

Privacy Notice for BHM

This privacy statement describes how the Icelandic Confederation of University Graduates, (**here after** „BHM“ or „we“), processes, as in collects, records, stores and shares personally identifiable information about individuals (here after also called “you”). The statement only concerns the processing of personal information regarding BHM members and individuals who visit the confederation’s website, www.bhm.is, or register on the BHM mailing list, whether the information is stored electronically, on paper or otherwise. This includes data processing in connection with the following BHM funds; the Public Sector Relief Fund, The Private Sector Relief Fund, Vacation Fund, Vocational Training Fund and the Career Development Centre.

BHM processes personal information in accordance with current privacy legislation in Iceland at any given time, as well as the relevant agreement regarding the European Economic Area.

Privacy is important to BHM

Powerful privacy policy is a BHM priority and we place great emphasis on respecting the rights of individuals and that all processing of personal information is always in accordance with current regulations and best practices.

Which data do we collect about you and for which purposes?

BHM processes only the personal information that is necessary in accordance with the purpose behind the collection of the information. BHM does not process further personal information for unrelated purposes without notifying individuals and the authorization on which the processing is based.

BHM currently collects only the following personal information:

- identification and communication information, e.g. name and social security number, address, nationality, email, telephone number and, if appropriate, communication history
- data related to members who use the services of BHM’s funds, e.g. health and financial information
- data related to members who use the services of the Holiday Fund, Vocational Education Fund and the University Academic Career Development Center
- information on holiday rentals
- photos of holiday homes when they are returned in bad condition
- financial information, e.g. payment information, paychecks
- technical information, e.g. IP address
- digital footprint, cookies
- information related to the choice of marketing
- conversations through social media and online chat on the BHM website
- information from the National Registry

BHM also collects, if appropriate, the following personal information that could be classified as sensitive personal information:

- Trade union membership, health information in connection with the activities of the above mentioned funds.

It is BHM's policy not to collect personal information about children under the age of 13, except to the extent that this is necessary in connection with sickness allowance in connection with children's illness, maternity grants, travel expenses or adoption grants.

BHM processes personal information only for the purpose of:

- calculating membership fees and contributions to funds as well as assess the right of its members
- interacting with and protecting the interests of its members, including through mailing lists related to BHM and its funds activities
- sending important notifications, e.g. regarding the processing of applications and changes to the rules of funds or to send out surveys
- paying sickness allowance and other grants from the Health Funds, Scholarship funds, Holiday Funds, Vocational Education Funds and University Academic Career Development Centers
- conducting marketing
- performing payroll analysis
- conducting assets and security controls
- responding to inquiries, complaints and compliments from individuals
- meeting the legal requirements of BHM, such as accounting and reporting to the tax authorities
- enabling members of member organizations to vote within BHM

When you use our website www.bhm.is we collect information about your use, i.e. The IP address, type or version of the browser you use, the timing and duration of the visit as well as the subpages you visit within the BHM website.

The legal basis for the collection and processing of your personal data

BHM collects and processes personal information based on the following articles of GDPR:

- Art. 6 paragraph 1 (b) performance of a contract. This authorization applies, in particular, to processing in relation to collective agreements and the agreements of BHM member funds (trade unions) with BHM.
- Art. 6 paragraph 1 (c) legal obligation to which BHM is subject. This authorization is particularly in relation to data that is subject to accounting laws.
- Art. 6 paragraph 1 (f) the legitimate interests of BHM. This authorization is particularly applicable in connection with asset-keeping as well as the collection of receivables.
- Art. 6.1 (a) consent. This authorization applies in particular to marketing material we send to individuals who have given their consent. Individuals are always allowed to withdraw their consent, but individuals can unsubscribe from the mailing list by clicking on the link found at the bottom of such posts. However, withdrawal of approval does not affect the processing that took place during the approval process.

BHM stores personal information for the time necessary to fulfil the purpose of the processing as reported above. The information that is included in accounting records is stored for seven years according to accounting act no. 145/1994.

From whom do we collect your personal data?

We collect personal information from you and in certain cases from outside parties such as employers and public authorities.

Who do we share your personal data with and why?

BHM does not sell your personal information under any circumstances. BHM only discloses personal information to third parties where this is required by law or in the case of a service provider, agent or

contractor hired by BHM to do predetermined work, e.g. in services in connection with information technology.

BHM and its funds need to make certain personally identifiable information available to your union in order to obtain information in order to process an application or other matter with which you have applied to BHM and its funds.

If a party, which BHM shares personal information with, is considered to be a processor, BHM concludes a processing agreement with the party in question. Processing agreements include, among other things, the obligation of the processor to keep personal information secure and not use it for any other purpose.

BHM may also shares personal information with third parties when it is necessary to protect BHM's legitimate interests, such as in the case of collecting receivables.

BHM's privacy statement does not cover third party information or processing, we have no control over or are responsible for the use, disclosure or any other processing they do. We therefore encourage you to familiarize yourself with the third-party privacy statements, including the hosting providers of the sites that may refer to us as well as software companies such as Facebook, Google and Microsoft.

Security of personal information and the notification of a security breach

Security in the processing of personal information is important to BHM and we have taken appropriate technical and organizational security measures to ensure the protection of your personal information in line with our security policy. If there is a security breach regarding your personal information, and if the breach is considered to create serious risk to your freedom and your rights, we will notify you immediately. In this sense, a security breach is considered an event that causes your personal information to be lost or deleted, altered, disclosed or if unauthorized parties gain access to the information. However, here we would like to point out that the personal information you share with us on social media, e.g. BHM's Facebook page is considered public information as BHM has no control over such information or is responsible for its use or disclosure. If you do not intend to share that information with other users or social media service providers, please do not share information on our social media sites. We also encourage you to familiarize yourself with the privacy statements of these parties, Facebook, Google and Microsoft. Please note that when you visit our Facebook page, Facebook may place cookies on your device for diagnostic purposes.

Your rights

Subject to the conditions set out in the applicable data protection legislation, the data subject enjoy the following rights:

- The right to obtain information about what personal information BHM has recorded about you and their origin, as well as information about how your personal information is processed,
- The right to request access to your personal data or request that they be sent to a third party,
- The right to rectification of your personal data
- The right to erasure of your personal data if there is no objective or legal obligation to preserve them,
- The right to objection to the processing of your personal data
- The right to objection to profiling
- The right to withdraw your consent

If you would like to exercise your right, you can send a written inquiry to personuverndarfulltrui@bhm.is. We will confirm receipt of the request and respond to it within one month. If we are unable to respond within a month, we will notify you of the delay. No fee is charged when individuals exercise their rights in accordance with the above, except in cases where a request is considered excessive or obviously gratuitous.

You also have the right to file a complaint to the Data Protection Authorities (Persónuvernd), if necessary. Contact information can be found on their website www.personuvernd.is.

Further information

If you would like more information on issues related to your personal information, we suggest that you contact BHM's Data Protection Officer, via the email personuverndarfulltrui@bhm.is.

Review of the BHM Privacy Statement

BHM's privacy statement is regularly reviewed and updated as needed. Last updated on April 14, 2020.