

## EJTA Privacy Notice

### 1. About this Privacy Notice

- 1.1 When you use this Website, either as Factchecker or as Visitor, we collect and process your personal data. This Privacy Notice informs you about our processing activities. It explains which personal data of you that we collect and process, for which purposes we process your personal data and on which legal grounds this is based.
- 1.2 The European Journalism Training Association (“EJTA”, “We”, “Us”) respects your privacy and is committed to protecting the personal information you share with us.
- 1.3 Please note that we use cookies through this Website. Cookies are small text files that are stored on a device’s storage medium and contain certain information and sometimes personal data. For more information on the way we use cookies, we refer to our cookie policy.

### 2. In general

- 2.1 We process your personal data in our capacity as controller. Our registered offices are located at Heidelberglaan 15, 3584 CS Utrecht, Postbus 85029, 3508 AA Utrecht, the Netherlands. You can also find us at Zandpoortvest 60, 2800 Mechelen and you can contact us via e-mail at [info@eufactcheck.eu](mailto:info@eufactcheck.eu).
- 2.2 We reserve the right to from time to time modify, change or amend this Privacy Notice at our own discretion. Such modification, change or amendment will be communicated via the Website.

### 3. Types of personal data we process

- 3.1 When you are a Visitor of the Website, we collect and process:
  - The content of your communication or enquiry and the technical details of the communication itself (such as with whom you correspond at our end, date and time, etc.).
  - The Factchecks you suggest and the comments you leave on Factchecks, as well as your e-mail address when you do so.
  - Technical information relating to the devices that you use, such as the IP-address, browser type, geographical location and operating system.
- 3.2 When you are also a Factchecker, we collect and process
  - Identification and contact information: your name, e-mail address, school.
  - The content of the Factchecks that you post.
  - All other information you wish to provide to us.

3.3 All of the personal data mentioned above, we receive directly from you. It is possible that we receive additional information about your preferences and surfing behaviour from partners such as Google. If you require more information about the personal data these parties process about you and make available to others, we refer you to their respective privacy policies.

#### 4. Purposes for which we collect and use your personal data and the legal grounds on which these purposes are based

The purposes	The legal grounds
<p>We process your personal data to provide you with the Website and to allow you to visit and the Website pursuant to the Website terms and conditions, create a Factchecking account and post Factchecks.</p>	<p>In order to take steps prior to entering into a contract with us, we may base the processing of your personal data on the necessity for the performance of that contract, or in the process of entering into that contract.</p>
<p>We process your personal data to comply with legal obligations or to comply with any reasonable request from competent law enforcement agents or representatives, judicial authorities, governmental agencies or bodies, including competent data protection authorities.</p> <p>Your personal data may be transferred upon our own initiative to the police or the judicial authorities as evidence or if there are justified suspicions of an unlawful act or crime committed by you through your registration with or use of the Website, our social media channels or other communication with us.</p>	<p>This processing activity is necessary to comply with legal obligations imposed on us.</p>
<p>We process your personal data to perform statistical analyses or in the context of surveys so that we may improve our Website or to develop new services. Any services in this regard will be purely of educational purposes and will not be commercialised.</p> <p>We process your personal data to conduct market research and educational development. We may also process your personal data for the preservation of the legitimate interests of us, our partners or a third party if and when your registration with or use of the Services can be considered (a) a violation of the Terms or the intellectual property rights or any other right of a third party, (b) a threat to the security or integrity of the Website, (c) a danger to the</p>	<p>For these purposes, the processing of your personal data is based on our legitimate interests, such as:</p> <ul style="list-style-type: none"> <li>• Continuous improvements of our Website, social media channels, products and services to ensure that you have the best experience possible;</li> <li>• Keeping our Website, social media channels and services safe from misuse and illegal activity;</li> <li>• To defend our legal interests</li> </ul>

Website or any of our or its subcontractors' underlying systems due to viruses, Trojan horses, spyware, malware or any other form of malicious code, or (d) in any way hateful, obscene, discriminating, racist, slanderous, spiteful, hurtful or in some other way inappropriate or illegal.	
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## 5. To whom we send your personal data

- 5.1 We rely on third party processors to provide you our Website and to process your personal data on our behalf. These third party processors are only allowed to process your personal on our behalf upon our explicit written instructions.
- 5.2 We warrant that all third party processors are selected with due care and are obliged to ensure the safety and integrity of your personal data.

## 6. Location and transfer

- 6.1 We process your personal data within the European Economic Area (EEA). However, in order to process your personal data for the purposes outlined in Article 4 above, we may also transfer your personal data to or to third parties who process your personal data on our behalf outside the EEA. Each entity outside the EEA that processes your personal data will be bound to observe adequate safeguards with regard to the processing of your personal data. Such safeguards will be the consequence of:
  - The recipient country having legislation in place which may be considered equivalent to the protection offered within the EEA; or
  - A contractual arrangement between us and that entity, such as an agreement based on the European Commission's Standard Contractual Clauses.
- 6.2 We may transfer anonymized and/or aggregated data to organisations outside the EEA. Should such transfer take place, we will ensure that there are safeguards in place to ensure the safety and integrity of your data and all rights with respect to your personal data you might enjoy under applicable mandatory law.

## 7. Quality assurances

- 7.1 We do our utmost best to process only the personal data which are necessary to achieve the purposes listed under Article 4 of this Privacy Notice.
- 7.2 Your personal data are only processed for as long as needed to achieve the purposes listed under Article 4 of this Privacy Notice or up until such time where you withdraw your consent for processing them. Note that withdrawal of consent may imply that you can no longer use the whole or part of the Website. We will de-identify your personal data when

they are no longer necessary for the purposes outlined in Article 4, unless there is:

- an overriding interest of us, or any other third party, in keeping your personal data identifiable;
- A legal or regulatory obligation or a judicial or administrative order that prevents us from de-identifying them.

7.3 We will take the appropriate technical and organisational measures to keep your personal data safe from unauthorized access or theft as well as accidental loss, tampering or destruction. Access by our personnel or its third party processors will only be on a need-to-know basis and subject to strict confidentiality obligations. You understand, however, that safety and security are best efforts obligations only which can never be guaranteed.

## 8. Your rights

8.1 You have the right to request access to all personal data processed by us pertaining to you. We reserve the right to charge an administrative fee for multiple subsequent requests for access that are clearly submitted for causing nuisance or harm to us. Each request must specify for which processing activity you wish to exercise your right to access and must specify to which data categories you wish to gain access to.

8.2 You have the right to ask that any personal data pertaining to you that are inaccurate, are corrected free of charge. If a request for correction is submitted, such request shall be accompanied of proof of the flawed nature of the data for which correction is asked.

8.3 You have the right to withdraw your earlier given consent for processing your personal data, in which case Article 7.2 will apply.

8.4 You have the right to request that personal data pertaining to you be erased if they are no longer required in light of the purposes outlined in Article 4 or if you withdraw your consent for processing them. However, you need to keep in mind that a request for erasure will be evaluated by us against:

- Overriding interests of us or any other third Party;
- Legal or regulatory obligations or administrative or judicial orders, which may contradict such deletion;
- For the establishment, exercise or defence of legal claims.

Instead of deletion you can also ask that we limit the processing of your personal data if and when (a) you contest the accuracy of that data, (b) the processing is illegitimate or (c) the data are no longer needed for the purposes listed under Article 4 but you need them to defend yourself in judicial proceedings.

8.5 You have the right to oppose the processing of personal data if you are able to proof that there are serious and justified reasons connected with his particular circumstances that warrant such opposition. However, if the intended processing qualifies as direct

marketing, you have the right to oppose such processing free of charge and without justification.

8.6 You have the right to receive from us in a structured, commonly used and machine-readable format all personal data you have provided to us.

8.7 If you wish to submit a request to exercise one or more of the rights listed above, you can send an e-mail to [info@eufactcheck.eu](mailto:info@eufactcheck.eu) or if available, you could use the contact form provided in this Website. Such request should clearly state which right you wish to exercise and the reasons for it if such is required. It should also be dated and signed, and accompanied by a digitally scanned copy of your valid identity card proving your identity. If you use the contact form, we may ask you for your signed confirmation and proof of identity.

We will promptly inform you of having received this request. If the request proves valid, we shall honour it as soon as reasonably possible and at the latest thirty (30) days after having received the request.

8.8 If you have any complaint regarding the processing of your personal data by us, you may always contact us via [\*]. If you remain unsatisfied with our response, you are free to file a complaint with the competent data protection authority.

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