



FCI Privacy Policy

The international non-profit-making association known as **Fédération Cynologique Internationale AISBL** (hereinafter, "FCI" or "we"), through its various activities, is collecting, processing and managing some personal information and data about you.

The aim of this privacy policy is to provide you with transparent and clear information about how and why we use your personal data. The concept of personal data is broad and encompasses any type of information related to you, as a directly or indirectly identifiable natural person.

We recommend that you read this privacy policy carefully in order to better understand our practices regarding the processing of your data. The protection of your data and privacy is of utmost importance for us at FCI. We comply with data protection laws, including the European Regulation 2016/679 of 27 April 2016 on the protection of personal data (the "GDPR") and any other applicable national act or regulation regarding the processing of personal data or the protection of privacy.

This data protection policy was last updated on **29/09/2020**. Please check our website regularly to stay informed of updates to this data protection policy: www.fci.be.

1. FCI's role as a data controller

The data controller responsible for the processing of your data is Fédération Cynologique Internationale AISBL having its registered offices at Place Albert 1^{er}, 13, 6530 Thuin, Belgium.

As a data controller we autonomously determine the purposes and means of the processing of your personal data. Note, however, **that NCOs¹** and other organisations related to us, may also collect and process personal data, for their own purposes and under their own responsibility.

2. What data does FCI collect?

We collect and process your personal data only for the purposes set out in this Policy.

In general, FCI is an international not-for-profit-making organisation in the field of pedigree dogs (cynology). The FCI, also known as the World Canine Organization, is the umbrella federation for a global partnership of a large number of NCOs.

FCI is devoted to (i) encouraging and promoting the breeding, registration and use of pedigree dogs ensuring that their functional health and physical features meet the standard set for each respective breed, enabling them to work and to carry out different functions in accordance with the specific characteristics of their breed; (ii) protecting the use, the keeping and the breeding of pedigree dogs; supporting the non-profit exchange of dogs and of information on cynology and initiating the organisation of shows, tests, trials, conferences, sport and educational events, the use of dogs in rescue operations and for other special purposes such as therapy, assistance and other dog related activities; and (iii) promoting and supporting dogdom and dog welfare worldwide.

Together with its network of members and partners, it provides for a global cynological network bringing together NCOs, dog owners, breeders, judges and dog enthusiasts from all over the world.

It is in this framework of its general purpose and activities that FCI may process certain personal data.

Below you will find an overview of:

- the categories of personal data that we, or third-party **Data processors**² acting on our behalf, may collect, use and store about you;
- the purposes for which this information would be collected;
- the legal basis for processing your personal data.

During its day-to-day activities, FCI may process the following personal data about you as:

Natural person linked to an FCI Member, Contract or Cooperating Partner³	NCO Judge	FCI event participant, breeder (with an FCI kennel name)	Processor (contact person) (Suppliers; Consultants; Contractors; etc.)
First name, last name	First name, last name, middle name	First name, last name	First name, last name
Address, incl. country	Address, incl. country	Address, incl. country	Address, incl. country
E-mail address(es)	E-mail address(es)	E-mail address(es)	E-mail address(es)
Phone and mobile phone numbers	Phone and mobile phone numbers, fax number	Phone and mobile phone numbers	Phone and mobile phone numbers
Titles (Mr, Ms, Miss), name of employer (NCO ¹ in charge) and professional title	Titles (Mr, Ms, Miss) judge identification number and status as an NCO judge (active, inactive, suspended, excluded)	Titles (Mr, Ms, Miss), owner/co-owner of an FCI kennel name	
Travel details			
Financial information: e.g. bank details			Financial information: e.g. bank details

Academic record or qualification/skills; biographical info	Academic record or qualification/skills; biographical info (birth date, photograph, languages spoken, curriculum vitae, FCI kennel name)		
Gender	Gender	Gender	Gender
Communications: e.g. e-mails	Communications: e.g. e-mails	Communications: e.g. e-mails	Communications: e.g. e-mails
Website usage data	Website usage data	Website usage data	
		Dog and related information such as Name, Breed, Sex, Pedigree, etc.	
Social media details	Social media details	Social media details	Social media details

Please note that during certain events, shows or competitions, photographs, audio and video recording may occur. These photographs, recordings and livestreams may be published and broadcasted on FCI media. You will be duly informed of your rights by the responsible organiser of such events or by the service provider (photographs, livestreaming, videos), FCI does not bear any responsibility in this respect.

3. How and why we may store and use your information

We (or third-party data processors acting on our behalf) may collect, store and use personal information listed above for the following purposes:

- to manage FCI's (existing, future or potential) relationship with you and to ensure an effective relationship between FCI and you;
- to perform services, obligations or enforcing rights in relation to the contractual or business relationship between FCI and you;
- to send personalized commercial communications subject to your consent;
- to draft and publish FCI's annual report;
- to guarantee the security of persons or property;
- to perform obligations, enforce or defend rights or interests in relation to the contractual or business relationship between FCI and a third party;
- to perform any legal obligation, including abiding by or enforcing an order from a court or from a governmental body or authority.

Please note that FCI processes personal data on a need-to-know or need-to-access basis, limiting access to **FCI website portal users**⁴. Where appropriate – given the nature of the personal data concerned – certain information can be made accessible to the public (see below under Section 5.1 for more information).

4. On which legal basis do we process your data?

We always process your personal data on the basis of and within the boundaries of the legal bases as those are laid down under applicable law. We also ensure to limit the processing of your personal data to what is strictly necessary for the achievement and performance of these purposes.

4.1. Your consent

When we process your personal data, beyond the usual interactions, we strive to rely on your consent, to put you in control of your personal data. Subject to obtaining your prior and specific consent and in accordance with the applicable law, we may process your personal data, such as e-mail address, for instance in order to send you personalised information, newsletters or various publications to which you subscribe. You always have the right to withdraw your consent at any time.

4.2. Performance of our Legal obligation

We may also process your personal data where this is necessary for the performance of our legal duties towards you. In such a case, we limit the processing of your personal data to the extent of what is strictly necessary.

If a natural person (nominated by his/her NCO) is eligible for a position in an FCI body, the association may process his/her personal data for the functioning of its bodies, such as board members administration, commissions members administration, management, voting procedures and related, following from the statutes and Books II and X of the Belgian Companies and Associations Code.

4.3. Performance of our Contractual obligation

We process personal data for the performance of your contractual relationship with FCI. This information can help FCI with the administration and management to perform its tasks, services and activities or allow for communications. In particular, this information is needed for and facilitates the general administration and registration of you as delegate of an FCI member or partner, a judge, an FCI event participant, a breeder (with an FCI kennel name) or a processor.

We may also process your personal data as an individual allowed to access the FCI website.

We also process personal data for the purpose of following-up your and your dog's participation to FCI approved events. This data is provided directly by you when participating or registering for an event. We limit the processing of Event Participants' personal data to what is strictly necessary for the achievement and performance of this purpose.

In addition, since a NCO (show/working/sports) judge expects to be invited to officiate, it is also necessary for the organisers of the events to be properly informed (contact and identification data) prior to entering into a contract with the judge.

4.4. Legitimate interests of FCI

When not strictly necessary for any of the above-mentioned reasons, FCI may also process your personal data for other purposes, falling under the achievement and the realisation of its legitimate interests. In such a case, however, FCI maintains a fair balance between the need to process your data and the preservation of your rights and freedoms, including the protection of your privacy. Whenever this is the case, FCI will keep you informed about what type of legitimate interest we are pursuing and provide you with transparent information about the processing operations and your rights.

These are typical examples of why we need to process your data for our legitimate interests:

- to organize shows, tests, trials, conferences, sport educational events, or any other dog related activities;
- to manage FCI's public relations;
- to accurately publish results, standings, rankings, awards or certificates obtained by your dogs at the different FCI competitions (shows, working and sports contests);
- to accurately keep record and inform event organisers about your qualifications as a NCO judge;
- to keep record of breeding, registration and use of pedigree dogs;
- to draft and publish FCI's catalogues;
- to manage the communication with the members/delegates of **FCI bodies**⁵ appointed by the FCI members and contract partners or **FCI Sections**⁶;
- for direct marketing purposes;
- to publish newsletters, information related to the organisation and website stories through various FCI media to the general public;
- to manage the communication and updates with FCI members and contract partners (news, updates, activities);
- to contact policymakers, stakeholders and journalists on legislative issues, and communicate the position of FCI on policy issues;

5. With whom and how do we share your data?

Your personal data will never be shared with third parties without your express prior consent. The only exceptions to this apply in the following cases:

5.1. FCI website⁷ and FCI website portal⁸

FCI processes personal data on a need-to-know or need-to-access basis, limiting access to FCI website portal users. FCI website portal users are provided with an account to the FCI website portal. When any of them log in to the portal, access to content, items and data are controlled by the membership rules as defined by the organisation. FCI website portal users are subject to confidentiality obligations.

Where appropriate – given the nature of the personal data concerned (e.g. results, rankings, standings, contact information and qualifications of NCO judges, etc.) – certain information can be made available on the FCI website. Any visitor to the FCI website can access such personal data to consult them (but not download them).

5.2. For prosecution reasons

Where required in order to investigate the unlawful use of our services or for the purposes of prosecution, personal data will be disclosed to the relevant law enforcement authorities and, where applicable, to any third-party claimants. However, such a course of action will only take place if there is concrete evidence of unlawful conduct or misuse. In such cases, your data may also be shared if doing so is required for the fulfilment of terms and conditions of use or other agreements. If requested, we are also legally obligated to disclose such data to certain public authorities, such as law enforcement bodies, authorities that penalise offences with financial penalties, and financial authorities.

In these cases, data is disclosed on the basis of our legitimate interest in combatting misuse, aiding the prosecution of criminal offences, and aiding the establishment, assertion and enforcement of claims, in line with point (f) of Article 6(1) of the GDPR. If you require further information about the balancing of interests that must be carried out in accordance with point (f) of Article 6(1) of the GDPR, please contact us using the details provided below.

5.3. Processors

We rely on processors in order to provide our services. In such cases, personal data will be shared with these processors in order to allow them to continue providing their services. The processors have been carefully selected by us and can be subject to regular audits. They are permitted to use the data only for the purposes specified by us. Furthermore, they are contractually obligated to handle your data exclusively in accordance with this privacy policy and in line with the applicable data protection laws.

More specifically, we use the services of the following processors in particular:

- providers for events, shows, competitions, conferences, meetings and other types of dog related activities;
- service providers for the distribution of newsletters or the execution of surveys;
- service providers for study research, statistics, scientific studies, etc.;
- logistics service providers, for the purpose of sending you materials relating to the organisation's activities;
- payment service providers for the purpose of processing all payments from you to us or vice versa;
- IT service providers for the provision of hardware and software, for the implementation of maintenance work and for the use of software as a service applications or tools.

Data is disclosed to processors on the basis of Article 28(1) of the GDPR or, alternatively, on the basis of our legitimate interests in the economic and technical advantages associated with the use of specialised processors and on the basis of circumstances in which your rights and interests in the protection of your personal data are not overridden (see point (f) of Article 6(1) of the GDPR). If you require further information about the balancing of interests that must be carried out in accordance with point (f) of Article 6(1) of the GDPR, please contact us using the details provided above.

5.4. FCI members, Contract and Cooperating Partners

FCI members, Contract and Cooperating Partners may also have access to your personal data in the context of the functioning of FCI and FCI bodies in accordance with article 8.

6. What are your rights?

6.1. Access, rectification, erasure, portability and objection rights

For all the purposes defined above, and subject to applicable data protection laws, you have the following rights:

- the right to ask us to provide you with copies of personal data that we hold about you at any time, which include the right to ask us: whether we process your personal data, for what purposes; the categories of data; the recipients to whom the data are shared;
- the right to ask us to update and correct any out-of-date or incorrect personal data that we hold about you;
- the right to withdraw your consent where such consent has been given;
- the right to erasure within the limits afforded by data protection legislation;
- the right to oppose to the processing of your personal data, within the limits afforded by data protection legislation;
- the right to data portability within the limits afforded by data protection legislation.

6.2. How to exercise those rights?

You may at any time exercise the above-mentioned rights in accordance with data protection regulations, by sending a request with a copy of your ID card (passport or other proof of identity) to info@fci.be or in writing to Place Albert 1^{er}, 13, 6530 Thuin, Belgium, and subject to complying with our reasonable requests to verify your identity.

6.3. Right to lodge a complaint

You can also lodge a complaint to the Belgian Data Protection Authority either by post at Rue de la Presse 35, 1000 Brussels, or by e-mail at contact@apd-gba.be or by phone at +32 2 274 48 00 or first-line assistance at +32 2 274 48 78.

7. How long do we keep your personal data?

We will not store your personal data beyond the time necessary for the performance of the purposes for which the data is processed, unless their retention would continue to be required for other fundamental purposes, including, but not limited to, complying with our legal obligations, handling legal claims and resolving disputes.

The retention period can therefore differ per purpose and can sometimes be very short. Sometimes the period can also be longer, for example to comply with our legal obligations (in order to comply with our accounting and tax obligations, for example, we are obliged to keep your billing details for a maximum of 7 years) or in view of our legitimate business interests, show and other events catalogues, rankings and listings are kept for 15 years, the average life time of a dog.

After expiry of the applicable retention period(s), personal data will be deleted or made anonymous.

8. International transfers

When we transfer personal data that we collect from you to processors, FCI members or contract/cooperating partners in countries outside the European Economic Area that may not provide an adequate level of protection, we will ensure that appropriate tools are used for such data transfer, such as entering into the European Commission's standard contract clauses.

In addition, we developed a set of "Best practices" designed to help FCI members and contract/cooperating partners comply with data protection principles when they collect and process personal data in the context of the activities of FCI.

9. How do we protect your personal data?

We take appropriate technical and organisational measures to safeguard and protect your personal data, against unauthorised or unlawful processing and against accidental destruction, loss, access, misuses, damage and any other unlawful forms of processing of the personal data in our possession.

10. How to contact us?

If you have any questions or comments about this privacy policy, if you would like to exercise your rights, or to update the information we have about you or your preferences, please contact us via: info@fci.be or in writing to Place Albert 1^{er}, 13, 6530 Thuin, Belgium.

11. Glossary

NCO¹ means National Canine Organisation, Member or Contract Partner of the FCI.

Data Processors² means contractually bound third-party organisations and service providers which process personal data on behalf of FCI.

Natural person linked to an FCI Member, Contract or Cooperating Partner³ means contact person representative or staff member of FCI Members, Contract and Cooperating Partners, member/delegate of FCI bodies⁵ appointed by the FCI Members and Contract Partners or by a FCI Section or any delegate appointed by a FCI Cooperating Partner and invited to take part in a meeting of a FCI body.

FCI website portal users⁴ means FCI & NCOs staff and members/delegates of FCI bodies⁵ specifically authorised to access the FCI website portal.

FCI bodies⁵ means FCI General Assembly, General Committee, Executive Committee, President, Executive Director and other bodies: honorary members & Presidents, mandatory & non mandatory Commissions, groups of experts - e.g. hip and elbow dysplasia experts and Financial Commission.

FCI Section⁶ means geographical subdivision of the FCI

FCI website⁷ means FCI website available for the public (<http://www.fci.be/en/>)

FCI website portal⁸ means FCI portal available on FCI website (with username and password) (<http://www.fci.be/en/login.aspx?back=%2ffr%2fnco%2f>) to FCI & NCO Staff and members/delegates of FCI bodies