



HPE Entrust Foundation

Privacy Statement

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1. Introduction

Stichting HPE Entrust Foundation (“the Foundation,” “we,” “us,” or “our”) respects your privacy and is committed to protecting the personal data of everyone who visits our website, supports our work, or participates in our programs. This Privacy Statement explains what personal data we collect, why we collect it, how we use it, and what rights you have under the EU General Data Protection Regulation (GDPR) and other applicable data protection laws.

By using our website (hpeentrustfoundation.org) or otherwise interacting with the Foundation, you acknowledge the practices described in this Privacy Statement.

2. Who is responsible for your data

The Foundation is the “data controller” responsible for the personal data described in this statement. If you have any questions or concerns about how we handle your data, you can contact us at:

- Email: info@hpeentrustfoundation.org
- Postal address: Jacob van Lennepkade 155 H, 1054 ZL Amsterdam, the Netherlands

3. What personal data we collect

Depending on how you interact with us, we may collect the following categories of personal data:

- **Website visitors:** technical data such as IP address, browser type, device type, pages visited, and cookie identifiers (see Section 6, Cookies).
- **Contact form / email correspondence:** name, email address, organization, and the content of your message.
- **Newsletter subscribers:** name and email address.
- **Donors and supporters:** name, contact details, and payment/transaction information necessary to process a donation (payment card details themselves are processed by our payment provider, not stored by us).
- **Program participants, educators, and researchers:** name, contact details, professional/institutional affiliation, country, and information you provide in connection with applications, scholarships, course registrations, payments or collaborations.



- **Board members, partners, and stakeholders:** name, contact details, and organizational role, as needed for governance and partnership purposes.

We do not knowingly collect special categories of personal data (such as health data, racial or ethnic origin, or religious beliefs) unless you voluntarily provide it to us and it is relevant to a program or application, and even then only with appropriate safeguards. If we ask for a photo and biographical information to enhance small-group discussions and networking during online courses, we explicitly ask for a voluntary sharing of this information, and a decline will not affect your eligibility to participate.

4. Why we process your data and our legal basis

We process personal data for the following purposes, relying on the legal bases indicated:

Purpose	Legal basis
• Responding to enquiries and correspondence • Sending newsletters and updates • Processing donations and issuing confirmations • Administering programs, scholarships, and educational activities • EPA course participation in small groups and enhancing networks • Website analytics and functionality • Compliance with legal, tax, and reporting obligations (e.g., as a registered Dutch foundation) • Governance, partnership, and reporting relationships	• Legitimate interest / performance of a request • Consent • Performance of a contract / legal obligation (e.g., financial administration) • Performance of a contract / legitimate interest / consent, as applicable • Consent for sharing personal data • Consent (via our cookie consent tool) / legitimate interest • Legal obligation • Legitimate interest

Where we rely on consent, you may withdraw it at any time, without affecting the lawfulness of processing carried out before withdrawal.

5. Sharing your data

We do not sell personal data. We may share personal data with:

- **Service providers** who process data on our behalf (e.g., website hosting, email/newsletter platforms, payment processors, cloud storage), under data processing agreements requiring them to protect your data.
- **Partner institutions and collaborators** involved in delivering specific programs, only to the extent necessary for that collaboration and, where appropriate, with your knowledge or consent.



- **Authorities**, where required by law (e.g., tax authorities, in connection with our status as a registered foundation).

Because the Foundation works internationally, particularly with educators and institutions in low- and middle-income countries, personal data may be transferred outside the European Economic Area (EEA). Where this occurs, we take appropriate steps to ensure an adequate level of protection, such as relying on the European Commission's Standard Contractual Clauses or equivalent safeguards.

6. Cookies

Our website uses cookies and similar technologies to ensure the site functions properly, to understand how it is used, and — where you consent — for statistics and preference purposes. When you visit our site, a cookie consent banner allows you to accept, deny, or manage your preferences for:

- **Functional cookies** (always active, necessary for the website to work)
- **Preference cookies**
- **Statistics cookies**
- **Marketing cookies**

You can change your cookie preferences at any time via the consent management tool available on our website.

7. Data retention

We retain personal data only for as long as necessary for the purposes described in this statement, or as required by law (for example, Dutch tax law generally requires financial records, including donation records, to be kept for seven years). Newsletter and contact data is retained until you unsubscribe or ask us to delete it, unless a longer retention period is required for legal or administrative reasons.

8. Your rights

Under the GDPR, you have the right to:

- Access the personal data we hold about you
- Request correction of inaccurate data
- Request erasure of your data ("right to be forgotten")
- Restrict or object to certain processing
- Request data portability
- Withdraw consent at any time, where processing is based on consent
- Lodge a complaint with a supervisory authority — in the Netherlands, the **Autoriteit Persoonsgegevens** (Dutch Data Protection Authority), at www.autoriteitpersoonsgegevens.nl

To exercise any of these rights, please contact us at info@hpeentrustfoundation.org.



9. Security

We take appropriate technical and organizational measures to protect personal data against unauthorized access, loss, misuse, or alteration. However, no method of transmission over the internet or electronic storage is completely secure, and we cannot guarantee absolute security.

10. Children's privacy

Our website and services are not directed at children, and we do not knowingly collect personal data from children without appropriate parental or institutional consent.

11. Changes to this Privacy Statement

We may update this Privacy Statement from time to time to reflect changes in our practices or legal requirements. The date at the top of this page indicates when it was last revised. We encourage you to review this page periodically.

12. Contact us

If you have questions about this Privacy Statement or how we handle your personal data, please contact us at: **HPE Entrust Foundation:** info@hpeentrustfoundation.org