

General Data Protection Policy

1 Introduction

The EAC is a democratic network of heads of national services responsible under law for the management of the archaeological heritage in the Council of Europe member states. The EAC therefore represents the managers of the historic environment and the associated cultural heritage. The EAC is dedicated to the exchange of information between its members about standards and best practice related to heritage management.

The EAC works within a network of associated Agencies, national authorities and public bodies to deliver on its objectives. In order to carry out certain tasks required in the course of the performance of our functions, the EAC needs to process certain personal data.

This *Data Protection Policy* sets out the EAC's commitment to protecting the rights and privacy of individuals and details how we will ensure compliance with the General Data Protection Regulation (GDPR) and data protection legislation. This document specifies the way in which the EAC collects, uses and communicates data. It aims to fulfil four roles:

- Inform users about the collection and use of their personal data.
- Offer users the chance to remove the data collected.
- Offer users access to the data collected or to contest the accuracy of it.
- Reassure users about the security of their data.

All these measures help to ensure that your personal data will not be sold to third parties or used for malicious purposes.

EAC uses your personal data that it collects in order to communicate with you, better understand how its website (including its mobile app) or services are used, and send you information that may be of interest to you (see sections II and III of this policy).

The EAC invites you to read the policy presented below in order to understand how your personal data is used. This document may be subject to modifications, the EAC invites you to consult it regularly.

2 What is the purpose of a Data Protection Policy?

2.1 Scope and Principles

2.1.1 Scope

Personal data means any information relating to an identified or identifiable natural person ('data subject'); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person;

Processing means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

Further examples include processing in relation to appointments to Boards and Working Groups; processing data in order to make or receive payments or carry out audits; processing submissions from public consultations; processing contact details in the course of communicating with a wide range of stakeholders; processing data in the course of EAC business; requests for information or complaints; processing connected to public procurement and contractual agreements with service providers, etc.

This policy applies to all personal data processing activities undertaken by the EAC. This policy should be read in conjunction with other relevant EAC policies and documents. The EAC may supplement or amend this policy by additional policies and guidelines from time to time.

2.1.2 Principles

All processing of personal data must be conducted in accordance with the data protection principles set out in relevant legislation- see section 2.2.

The EAC's policies and procedures are designed to ensure that personal data shall be:

- Processed lawfully, fairly and in a transparent manner in relation to the data subject ('lawfulness, fairness and transparency');
- Collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes; further processing for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes shall, in accordance with Article 89(1) of the Regulation, not be considered to be incompatible with the initial purposes ('purpose limitation');
- Adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed ('data minimisation');
- Accurate and, where necessary, kept up to date; every reasonable step must be taken to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay ('accuracy');
- Kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed; personal data may be stored for longer periods insofar as the personal data will be processed solely for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes in accordance with Article 89(1) of the Regulation, subject to implementation of

the appropriate technical and organisational measures required by the Regulation in order to safeguard the rights and freedoms of the data subject ('storage limitation');

- Processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures ('integrity and confidentiality').

2.2 Legal notice

2.2.1 Regulations concerning privacy

The EAC will process your data in accordance with regulations concerning privacy, in particular the following legal texts:

- The regulation (UE) 2016/679 of the European Parliament and the Council of 27 April 2017 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation, also called "GDPR");
- The Directive 2002/58/EC of the European Parliament and of the Council of 12 July 2002 concerning the processing of personal data and the protection of privacy in the electronic communications sector (Directive on privacy and electronic communications);
- Belgian Act on the protection of natural persons with regard to the processing of personal data:
 - Wet betreffende de bescherming van natuurlijke personen met betrekking tot persoonsgegevens (Kaderwet) / Loi relative à la protection des personnes physiques à l'égard des traitements des données à caractère personnel (Loi Cadre : 30/07/2018)
 - Wet van 3 december 2017 tot oprichting van de Gegevensbeschermingsautoriteit / Loi du 3 décembre 2017 poirtant création de l'Autorité de protection des données.

2.2.2 Changes to the General Data Protection Policy

The EAC reserves itself the right to modify this Data Protection Policy with a view to ensuring compliance with regulations in force concerning privacy or adapting it to its practices. Consequently, it invites you to consult it regularly in order to learn about any modifications. The new version will be available on our website and the date of the update will appear in the last paragraph.

The EAC will not make any modifications that will reduce the level of protection of your rights as guaranteed in this Data Protection Policy, without obtaining your prior consent.

3 Persons with control

Data Protection Officer (DPO): The Data Protection officer will inform the EAC of its obligations arising from the GDPR and other EU or national data protection provisions. He/She will monitor compliance of the EAC with the GDPR, Belgian national and EU data protection provisions and with the EAC's own policies regarding the protection of personal data and provide advice where requested. He/She will handle data subjects' requests and complaints.

The DPO is appointed by the EAC Board: The Secretary of the EAC is the legal person responsible for the use of the User's personal data on behalf of the EAC Board of Directors.

Data Processor (DP): The Data Processor (DP) must keep record of the processing activities and implement the technical and organizational measures to ensure the security of the processing. The DP is appointed by the EAC Board: The EAC Assistant is the Data Processor.

3.1.1 Contact details

The Data Protection officer appointed by virtue of Article 37 of the General Data Protection Regulation, and the Data Processor, can be contacted at the following address:

European Archaeological Council
p/a Urban.brussels
Mont des Arts 10-13
1000 Brussels
info@e-a-c.org

If you would like to receive further information or make a complaint about privacy or security checks, you can contact the EAC via the email address above. In order to proceed as efficiently as possible, please indicate the reason for your request or enquiry.

4 Collection of personal data

4.1 What personal identification data is collected about you?

The type and volume of data that the EAC receives and saves depends on how you use our website and other communication platforms. It is possible for you to access most of our pages without indicating who you are and without revealing personal data.

In some cases, the EAC will ask you to supply these details in order to provide specific services or send you correspondence. The personal identification data that you provide in this manner will not be transmitted to any third parties other than for the purpose of implementing the service requested.

The EAC does not collect personal data unless this data is willingly divulged.

By entering willingly into contact with the EAC, you declare that you agree to the legitimate collection of data, such as: surname and first name of the data subject, e-mail address, phone number, content of the message, time (date and time), the header of e-mails and any physical address mentioned, as well as any other personal data you have supplied.

Data that you communicated willingly to it comes for example from registering for one of its services (newsletter, etc.).

It concerns, among others, the following data according to the purpose to be fulfilled:

- surname and first name,
- pseudonym,
- email address,
- date of birth,

- your city, country and postcode of residence,
- the dates of your participation as well as the answers provided in the frame of our activities.

4.2 Who collects your data?

When you are on the EAC website or on any other communication platform that is dependent on it, and you are asked to, or choose to, provide personal data, you communicate this data to the EAC, and to it alone, unless otherwise specified.

4.3 What to do in the event of identity theft, data theft or computer piracy

The EAC has taken all possible and relevant legal and technical measures to prevent unauthorised access and use of your data. Consequently, it declines all responsibility in the event of identity theft, data theft or computer crime. In the event that its computer systems are hacked, the EAC will immediately take all possible measures to limit damage and/or theft and it will inform you about the data concerned and the extent to which they have been affected.

In the case of identity theft, data theft or computer crime, the EAC invites you to file a complaint with the mediation department as well as with the competent authorities. Once the complaint has been received, and unless otherwise instructed, the EAC will store the data in question for a period of two years.

4.4 How does the EAC use your data?

The EAC does not distribute, rent or sell data about the user to anyone. It uses personal data about yourself to better understand the people who visit its websites (including social media, blogs, forums, etc.), apps and other technological and communication systems. It also uses your data to be able to send you information to which you have subscribed or which it feels may be of interest to you.

4.4.1 The end goals of using your data

The EAC uses your data only for specified, explicit and legitimate goals designed to:

- Allow the organisation of the activities in which you are participating.
- Manage the relationship of the EAC with you, manage advertising for its services or those of the EAC's partners, even those of third parties: for example, collecting and using your data to send you its newsletters and other data which may be of interest to you.
- Improve its content on the basis of data about who consults it and how its content is consulted.
- Evaluate the effectiveness and conviviality of the EAC's website and other technological systems, as well as their improvement for the benefit of our web users and other users.
- Carry out internal statistical surveys: for example, in order to evaluate your interests and better define the development of its activities and its communication strategies.

4.5 Data storage period

The EAC only stores your data for a period that does not exceed that required with regard to the final goals for which it is used in agreement with legal requirements.

4.6 Communication of your data

The EAC may communicate your data to its partners in order to achieve exactly the same purposes as those developed above, provided that data sharing is fair and lawful, in order to fulfil a specified, explicit and legitimate purpose.

Your data may be transmitted to third parties acting on behalf of the EAC or for it, with a view to the data being used in line with the purposes for which it has been collected. The EAC ensures that its own sub-contractors guarantee an adequate level of protection, namely that it demands a contractual guarantee from its sub-contractors that it will use your data solely with the authorised purpose in mind, and with discretion and the required security.

4.7 Rights of Individuals whose data is collected

The EAC implements appropriate policies and procedures to ensure that data subjects can exercise their rights as follows:

- Right of access: The EAC implements procedures to ensure that requests from data subjects for access to their personal data will be identified and fulfilled in accordance with relevant legislation.
- Right to rectification: The EAC is committed to holding accurate data about data subjects and will continue to implement processes and procedures to ensure that data subjects can rectify their data where inaccuracies have been identified.
- Right to erasure (right to be forgotten): Data subjects have a right to request the erasure of their personal data in specific circumstances. Where such an objection is received, the EAC will assess each case on its merits.
- Right to restriction of processing: The EAC implements and maintains appropriate procedures to assess whether a data subject's request to restrict the processing of their data can be implemented. Where the request for restriction of processing is carried out, the EAC will write to the data subject to confirm the restriction has been implemented and when the restriction is lifted.
- Right to data portability: Where the EAC has collected personal data on data subjects by consent or by contract then the data subjects have a right to receive the data in electronic format to give to another data controller. It is expected that this right will apply only to a small number of data subjects.
- Right to object: Data subjects have a right to object to the processing of their personal data in specific circumstances. Where such an objection is received, the EAC will assess each case on its merits.
- Right not to be subject to automated decision making: Data subjects have the right not to be subject to a decision based solely on automated processing, where such decisions would have a legal or significant effect concerning him or her. Data subjects will be informed when elements of processing include automated decision making or profiling.
- Right to complain: The EAC implements and maintains a complaints process whereby data subjects can contact the Data Protection Officer. The Data Protection Officer's role includes working with the data subject to bring complaints to a satisfactory conclusion for both

parties. Data subjects are also informed of their right to bring their complaint to the Data Protection Commission.

In accordance with regulations concerning privacy, at any time, you have the right to exercise your right of access, rectification, opposition, limitation, deletion and portability. To that end, please contact the Data Processor [EAC Assistant].

In the case that you no longer want to receive information (newsletters, etc.) from the EAC, its partners or third party companies, you may, at any time, inform it of this by contacting the Data Processor or by clicking on the unsubscribe link provided.

4.8 Security and confidentiality of your data

Access to your data is limited to the EAC Board members and the EAC Assistant, who comply with strict privacy standards when processing your data.

To guarantee the security and confidentiality of your data, the EAC only works with sub-contractors which are also required to comply with it. Despite the resources implemented in order to create a reliable website worthy of confidence, the EAC recognises that the Internet is not a completely safe environment. Consequently, the EAC does not assume any responsibility for or does not guarantee the security of your data during its transit over the Internet.

4.9 Transfer of your data outside of the European Economic Area

The EAC does not transfer the personal data of its data subjects outside of the European Economic Area unless an adequate level of protection is ensured. Data subjects will be informed where transfers to a third country are in place.

The EAC guarantees that it shall refrain from carrying out the processing or storage of data in countries that cannot offer the same guarantees, except if:

- the person in question has given his explicit agreement;
- the transfer is necessary to implement the contract (between the User and the EAC);
- the transfer is necessary for the end or execution of a contract concluded or to be concluded between the party responsible for processing and a third party in the interests of the User;
- the transfer is necessary or is a legal obligation (important public interest or right);
- the transfer takes place from a public register intended to inform the public.

4.10 Sending advertising by email and any other communication method

The EAC will share with you its newsletters and any other information likely to be of interest to you by email and/or by any other communication method (Facebook, Twitter, forums, etc.).

At any time you have the right to oppose the use of your personal data to receive advertising from the EAC, its administrators, partners or third party companies.

In order to oppose the sending of any further communications, just choose one of the following options:

- click on the unsubscribe link included in the advertisement email;
- contact the Data Processor [EAC Assistant].

4.11 Hypertext links to other websites

The website of the EAC and its services may contain hypertext links to other websites which are not operated or controlled by the EAC. Consequently, the EAC may not be held responsible for the content of such websites, or any protection practices of third parties that operate them and which may differ from our own.

5 Cookie policy

In order to facilitate the use of its website and make it more pleasant, the EAC uses cookies. These allow its sites to memorise your actions and preferences (username, language, size of characters and other display settings) for a given period of time so that you do not have to communicate this information again each time you consult these sites or browse from one page to another.

5.1 What is a cookie?

A cookie is a small text file, which may be encoded, that is stored by a website on your computer or any other technological system (smartphone, tablet, etc.) that you use to consult it. These cookies are designed to speed up and personalise how you use the EAC site when you visit it and return to it.

To that end, cookies communicate data between your web browser (Chrome, Firefox, Internet Explorer, Safari, etc.) and the server that hosts your website. For example, cookies communicate about your site display preferences (language, size of characters, etc.), your browsing history, your choices from among the options proposed by a site, or by saving data.

Cookies allow the EAC, for example, to compare new visitors with old ones, understand how users browse its site, count the visitors to the site and obtain information which it will use to improve the browsing experience in the future.

Cookies do not keep any trace of personal data about a user and identifiable data will never be saved. If you do not want to use cookies, you must configure your computer's settings in order to delete all of the website's cookies and/or receive a notification if cookies are saved.

If you do not want to modify the cookies settings, you can simply continue visiting the site.

5.2 Types of cookies we use

Type of cookie	Compulsory/ optional	Name of cookie/ storage period	Purpose of cookie
Cookies strictly necessary for browsing	Compulsory		
Analytical and performance cookies	Compulsory	Google Analytics. These cookies are anonymous and their lifespan may be as much as 2 years.	For example, know the number of visitors, their geographic location, their path on the site (how and via which page they accessed it, the pages that followed their session and the page via which they left the site), the time of the visit, etc.
Functional cookies	Optional		

5.2.1 Cookies strictly necessary for browsing

These cookies are essential for browsing the site and taking advantage of its features. They cannot be deactivated in our systems. They are stored on your terminal in response to your actions, which are equivalent to a request for services, such as defining your privacy preferences, logging in (accessing secure areas on the site) or completing forms.

- Therefore, they allow:
- browsing between the website's sections;
- completing of forms;
- safe checks of your identity before allowing access to your personal data when a personal account has been created, including browsing between the site's secure zones which require authentication.

You can configure your Internet browser to block cookies or notify you about the existence of cookies. If you refuse these cookies at a later date, certain sections of the website or certain of the services proposed may not work as they should or may not even work at all.

5.2.2 Analytical and performance cookies

These cookies collect data about the way in which visitors use a website and, in particular, the number and behaviour of users on the sites.

These cookies allow the EAC in particular to draw up statistics. For example, by counting visits and the traffic sources so that the EAC is able to assess and improve the performance of its websites and its services. They help to know which pages are the most and least popular, see how visitors browse the sites and how its services are used.

These cookies also help to verify its performance in the sense that they also indicate if error messages are sent, how often and on the basis of which actions.

Cookies do not collect data that allow visitors to be identified. To the extent that all the data collected by these cookies are brought together, they remain anonymous. These cookies are designed solely to improve the functioning of websites.

The data collected by the cookies is aggregated. The consequence of this is that if you delete these cookies, the EAC will ignore when you visited our site or used its services and it will not be able to monitor its performance.

By using a EAC website, you agree to receive this type of cookie on your technological system.

5.2.3 Functional cookies

Functional cookies, also called "functionality cookies", provide improved and customised functions. Indeed, they facilitate and analyse the functioning of websites in order to make them more pleasant to use and more personal by allowing the site to memorise the choices that you made and providing you with more precise and personal features.

In particular, they help to:

- personalise the services by memorising your preferences (choice of a language, currency, region, where you are, etc.);
- collect data communicated in online forms;
- provides services that you have requested;
- draw up statistics (for example, the number of single visitors);
- analyse use of the site and the popularity of our pages (cfr also analytical and performance cookies)

These cookies are specific to the content management platform (for example, WordPress, Drupal, Liferay, Craft CMS), which can be described as the "motor" of a site.

The information collected by these cookies is rendered anonymous and cannot track your browsing activity on other websites. With the exception of the cookie defining your linguistic preference, functional cookies expire when closing your browser. Therefore, they are deleted from your computer or any other technological system when you quit the program.

By using a EAC website, you agree to receive this type of cookie on your system. If you block these cookies, all or some of these services may not work properly.

5.2.4 Cookies issued on our sites by third parties (integrated into our sites or our services)

Cookies issued by third parties may be installed in third party apps integrated into the websites of the EAC or its services, in advertising content (graphics, animations, videos, etc.) distributed via advertising spaces integrated into the websites of the EAC or its services. In particular, this is the case of the buttons "Share", "Like" from social media such as "Facebook" "Twitter", "LinkedIn" etc.

The social media supplying such an application button may identify you with this button, even if you have not used this button when consulting a website of the EAC or its services. Indeed, this type of application button may allow the social media concerned to monitor your browsing on a website of the EAC or its services, due to the sole fact that your social media account concerned was activated on your technological system (open session) during your browsing on a website of the EAC or its services.

The issue and use of cookies by third parties is subject to the privacy protection policies of these third parties. Thus, the EAC has no control over the process used by the social media to collect data concerning your browsing on its websites or on its services associated with the personal data which they have at their disposal. The EAC invites you to consult the privacy protection policies of these social media in order to understand the objectives of their use of browsing data, in particular advertising, which they may collect with these application buttons. These protection policies should, in particular, allow you to choose from these social networks, especially by configuring your user accounts for each of these networks.

The EAC reminds you that, at any time, simply and free of charge, you can choose to refuse the saving of cookies on your technological system in such a way that neither the EAC nor its partners have data collected by cookies.

6 Review of this policy

Creation of GDPR policy in this form: 27 October 2022.

Last review: 15 October 2025

Next review: October 2028