

EVENTS AND ACTIVITIES ORGANISED BY THE  
CONFERENCE OF INTERNATIONAL NGOs (CINGO)

PRIVACY NOTICE

## Purpose and scope

The notice explains how the Council of Europe processes personal data of persons (including members, participants, observers, experts and other persons invited punctually) attending events and participating in activities of the Conference of International Non-Governmental Organisations (hereinafter, CINGO) insofar as:

- the data are collected through official contacts in relation to activities and responsibilities of the permanent bodies of the Conference
- the data are collected and processed (stored, used, modified and deleted) with the involvement of the Council of Europe's support staff and structures, and the data therefore falls under the general Council of Europe rules and policies.

Given the autonomous functioning of CINGO's individual bodies, this privacy notice is not applicable to the processing of personal data by CINGO's individual bodies, including the committees, expert councils and the Association "OING Service"<sup>1</sup>, in the context of their activities which do not involve the Council of Europe Secretariat and support structures.

### 1. Who is responsible for data processing?

The Council of Europe is the data controller, which means it has the decision-making power concerning the data processing. Processing of your personal data is governed by the [Council of Europe Regulations on the Protection of Personal Data](#) adopted by the Committee of Ministers on 15 June 2022.

### 2. What data do we process and for what purpose?

We process your personal data for the purposes of administrative and financial management and in order to provide you with the relevant information and administrative support. In particular:

#### a) Election to bodies of CINGO

If you are a candidate to elections in relation to CINGO bodies (in particular for the function of President and vice-Presidents of the Conference, members of the Standing Committee, Chair of the Verification and Dispute Committee), members of the Expert Council on NGO Law and chairs of the thematic committees, you will be expected to provide a CV which may contain some or all of the following categories of personal information: your name and surname, date and place of birth, contact details, gender, nationality, professional background, education and other qualifications, computer and language skills, as well as the information relevant to your motivations and ability to fulfil the function concerned, such as your availability, and any potential private interest that could constitute a conflict of interest or be perceived as such.

#### b) Administration of your participation in CINGO's work

If you are appointed by your organisation as a representative, member or expert to CINGO and its bodies, or are invited to participate in CINGO's work in a different capacity, in order to ensure your admission to and participation in the work and to provide you with the relevant information and administrative support, we may process some or all of the following

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<sup>1</sup> For further information about the Association's own rules, see <https://www.coe.int/en/web/ingo/ingo-service>

categories of data: your name, surname, gender, date and place of birth, nationality, postal address, e-mail address, telephone number(s), post occupied, employer and/or designating institution/organisation, language skills/preferences. This list may be complemented ad hoc with further information, for instance in relation to logistical arrangements for specific events (e.g. special requirements in relation to diet or the accessibility of buildings).

Contact details of heads of delegations (telephone, e-mail address) are in any event included in the publicly accessible [database of INGOs](#) enjoying participatory status in order to facilitate communication with and between CINGO members. The INGOs are responsible for the accuracy of the information contained in the database.

#### c) Entry to the Council of Europe buildings

In order to issue you with a badge for entry to the Council of Europe buildings we process your name and surname and, for certain categories of badges, your date of birth. You will be able to retrieve your badge at the Council of Europe reception upon presentation of your identity document. Your personal data related to the use of the badge are processed in accordance with the rules on processing of personal data of the Council of Europe's entity responsible for safety and security.

#### d) Reimbursement and assistance in relation to travelling and subsistence expenses

If you are entitled to reimbursement of travelling and subsistence expenses from the Council of Europe budget in accordance with CINGO's rules and policies, we may process the following categories of data depending on the nature of the expenses incurred: name and surname, address, bank details, itinerary, copies of the relevant tickets and accommodation vouchers, evidence of the expenditure actually incurred such as invoices and credit card slips or statements, and information on meals or overnight accommodation provided free of charge.

#### e) Visa, travel and accommodation assistance

If you need us to provide you with transport and accommodation assistance, access to public buildings other than the buildings of the Council of Europe, and/or with assistance for the issuing of a visa for travel in order to participate in the events or activities of CINGO, we may also need the details of your identity document.

#### f) Insurance

If, for a given activity or trip, you are covered by a travel insurance taken out by the Council of Europe on your behalf, in the event that you make an insurance claim you will have to provide the following data so that your claim can be processed: your name and surname, phone number, email address, passport details (including date/place of birth, nationality) and your status in relation to the Council of Europe as well as the relevant information concerning the incident. You may also be required to submit supporting documents concerning the incident as well as the invitation letter from the Council of Europe.

#### g) Questionnaires and surveys

We also process personal data, such as name, function, organisation and contact details, that we receive in response to questionnaires we send out and surveys we conduct, in particular in relation to INGOs requests for participatory status at the Council of Europe, the subsequent periodic reviews of compliance with the requirements for participatory status and evaluation of CINGO's activities, the preparation of reports by the Expert Committee on NGO Law, to be able to contact the respondent if there is need for further clarifications. We may also send questionnaires in relation to your participation in CINGO's events and activities, for instance, asking for your suggestions for the agenda or additional information for logistical arrangements.

## h) Photographs and video recordings

Meetings and events organised by CINGO, or in relation to its activities, may lead to photographs and video recordings being made for communication purposes, especially the posting of news on the portals and/or social networks. Persons who do not wish to appear on these photos and video recordings have the possibility to decline by not participating in group photos/video recording or asking the photographer not to include you in the frame, and those who do not wish to appear in video recordings are responsible for avoiding the camera or turning off their screen.

### 3. What is the legal basis for our processing of your data?

We process your personal data on the basis of the Council of Europe's legal instruments and its internal rules in order to carry out activities necessary for the pursuit of the Organisation's and, in particular, CINGO's aims, as set out in the Statute of the Council of Europe and CINGO's statutory texts, in particular [Resolution CM/Res\(2016\)3](#) on the Participatory status for international non-governmental organisations with the Council of Europe and [CINGO's Rules of Procedure](#).

The basis for sharing your name and contact details, including via the [online database of INGOs](#) enjoying participatory status, with other CINGO members, participants and observers is our legitimate interest in ensuring the most efficient work of CINGO and the Council of Europe by facilitating direct and swift communication.

The legal basis for processing data in relation to an insurance claim is the relevant insurance contract mentioned in an official invitation or convocation letter.

The legal basis for taking photographs or recording videos at CINGO's meetings and events is our legitimate interest to promote them.

### 4. Who has access to your data? Do we share your personal data with a third party?

Your personal data are processed by the entity of the Secretariat of the Council of Europe responsible i.a. for managing [the database of INGOs](#) enjoying participatory status and providing general support to CINGO.

The personal data necessary to issue you with a badge for entry to the Council of Europe buildings are processed by the Council of Europe's entity and staff responsible for safety and security.

If you are entitled to reimbursement of travelling and subsistence expenses, your relevant personal data are processed by the central financial services of the Council of Europe in charge of such reimbursements.

Where we need to provide you with travel, accommodation and/or visa assistance, your personal data will be processed by the services of the Council of Europe in charge of organising travel and accommodation and/or Protocol services. We will share the personal data required for the issue of your visa with the competent authorities of the State to which you need to travel for specific official assignments. In order to provide you, if necessary, with transport and accommodation assistance, we will share them with the relevant service providers. We will share only the minimum personal data necessary for the provision of such services.

If you are covered by a travel insurance taken out by the Council of Europe on your behalf and have made an insurance claim, your personal data will first be processed by the services of the Council of Europe in charge of organising travel and then shared with the insurance broker. In case of an accident or illness that requires your hospitalisation, you may contact the insurer directly, where applicable according to the documents you have received (invitation or convocation letter etc.). In this case, the Council of Europe will be notified of the insurance claim made, but the insurer will not be required to provide any medical

information to the Council of Europe. The insurer and the insurance broker will process your personal data in accordance with their own data protection policies.

Your e-mail address and possibly telephone contacts may be shared with other CINGO members / participants. If you do not wish for your data, or particular types of data, to be shared, please contact us by sending an e-mail to [NGO-Unit\[@\]coe.int](mailto:NGO-Unit[@]coe.int).

Your personal data, including the information concerning reimbursement of the travelling and subsistence expenses, may be disclosed to the relevant bodies of the Council of Europe for the sole purposes of internal and external audit.

Your personal information which is stored for archival purposes after the expiry of your mandate may be accessed in accordance with the Council of Europe Records and Archives Policy - see especially [document DGA/DIT\(2018\)1](#) of 23 November 2018.

Photographs taken and videos recorded at meetings and events organised by CINGO may be published on webpages and in social networks managed by the CoE.

Information on persons exercising special responsibilities in CINGO, such as photographs, videos, name and surname, CVs, contact details, may be published on CINGO's website for the term of their mandate, or longer if such information is of historical interest, for instance in relation to past presidents and vice-presidents of CINGO.

Information in the [database of INGOs](#) enjoying participatory status is publicly accessible for the purposes of transparency and facilitating communication with the INGOs.

#### 5. How do we collect and store your personal data?

We process personal data that we receive from your organisation or directly from you or the person you have authorised to transmit such data to us. The data may be provided either by e-mail or, where we put in place an electronic questionnaire, via a secure electronic webpage of the Council of Europe.

We store your information electronically in our Document Management System on servers located within the European Union.

Where we share your personal data for the purpose of providing you with visa, transport and accommodation assistance or access to public buildings other than the buildings of the Council of Europe, or processing your insurance claim, such data may also be stored and shared in the form of electronic files and hard copies. It may be further stored on the servers of external service providers, for instance for booking your tickets or in case of events held outside the Council of Europe.

The Council of Europe information technology services have put in place technical measures to protect the security of your information, including appropriate security measures to prevent your personal information from being used or accessed without proper authorisation; accidentally lost; altered or disclosed. Organisational measures include restricting access to your personal data solely to authorised persons within the Council of Europe Secretariat, who are only able to access your personal data using password protected accounts.

#### 6. How long will your personal data be stored?

We will store your personal data in our system until the expiry of your mandate or until the INGO you represent ceases to be a participating organisation in CINGO. As a general rule:

- since the INGOs are responsible for the content and updating of the information contained in the [database of INGOs](#) enjoying participatory status, they should delete the outdated information from the database;

- any information about you that may be published on a Council of Europe webpage (i.e. on a webpage administered by the Council of Europe as opposed to any webpages created or managed on their own by members and participating organisations) will also be removed upon the expiry of your mandate or when the INGO you represent ceases to be a participating organisation. Certain bodies may keep on their webpages information about their former Presidents and other members even after the expiry of their mandates. Where this is the case, it is open to you to request us to remove your personal information if you believe there is no valid reason for us to keep it published on our website.

After the expiry of your mandate or after the INGO you represent ceases to have participatory status, we may keep some of your personal information for archiving purposes in accordance with the Council of Europe Records and Archives Policy (see DGA/DIT(2018)1) of 23 November 2018 mentioned above). In particular, if you were elected or appointed to specific functions in CINGO bodies, your CV will be stored as part of the working documents of the CINGO for archiving purposes.

The same applies to documents possibly containing information related to your attendance of, or responsibility in meetings and events which – because of their importance for the history and record of activities - will not be redacted or deleted.

Photographs taken and videos recorded at meetings and events organised by CINGO remain published on the Internet for as long as relevant for communication and promotion purposes. We may store photographs and videos internally for archival purposes.

## 7. What are your data protection rights?

You have the right to:

- request access to your personal information held by the Council of Europe;
- request that we correct incomplete or inaccurate personal information that we hold about you;
- request that we delete or remove your personal information when there is no valid reason for us to keep it;
- object to the processing of your personal information on specific grounds relating to your situation.

If you wish to exercise the above rights, or for any queries, concerns, or requests you may have in connection with the way your data is collected and used, please contact the Council of Europe by sending an e-mail to:

- the CINGO secretariat at NGO-Unit[@]coe.int
- the Council of Europe's Data Protection Officer at dpo[@]coe.int.

For any queries specifically related to the processing of your personal data for the purpose of issuing you with a badge for entry to the Council of Europe buildings, please contact the entity of the Secretariat of the Council of Europe responsible for safety and security: accreditation.badges[@]coe.int.

If you feel that the responsible bodies of the Council of Europe have not adequately responded to your request and consider that your data protection rights have been violated as a result of our processing of your personal data, you have the right to lodge a complaint with the Council of Europe Data Protection Commissioner, you may write to: datacommissioner[@]coe.int.