

Invirtus Privacy Policy

1. General

Invirtus feels strongly that privacy and protection of personal information is important for all our members. In this privacy policy we will explain how our organization collects, uses, stores and protects the personal data you provide to us. In all cases, we adhere to the general laws and regulations in Europe in general (GDPR) and Belgium specifically (via the Algemene Verordening Gegevensbescherming AVG).

This means that we will always:

- Use your personal data in accordance with the purpose it was provided with us. This purpose and the types of personal data are described in this policy;
- Limit the amount of personal data collected to the minimum needed for our use cases;
- Ask for your explicit permission when needed for processing your data;
- Employ adequate technical and organizational measures to ensure your data is kept safe;
- Refrain from sharing your personal data with third parties, unless this is necessary for the use case for which they were provided to us;

If you have any questions about this policy or the way that Invirtus collects or processes personal data, you can contact us via info@invirtus.be.

2. Why we collect your data

Your personal data is collected by Invirtus for the following purposes and use cases:

- General management of our organization, including membership registration, communication and payment administration
- To enable you to participate in club activities
- To inform you about our club and our activities, for example by sending you invitations and newsletters
- To allow you to interact with your fellow club members through internal communication channels
- To allow you to utilize club documents and materials
- To obtain subsidies from the government

- To adhere to governmental regulations pertaining to running a non-profit, such as keeping a membership list and financial records.
- To adhere to legal requirements around working with minors.
- To assess if you are medically fit to participate in our club activities
- To aid you in case of a medical emergency
- In case of underage members: to obtain legal permission from parents or legal guardians
- To promote and communicate to the outside world, including publishing updates on our club website, social media accounts (e.g., pictures)
- To communicate about the club internally (for example by sharing pictures in internal communication channels such as WhatsApp)

3. The data which we collect

We only collect that personal information that is necessary to allow our club to function normally (within legal regulations) and to reach our goals.

We can ask the following personal data for storage, aggregation, processing and use as described in section 2 above. Note that some data will not be requested/required from everyone, but only required in specific circumstances (e.g., joining the club as a voting member).

- Personal identification: legal name, email address, telephone number, street address, birth date, birth place, nationality
- Personal information of direct contact persons/relatives: name, telephone number, email address
- Social security number (“rijksregisternummer”)
- Payment information
- High-level medical fitness information via the “medical certificate”
- Certifications and diplomas
- Sports-related information (tournament results, international standings, ...)
- Pictures, videos and other media (both in group and individual)
- Proof of clean Criminal Record Extract (“Bewijs van goed gedrag en zeden”) for members in a position of authority that come into contact with minors (e.g., trainers, administrators)

By becoming a paying member of Invirtus, you explicitly agree that your likeness can be used in media (especially pictures and videos) to promote the club (including but not limited to publication on the website, social media accounts, flyers, and newsletters) and to communicate within the club (including but not limited to discussions on internal WhatsApp groups). If you do not wish your likeness to be

used, you can submit a notice to the administration board via info@invirtus.be. After receipt of this notice, club members will take all steps within their power to try and prevent your likeness to be shared with 3rd parties, however without any guarantees. This is contingent on you yourself also undertaking all possible steps to prevent your likeness being captured in club media (e.g., not participating in group pictures).

4. Who has access to the data

General collection, processing and use of most of the provided data is limited to a select number of Invirtus board members and club administrators.

The provided data can be shared with 3rd parties if this is necessary to comply with legal requirements and to obtain the goals of the club.

Currently, we share (limited, strictly necessary) information with 3rd parties for these purposes:

- Obtaining the necessary insurances for our members (medical, theft, ...)
- Insurance providers in case of an incident
- Compliance with non-profit requirements from the government (e.g, keep and share with other members a general membership list, clean criminal record extracts)
- When organizing/participating in an event that you will attend
- Joining the national fencing federation
- Marketing, PR and social media promotion of the club
- When otherwise legally required (e.g., to comply with law enforcement)

Your data can be shared with 3rd parties by the club without notifying you of this beforehand, but only for the purposes described in this document.

Invirtus does everything in its power to ensure that the 3rd parties with which it shares your information have appropriate privacy regulations in place as well to protect your data.

Members themselves are expected not to share with 3rd parties (including but not limited to (AI) photo manipulation systems) information or media shared by others in internal communication channels without first obtaining explicit permission from the people featured in said information or media.

In case of the Criminal Record Extracts (“bewijs van goed gedrag en zeden”) there is a separate procedure in place to guarantee the privacy of the submitters. They will be asked to either present the physical document in person to the Chairman of the

club, or to upload the document to a neutral online service where it can only be accessed once by the Chairman, to check its contents. After this, the file is removed and only the result of the check (contact with minors allowed/not allowed) is logged in a separate register. In the case where the Chairman themselves need to provide an extract or where the Chairman is unavailable, the Treasurer will act as backup/replacement.

5. How we store your data

Invirtus does not store your data for longer than required by law or for the execution of its goals.

If you stop being an official member of the club, any medical information is deleted immediately. Other information (e.g., general contact information) can be kept past the end of your membership for archival purposes, but for no longer than a period of 3 years. An exception is made for pictures and other media, which can be kept and used beyond the 3 years period unless explicitly requested.

All data is stored in a Google Workspace account maintained by the club. Invirtus uses existing Google identity and access management mechanisms (including username and password, 2FA) to limit who has access to the data.

Additionally:

- All club members with access to your data are bound to adhere to this privacy policy and to keep the data safe.
- We only share specific forms of personal data with specific individuals for the specific use cases they require it for. Separate forms of data are stored and access controlled in separate ways.
- When appropriate, we pseudonimize and/or encrypt your data
- We makes systematic encrypted backups of the data that are stored on a separate Google account for recovery purposes

6. Your data protection rights

You have and retain the right to access, copy, change/update or remove (if you are no longer an active member) your personal data.

You have the right to object to the processing or use of your personal data by our club or by one of our members.

You have the right to ask Invirtus to transfer your personal data to yourself or to another organization.

To exercise any of these rights, you can contact us on info@invirtus.be. In some cases, we might ask you for further identification to verify your identity before complying to the request. We commit to treating all requests within 1 month of reception.

You also always have the right to submit a complaint with the Belgian gegevensbeschermingsautoriteit (GBA):

Drukpersstraat 35

1000 Brussel

<https://www.gegevensbeschermingsautoriteit.be/>

7. Changes to the privacy policy

Invirtus reserves the right to make any changes to this privacy policy at any time.

The last recorded change happened on 4 September 2026, to add provisions regarding processing of Criminal Records Extracts for members in a position of authority working with minors.

Inspired by:

<https://hallebardiers.be/wp-content/uploads/2023/06/Privacyverklaring.pdf>

<https://gdpr.eu/wp-content/uploads/2019/01/Our-Company-Privacy-Policy.pdf>