context, certain personal data may be processed by Google as a processor, in accordance with the applicable contractual conditions and current data protection regulations, in particular Regulation (EU) 2016/679 (GDPR).

For more information on how Google processes personal data as part of its Google Workspace service, it is recommended to consult Google's privacy policy, available at the following address: https://policies.google.com/privacy

These hosting solutions offer security to guarantee the confidentiality, availability and integrity of data. The chosen provider also agrees, under the same conditions, to carry out or have carried out a backup of your data under conditions that guarantee its security and integrity, and to protect them from any potential server incidents.

If our hosting provider were to exceptionally host data outside the EEA, it agrees to comply with the GDPR regardless of where the data is hosted/stored.

When applicable, our hosting processor also provides appropriate safeguards with regard to the transfer of data outside the EEA, in accordance with Article 46 of the General Data Protection Regulation.

9. Amendment, applicable law and competent jurisdiction

SGI-BEL reserves the right to amend its notice at any time in order to comply with applicable laws. The applicable version of the notice is that which is in force on the SGI-BEL website: https://sgi-bel.org/. We therefore advise you to regularly consult the notice on our site.

The validity, interpretation and/or execution of the notice is subject to Belgian law and applicable European Union law. In the event of a dispute relating to the validity, interpretation or execution of the notice, subject to Article 211, 3°, paragraph 2 of the Law of 30 July 2018 on the protection of individuals with regard to the processing of personal data, the courts and tribunals of the district of Brussels shall have exclusive jurisdiction.

Alternative dispute resolution methods will nevertheless be preferred before any legal proceedings.