

BUND e.V. Bundesverband

Information about data processing in compliance with the EU General Data Protection Regulation (GDPR)

Valid: February 2019

In the following information, Bund für Umwelt und Naturschutz Deutschland e. V. (BUND) Bundesverband (hereafter: “BUND”) provides an overview of how personal data is processed in compliance with the GDPR.

1. Controller and contact details of the data protection officer

The controller for the processing of your personal data is:

Bund für Umwelt und Naturschutz Deutschland e. V. (BUND)
Kaiserin-Augusta-Allee 5
10553 Berlin
Germany
Tel.: +49(0) 30 275 86-40
Fax: +49(0) 30 275 86-440
bund@bund.net

You can also contact the data protection officer at the above-stated address and at the email address datenschutz@bund.net. Should you require confidentiality, please contact our data protection officer by regular mail.

2. Categories of personal data

Which categories of personal data are processed by BUND depends to a large extent on the reasons for and scope of the contact with you. A distinction must be made between members, donors and interested parties. In the contexts of membership, donations, participation events, inquiries or other agreements, BUND, depending on the relationship, normally processes the following categories of data:

- Name, first name, address, contact details (telephone number and email address), date of birth, place of birth, marital status, industry/profession; additional data about relatives, e.g., for family memberships, and member and donor IDs;
- Corporate name, if applicable, also consisting of the name, first name, address, contact details (telephone number and email address), industry, company contact person, including their name, first name, function and contact details (telephone number and email address);
- Legitimation data (e.g., ID data), authentication data (e.g., sample signature), tax ID;

- Payment transaction and order data (e.g., bank/credit card details or payment transactions), credit score (payment behavior towards business partners);
- Member and donor histories or interested party history in the context of legacies.

If contact is established with you directly during your membership or in the course of donor or interested party support during participation events, further data, e.g., information about the contact channel, date, occasion, results and copies of written correspondence will be processed.

3. Data processing purposes and legal bases

BUND will process your above-stated personal data and categories of personal data for the performance of the respective contract (e.g., membership, donation or participation event) or pre-contractual measures (e.g., contact inquiries or requests for information) with you under Art. 6(1) Letter b GDPR. Your contact data will also be used for these purposes, e.g., for specific information or follow-up questions.

In addition, BUND is subject to various legal requirements (e.g., the German Money Laundering Act [Geldwäschegesetz, GwG] and tax laws) and will also process your data on the basis of legal requirements under Art. 6(1) Letter c GDPR or for tasks carried out in the public interest under Art. 6(1) Letter e GDPR. Processing purposes include, among other things:

- Application and evidence obligations in the context of grants from public bodies;
- Fraud and money laundering prevention;
- Compliance with monitoring and reporting obligations and audit requirements under tax law;
- Compliance with official and court orders and directives;
- Assessment and management of risks by BUND.

If necessary, BUND will process your data as part of a weighing of interests under Art. 6(1) Letter f GDPR to safeguard the legitimate interests of BUND or of third parties. For example:

- Measures for association management and the further development of statutory tasks;
- Exercise of legal claims and defense in the event of legal disputes;
- Safeguarding BUND's IT security and IT operations;
- Preventing crime.

BUND may also process your data as part of a weighing of interests under Art. 6(1) Letter f GDPR, e.g., on the basis of your membership, donor relationship, participation events, existing agreements or inquiries for needs-based information according to your interests as part of BUND's statutory purposes (self-advertising), subject to the following conditions:

- Postal marketing, insofar as you did not object to this processing; you may object (see Section 7) to the use for such marketing purposes at any time for the future by contacting us using our contact details (see Section 1);
- Telephonic marketing to companies with your presumed consent, insofar as you did not object to this processing; you may object (see Section 7) to the use for such marketing purposes at any time for the future by contacting us using our contact details (see Section 1).

BUND will not transfer your data to third parties for marketing purposes.

If you consented to the processing of your personal data for certain purposes, processing for such purposes will be lawful under Art. 6(1) Letter a GDPR. Consent may be withdrawn at any time for the

future by contacting us using our contact details (see Section 1). Consent may, among other things, be granted for:

- The sending of the BUND newsletter, oriented to your interests (e.g., for information inquiries), to your email address;
- Using the occasion/contents of a participation in a campaign for the interest-based organization of the newsletter's contents which, depending on the campaign, may represent special categories of personal data under Art. 9 GDPR the consent to which will be the subject of a special notice;
- Telephonic marketing for BUND's statutory purposes, including donations to BUND.

4. Recipients and categories of recipients of personal data

Within BUND, access to your data is only granted to the bodies that require your data for the performance of and compliance with our contractual and legal obligations. Service providers employed by BUND may also receive personal data for such purposes if they are commissioned as processors in accordance with Art. 28 GDPR.

Potential recipients of personal data include, e.g.:

- BUND's state and regional branches that are responsible for your place of residence under the multi-tiered BUND membership, according to the association's statutes;
- Cooperation partners with whom joint campaigns or projects (e.g., participation events) are performed online or through print products;
- Public bodies and institutions (e.g., tax offices or the German Federal Central Tax Office) where there are legal or official obligations;
- Other banks or financial service providers;
- Commissioned processors, e.g., for membership or donation advertising, EDP/IT application support/maintenance, archiving, document processing, call center services, compliance services, controlling, data screening according to legal specifications, personalized letter printing and sending, email sending, data destruction, auditing services or payment transactions;
- Other data recipients on the basis of your consent.

5. Data transfers to third countries or international organizations

We will only transfer data to countries outside of the EU or EEA (so-called third countries) if necessary for the performance of your order, required by law (e.g., reporting obligations under tax law), with your consent or as part of commissioned processing. If we use service providers in third countries, which is currently not the case, they are obliged, in addition to compliance with written instructions, to comply with the level of data protection in Europe through appropriate measures (e.g., EU standard contractual clauses).

6. Data storage duration

BUND will process and store your personal data for as long as is necessary for the performance of and compliance with our contractual and legal obligations on the basis of a weighing of interests in consideration of the respective data category. Data is regularly erased when it is no longer required for these purposes for which it was collected, unless—temporary—further processing, e.g., in a separate archive with limited access authorization, is necessary for the following purposes:

- Compliance with storage obligations under commercial or tax law (e.g., under the German Commercial Code [Handelsgesetzbuch, HGB], the German Fiscal Code [Abgabenordnung, AO], the German Banking Act [Kreditwesengesetz, KWG] or the German Money Laundering Act and the storage and documentation periods specified therein of between 2 and 10 years);
- Maintenance of evidence under the statute of limitations (e.g., the German Civil Code [Bürgerliches Gesetzbuch, BGB] with limitation periods of up to 30 years and a normal limitation period of 3 years).

7. Your further data protection rights

As a data subject, you are entitled to the following further rights, provided that there are no contractual or statutory obligations to the contrary:

- Right of access (Art. 15 GDPR) with the limitations of Section 34 & 35 of the new version of the German Federal Data Protection Act
- Right to rectification of inaccurate data (Art. 16 GDPR)
- Right to erasure (Art. 17 GDPR) with the limitations of Section 34 & 35 of the new version of the German Federal Data Protection Act
- Right to restriction of processing of personal data (Art. 18 GDPR)
- Right to data portability (Art. 20 GDPR)
- Right to lodge a complaint with a competent supervisory authority (Art. 77 GDPR)

Right to object

You have the right to object (Art. 21 GDPR) on grounds relating to your particular situation at any time to the processing of personal data concerning you which is based on Letters e or f of Article 6(1) GDPR.

In addition, you have the right to object at any time to the processing of personal data concerning you for marketing purposes (Art. 21(3) GDPR). You may object to the use of your data for marketing purposes at any time for the future by contacting us using the contact information provided (see Section 1).

8. Data disclosure obligations

In the context of a business relationship (e.g., membership, donation or other agreement), you must disclose the personal data required for the establishment and performance of the business relationship and for compliance with the related contractual obligations, or personal data to the collection of which we are legally obliged. Without this data, we will normally be forced to reject the conclusion or performance of a contract with you or will be unable to perform and may be required to terminate an existing contract with you.