

EPOA Privacy Statement

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1. Who we are

European Pride Organisers Association aisbl (EPOA) is a European network of Pride organisers and LGBTI+ Pride organisations.

EPOA is the controller for the personal data described in this privacy statement. You can contact us about privacy and data protection matters at **secretary@europride.info**.

2. Why do we collect personal data?

EPOA processes personal data for the following purposes:

- Contact information to our members to administer EPOA memberships, including collecting membership fees and maintaining the membership database.
- Communicate with member organisations and their representatives.
- Share reciprocal membership information with InterPride for members that hold dual-membership with both EPOA and InterPride.
- Send membership newsletters and updates to e-mail addresses that have subscribed to our e-mail newsletter service.
- Collect human-rights status reports, surveys and communicate with LGBTI+ activists and pride organisers about their situation.
- Organise webinars, meetings and events for those who have subscribed to them.
- Maintain governance and legal records for EPOA, including voting and signing procedures during general meetings.
- Operate internal communication channels and records systems, including e-mail inbox and cloud document storage for all board members.
- Maintain optional membership community chats used by members who wish to communicate with each other.
- Communicate our activities through social media channels and collect audience statistics from social media users.

3. Sensitive personal data

Since EPOA is an LGBTI+ Pride organisation, personal data processed by us may reveal or suggest a person's involvement in Pride organising, LGBTI+ advocacy, human-rights work or similar protected activities. In some contexts, this may amount to special-category data under the General Data Protection Regulation (GDPR).

As a non-governmental civil society organisation operating in the LGBTI+ and pride event field, we have a legal basis for processing sensitive categories of data, such as data that may reveal sexual orientation and gender identity, as outlined in GDPR Article 9(2)(d).

4. What type of personal data do we collect?

Membership Administration

EPOA processes membership information to maintain accurate records of member organisations and their contact persons.

This may include:

- Name of the member organization
- Name of contact person or contact persons
- Role or position
- Email address
- Telephone number
- Membership category
- Membership status
- Payment status
- Correspondence with EPOA

The data subjects are usually volunteers or staff associated with a member organisation.

Newsletters

EPOA sends membership newsletters, updates and other relevant communications to member contacts and subscribers.

This may include:

- Name;
- Email address
- Organisation
- Mailing-list preferences
- Unsubscribe status
- Engagement data, such as whether an email was opened or links were clicked, where this functionality is enabled.

Surveys and Research

EPOA may collect status reports and information about current human-rights affairs affecting Pride organisations, LGBTI+ communities, activists and human-rights defenders.

This may include:

- Name
- Contact details
- Organisation or affiliation
- Role
- Country or region
- Communication preferences
- Information about human-rights developments
- Information about threats, restrictions, incidents or safety concerns; and
- Any other information voluntarily provided by the person contacting EPOA.

5. What is our legal basis for processing personal data?

The lawful basis is EPOA's legitimate interest in administering and managing its membership base. Where the processing may reveal special-category data, EPOA relies on GDPR Article 9(2)(d), applying for not-for-profit organisations.

The lawful basis for personal data processed in connection with newsletter is consent. The consent may be withdrawn at any time by unsubscribing to the newsletter.

6. Who do we share personal data with?

EPOA administrates its membership through Wild Apricot, a membership management system operated by Wild Apricot Inc. A data processing agreement is entered into between EPOA and Wild Apricot.

EPOA uses Microsoft for internal communications and records, including cloud storage of its documents. Zoom is used for online webinars and conferences. WhatsApp is used as a voluntary group chat for members and to supply information as a supplement to the e-mail newsletters. Data processing agreements are entered into with Microsoft, Zoom and WhatsApp (Meta Inc.).

We may also use other tools, for example, in connection with voting and election administration during the general meeting. All such tools are validated before being used, including ensuring that a valid data processing agreement is in place.

In communications with LGBTI+ activists and pride organisers for surveys and research, we may use other communication channels as requested.

EPOA shares information with Facebook and Instagram (Meta Inc.) and LinkedIn (Microsoft Inc.) for social media activities. EPOA is a joint controller together with Meta Inc. and Microsoft Inc. for personal data processed on Facebook, Instagram and LinkedIn.

Audience statistics is made available both to EPOA and to the social media platform (Meta Inc. and Microsoft). Audience statistics may include information such as location, engagement, interaction, viewing behaviour, preferences and demographic or professional information, depending on the platform.

6. Do we share data outside of Europe?

Some personal data may be transferred to, stored in, or accessed from countries outside Europe. This may occur, for example, where:

- WildApricot stores or processes membership data in the United States;
- InterPride accesses reciprocal membership information from the United States;
- Microsoft and Zoom provide support, routing, security, operational or other services outside Europe;
- WhatsApp or Meta services involve processing outside Europe.

Where personal data is transferred outside the EEA, EPOA relies on an appropriate transfer mechanism defined in the data processing agreement.

7. Security measures

EPOA uses technical and organisational measures appropriate to the nature and sensitivity of the personal data processed.

These measures include:

- Role-based access controls;
- Password protection;
- Two-factor or multi-factor authentication where available;
- HTTPS encryption;
- Secure communication channels where appropriate;
- Limiting access to people who need the data for their role;
- Restricting access to human-rights and activist information;
- Using trusted service providers;
- Reviewing and updating membership data;
- Deleting or anonymising data when it is no longer needed;
- Adapting communication channels to activist safety preferences; and
- Encouraging careful handling of sensitive information.

8. Storage periods

EPOA keeps personal data only for as long as necessary for the purposes described in this statement, unless a longer retention period is required or permitted by law.

- Membership contact data is retained while the organisation is a member and for up to 18 months after the member has failed to renew the membership, unless legal or accounting rules require longer retention.
- Newsletter data is retained until consent is withdrawn (unsubscribe).

- Administrative records, accounting and invoice records are retained for the period required under Belgian law, normally five years.
- Human-rights and activist information is retained for the duration of the relevant partnership, case, advocacy activity or support relationship.

9. Your rights

You have the right to:

- Request access to your personal data;
- Request correction of inaccurate or incomplete data;
- Request deletion of your data;
- Request restriction of processing;
- Object to processing based on legitimate interests;
- Withdraw consent where processing is based on consent;
- Request data portability where applicable; and
- Lodge a complaint with a data protection authority.

If you withdraw consent, this does not affect processing that took place before withdrawal.

To exercise your rights, contact EPOA at info@europride.info. We may need to verify your identity before responding.

10. Complaints

If you have concerns about how EPOA processes personal data, please contact us first so that we can try to resolve the issue.

You also have the right to lodge a complaint with the Belgian Data Protection Authority:

Belgian Data Protection Authority

Autorité de protection des données / Gegevensbeschermingsautoriteit

Website: www.dataprotectionauthority.be

You may also contact your local data protection authority if you are located in another EEA country.

11. Changes to this privacy statement

EPOA may update this privacy statement from time to time. The latest version will be published on our website and will show the date of the most recent update.