European Fuel Oxygenates Association (EFOA)

**Privacy Policy**

This Privacy Policy sets out how we, the European Fuel Oxygenates Association (EFOA), a Sector Group of Cefic, collect, store and use information about you when you use or interact with our website, [www.petrochemistry.eu](http://www.petrochemistry.eu) (our **website**) and where we otherwise obtain or collect information about you. This Privacy Policy is effective from 25 May 2018.

Petrochemicals Europe processes the personal data transmitted to it in accordance with the legislation in force, and, in particular, Regulation 2016/679 of 27 April 2016 on the protection of individuals with regard to the processing of personal data and the free movement of such data, applicable from 25 May 2018.

Access to the website [www.petrochemistry.eu](http://www.petrochemistry.eu) implies the User’s full and unreserved acceptance of this Privacy Policy, as well as its general terms of use and the cookie policy.

 **Summary**

This section summarises how we obtain, store and use information about you. It is intended to provide a very general overview only. **It is not complete in and of itself and it must be read in conjunction with the corresponding full sections of this Privacy Policy.**

* **Data controller**: The European Fuel Oxygenates Association (EFOA), a Sector Group of Cefic
* **How we collect or obtain information about you**:
	+ when you provide it to us by contacting us via e-mail
	+ from your use of our website, using cookies
* **Information we collect**:
	+ IP address,
	+ information from cookies
	+ information about your computer or device (e.g. device and browser type),
	+ information about how you use our website (e.g. which pages you have viewed,
	+ the time when you view them and what you clicked on
	+ the geographical location from which you accessed our website (based on your IP address)

* **How we use your information**:
	+ for administrative and business purposes
	+ to analyse your use of our website
* **Disclosure of your information to third parties**: only to the extent necessary to
	+ to our service providers with whom we have a data processing agreement in place
	+ to fulfil any contracts we enter into with you,
	+ where required by law or to enforce our legal rights
* **Your rights in relation to your information**
	+ to access your information and to receive information about its use
	+ to have your information corrected and/or completed
	+ to have your information deleted
	+ to restrict the use of your information
	+ to receive your information in a portable format
	+ to object to the use of your information
	+ to withdraw your consent to the use of your information
	+ to complain to a supervisory authority
* **Sensitive personal information**: we do not collect what is commonly referred to as ‘sensitive personal information’. For more information, please see the main section below entitled Sensitive Personal Information.

**Our details**

The data controller in respect of our website is the European Fuel Oxygenates Association (EFOA), a Sector Group of Cefic.

EFOA brings together the European producers of fuel ethers MTBE (methyl-tertiary-butyl-ether), bio-ETBE (Ethyl tert-butyl ether), TAME (Tertiary amyl methyl ether) and TAEE (tertiary-amyl ethyl ether). EFOA is a Sector Group of Cefic, the European Chemical Industry council, representing about 29.000 large, medium and small chemical companies. Cefic is a non-profit organisation.

Cefic is Registered in Belgium with VAT BE 0412 849 915

You can contact the data controller by mailing to

The European Fuel Oxygenates Association (EFOA), a Sector Group of Cefic
Avenue E. Van Nieuwenhuyse 4
B – 1160 Brussels, Belgium

or by calling Tel +32 2 676 72 78

or by sending an email to info@efoa.eu / efoa@efoa.eu

If you have any questions about this Privacy Policy, please contact the data controller at info@efoa.eu / efoa@efoa.eu.

**Information we collect when you visit our website**

We collect and use information from website visitors in accordance with this section and the section entitled Disclosure and additional uses of your information.

**Web server log information**

Our server is located in Belgium. Our website server automatically logs the IP address you use to access our website as well as other information about your visit such as:

* + the pages accessed
	+ information requested
	+ the date and time of the request
	+ the source of your access to our website (e.g. the website or URL (link) which referred you to our website)
	+ your browser version and operating system

Use of website server log information for IT security purposes

We collect and store server logs to ensure network and IT security and so that the server and website remain uncompromised. This includes analysing log files to help identify and prevent unauthorised access to our network, the distribution of malicious code, denial of services attacks and other cyber-attacks, by detecting unusual or suspicious activity.

Unless we are investigating suspicious or potential criminal activity, We do not make, nor do we allow, any attempt to identify you from the information collected via server logs.

Use of website server log information to analyse website use and improve our website

We use the information collected by our website server logs to analyse how our website users interact with our website and its features. For example, we analyse the number of visits and unique visitors we receive, the time and date of the visit, the location of the visit and the operating system and browser used

We use the information gathered from the analysis of this information to improve our website. For example, we use the information gathered to change the information, content and structure of our website and individual pages based according to what users are engaging most with and the duration of time spent on particular pages on our website.

**Cookies**

Cookies are data files, which are sent from a website to a browser to record information about users for various purposes.

We use cookies on our website, including

* essential,
* functional
* analytical

For further information on how we use cookies, please see our cookies policy which is available at: <http://www.efoa.eu/en/cust/documentrequest.aspx?UID=29e23edd-36c8-4f8a-bb6d-36873d88660e>

You can reject some or all of the cookies we use on or via our website by changing your browser settings by using our cookie control tool, but doing so can impair your ability to use our website or some or all of its features. For further information about cookies, including how to change your browser settings, please visit [www.allaboutcookies.org](http://www.allaboutcookies.org) or see our cookies policy.

**Information we collect when you contact us**

We collect and use information from individuals who contact us in accordance with this section and the section entitled Disclosure and additional uses of your information.

**Email**

When you send an email to the email address displayed on our website we collect your email address and any other information you provide in that email (such as your name, telephone number and the information contained in any signature block in your email).

**Post**

If you contact us by post, we will collect any information you provide to us in any postal communications you send us.

**Information we collect when you interact with our website**

We collect and use information from individuals who interact with particular features of our website in accordance with this section and the section entitled Disclosure and additional uses of your information.

**Disclosure and additional uses of your information**

This section sets out the circumstances in which will disclose information about you to third parties and any additional purposes for which we use your information.

**Disclosure of your information to service providers**

We use a number of third parties and who process your information for us on our behalf.

We do not display the identities of our service providers publicly by name for security and competitive reasons. If you would like further information about the identities of our service providers, however, please contact us directly by email and we will provide you with such information where you have a legitimate reason for requesting it.

**Disclosure of your information to other third parties**

We disclose your information to other third parties in specific circumstances, as set out below.

Providing information to third parties such as *Google Inc.*

Google collects information through our use of Google Analytics on our website. Google uses this information, including IP addresses and information from cookies, for a number of purposes, such as improving its Google Analytics service. Information is shared with Google on an aggregated and anonymised basis. To find out more about what information Google collects, how it uses this information and how to control the information sent to Google, please see the following page: <https://www.google.com/policies/privacy/partners/>

You can opt out of Google Analytics by installing the browser plugin here: <https://tools.google.com/dlpage/gaoptout>

Transfer and storage of your information

Information collected by Google Analytics is stored outside the European Economic Area on Google’s servers in the United States of America.

We do not display the identities of our service providers publicly by name for security and competitive reasons. If you would like further information about the identities of our service providers, however, please contact us directly by email and we will provide you with such information where you have a legitimate reason for requesting it.

**Disclosure and use of your information for legal reasons**

Indicating possible criminal acts or threats to public security to a competent authority

If we suspect that criminal or potential criminal conduct has been occurred, we will in certain circumstances need to contact an appropriate authority, such as the police. This could be the case, for instance, if we suspect that we fraud or a cyber crime has been committed or if we receive threats or malicious communications towards us or third parties.

We will generally only need to process your information for this purpose if you were involved or affected by such an incident in some way.

In connection with the enforcement or potential enforcement our legal rights

We will use your information in connection with the enforcement or potential enforcement of our legal rights, including, for example, sharing information with debt collection agencies if you do not pay amounts owed to us when you are contractually obliged to do so. Our legal rights may be contractual (where we have entered into a contract with you) or non-contractual (such as legal rights that we have under copyright law or tort law).

In connection with a legal or potential legal dispute or proceedings

We may need to use your information if we are involved in a dispute with you or a third party for example, either to resolve the dispute or as part of any mediation, arbitration or court resolution or similar process.

For ongoing compliance with laws, regulations and other legal requirements

We will use and process your information in order to comply with legal obligations to which we are subject. For example, we may need to disclose your information pursuant to a court order or subpoena if we receive one.

**How long we retain your information**

This section sets out how long we retain your information. We have set out specific retention periods where possible. Where that has not been possible, we have set out the criteria we use to determine the retention period.

**Retention periods**

Server log information: we retain information on our server logs for 10 years

Correspondence and enquiries: when you make an enquiry or correspond with us for any reason, whether we will retain your information for as long as it takes to respond to and resolve your enquiry, and for 10 years after which point we will delete your information.

**Criteria for determining retention periods**

In any other circumstances, we will retain your information for no longer than necessary, taking into account the following:

* the purpose and use of your information both now and in the future (such as whether it is necessary to continue to store that information in order to continue to perform our obligations under a contract with you or to contact you in the future);
* whether we have any legal obligation to continue to process your information (such as any record-keeping obligations imposed by relevant law or regulation);
* whether we have any legal basis to continue to process your information (such as your consent);
* how valuable your information is (both now and in the future);
* any relevant agreed industry practices on how long information should be retained;
* the levels of risk, cost and liability involved with us continuing to hold the information;
* how hard it is to ensure that the information can be kept up to date and accurate; and
* any relevant surrounding circumstances (such as the nature and status of our relationship with you).

**How we secure your information**

We take appropriate technical and organisational measures to secure your information and to protect it against unauthorised or unlawful use and accidental loss or destruction, including:

* only sharing and providing access to your information to the minimum extent necessary, subject to confidentiality restrictions where appropriate, and on an anonymised basis wherever possible;
* using secure servers to store your information
* verifying the identity of any individual who requests access to information prior to granting them access to information;
* using Secure Sockets Layer (SSL) software

**Transmission of information to us by email**

Transmission of information over the internet is not entirely secure, and if you submit any information to us over the internet (whether by email, via our website or any other means), you do so entirely at your own risk.

We cannot be responsible for any costs, expenses, loss of profits, harm to reputation, damages, liabilities or any other form of loss or damage suffered by you as a result of your decision to transmit information to us by such means.

**Transfers of your information outside the European Economic Area**

All of your information is stored in Belgium.

Other than to comply with any legal obligations to which we are subject (compliance with a court order, for example), we do not intend to transfer your information outside the EEA or to an international organisation. In the unlikely event that we are required to transfer your information outside the EEA (or to an international organisation) for such a purpose, we will ensure appropriate safeguards and protections are in place.

**Google Analytics**

Information collected by Google Analytics (your IP address and actions you take in relation to our website) is transferred outside the EEA and stored on Google’s servers. You can access Google’s privacy policy here: <https://www.google.com/policies/privacy/>

Country of storage: United States of America. This country is not subject to an adequacy decision by the European Commission.

Safeguard(s) used: Google has self-certified its compliance with the EU-U.S. Privacy Shield which is available here: <https://www.privacyshield.gov/welcome>. The EU-U.S. Privacy Shield is an approved certification mechanism under Article 42 of the General Data Protection Regulation, which is permitted under Article 46(2)(f) of the General Data Protection Regulation. You can access the European Commission decision on the adequacy of the EU-U.S. Privacy Shield here: <http://ec.europa.eu/justice/data-protection/international-transfers/adequacy/index_en.htm>

**Your rights in relation to your information**

Subject to certain limitations on certain rights, you have the following rights in relation to your information, which you can exercise by writing to

* **to request access to your information** and information related to our use and processing of your information;
* **to request the correction or deletion** of your information;
* **to request that we restrict our use** of your information;
* **to receive information which you have provided to us in a structured, commonly used and machine-readable format** (e.g. a CSV file) and the right to have that information transferred to another data controller (including a third party data controller);
* **to object to the processing of your information for certain purposes** (for further information, see the section below entitled Your right to object to the processing of your information for certain purposes); and
* **to withdraw your consent to our use of your information** at any time where we rely on your consent to use or process that information. Please note that if you withdraw your consent, this will not affect the lawfulness of our use and processing of your information on the basis of your consent before the point in time when you withdraw your consent.

In accordance with Article 77 of the General Data Protection Regulation, you also have the right to lodge a complaint with a supervisory authority, in particular in the Member State of your habitual residence, place of work or of an alleged infringement of the General Data Protection Regulation.

Verifying your identity where you request access to your information

Where you request access to your information, we are required by law to use all reasonable measures to verify your identity before doing so.

These measures are designed to protect your information and to reduce the risk of identity fraud, identity theft or general unauthorised access to your information.

**Sensitive Personal Information**

‘Sensitive personal information’ is information about an individual that reveals their racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, genetic information, biometric information for the purpose of uniquely identifying an individual, information concerning health or information concerning a natural person’s sex life or sexual orientation.

We do not knowingly or intentionally collect sensitive personal information from individuals, and you must not submit sensitive personal information to us.

If, however, you inadvertently or intentionally transmit sensitive personal information to us, you will be considered to have explicitly consented to us processing that sensitive personal information under Article 9(2)(a) of the General Data Protection Regulation. We will use and process your sensitive personal information for the purposes of deleting it.

**Changes to our Privacy Policy**

We update and amend our Privacy Policy from time to time.

Minor changes to our Privacy Policy

Where we make minor changes to our Privacy Policy, we will update our Privacy Policy with a new effective date stated at the beginning of it. Our processing of your information will be governed by the practices set out in that new version of the Privacy Policy from its effective date onwards.

Major changes to our Privacy Policy or the purposes for which we process your information

Where we make major changes to our Privacy Policy or intend to use your information for a new purpose or a different purpose than the purposes for which we originally collected it, we will notify you by email (where possible) or by posting a notice on our website.

We will provide you with the information about the change in question and the purpose and any other relevant information before we use your information for that new purpose.

Wherever required, we will obtain your prior consent before using your information for a purpose that is different from the purposes for which we originally collected it.