



# GDPR Privacy Statement Divine Balance

## General Data Protection Regulation (GDPR)

Privacy statement for visitors or users registered for the Shop or Newsletter on the website of the company Divine Balance <https://www.divinebalance.eu>

### 1. What is an HTTPS website ?

HTTP Secure (HTTPS) is an extension of the Hypertext Transfer Protocol (HTTP) for secure communication over a computer network, and is widely used on the Internet. In HTTPS, the communication protocol is encrypted by Transport Layer Security (TLS), or formerly, its predecessor, Secure Sockets Layer (SSL).

The principal motivation for HTTPS is authentication of the accessed website and protection of the privacy and integrity of the exchanged data while in transit. It protects against man-in-the-middle attacks. The bidirectional encryption of communications between a client and server protects against eavesdropping and tampering of the communication.

In practice, this provides a reasonable assurance that one is communicating without interference by attackers with the website that one intended to communicate with, as opposed to an impostor.

Historically, HTTPS connections were primarily used for payment transactions on the World Wide Web, e-mail and for sensitive transactions in corporate information systems.

Since 2018, HTTPS is used more often by web users than the original non-secure HTTP, primarily to protect page authenticity on all types of websites; secure accounts; and keep user communications, identity, and web browsing private

### 2. What information do we collect ?

What information do we collect, for what purpose and through which technical means?

In general, registration is required:

- if access to a site is restricted to authorised persons
- if there is a simple need for the site to remember you between visits and adapt itself to your needs or wishes
- to allow you to receive further information that you have requested, such as newsletters and information updates
- to grant you individual privileges that you might request or otherwise be entitled to

We store the information that you provide on the registration form (if you registered yourself) or that your organisation provides directly to us. By logging in and accessing accounts you are indicating your consent to the use of the data as described in this statement.

The data obtained from the registration process includes both personal details and, if you are registered as a representative or member of an organisation, details related to your link with that organisation.

*Personal details* include your names, geographical location, e-mail address and telephone number. Concerning your organisation, the details may include its name, the department you work for, your office address, the nature of your relationship with the organisation (e.g. employee), your roles and job title and, in order to avoid creating duplicate records, a unique identifier. Information that is obtained from your organisation is subject to the regulations concerning the transfer of personal data and may be only a subset of that mentioned.

The account that we create contains enough information for us to have reasonable confidence that its subsequent usage is by yourself or someone with access to the information you provided (including the password).

We also store certain additional information (listed below) relating to the activity on the user account that we create for you, so that we can protect both your identity and the integrity of the shop that you access.

The additional information is used to diagnose and resolve problems and to deal with security incidents. Much of it relates to attempts to use an identity and thus to events that occur before a user has successfully authenticated.

Users can inspect all the data that is maintained about their own account, allowing them to check that their account has not been used, and that attempts have not been made to use it, without their knowledge.

We may collect the following additional data about each user:

- Date and time of
  - most recent successful and unsuccessful authentication
  - last change of password
  - last password reset
- Number of good logins and failed attempts
- Your most recent passwords - to make sure you follow the prevailing security policy regarding password re-use.

When you login and / or change your password, we may record further information in log files, such as the IP address used, in line with the purposes stated above. This information can help in following up any doubtful activity relating to your account. It will **not** be used to monitor your activity, except to allow the removal of the account when no longer used.

*Note: use of cookies*

EU Login uses cookies to allow you to log in to different applications without re-entering your email address and password. These cookies contain no personal information whatsoever, merely a pointer allowing the authentication service to find your entry in its own tables. The cookies are 'per-session' cookies, i.e. they are destroyed when you close your browser. If you have chosen the option for your browser not to accept such cookies, you will not benefit from this feature and will have to re-authenticate yourself each time you log in to a different client application of the authentication service. A persistent cookie may be created for your convenience in order to record your choice of language, and at your discretion, your email address. In the absence of this cookie, the default language is English.

### **3. Who has access to your information and to whom is it disclosed?**

By registering yourself, you authorise the disclosure of the details you have entered in the user registration system to the site that you access after having given your email address and password.

The details of the activity associated with your account are never passed to any other.

We will not divulge your information to third parties.

### **4. How do we protect and safeguard your information?**

Divine Balance stores your personal information in secure computers and your information can only be accessed by the Ceo of Divine Balance or our webmaster.

When you login, the password is always encrypted on the network and is decrypted for checking against the stored password by the authentication service, not by the individual site. All passwords (including previous passwords mentioned above) are stored in a form that permits them to be checked against a supplied value, but their actual value cannot be derived from the stored value.

The details about your user account are available only to yourself and the service administrators.

If you registered yourself directly, you should be aware that anyone with access to read your e-mail may be able to use the account you create and acquire the identity it represents. You are responsible for assessing the risk that this presents to you personally.

Similarly, certain users are allowed to reset their password using e-mail. They should bear in mind that anyone else with access to their e-mail (because of automatic forwarding, delegation or other reasons) will be able to reset the password.

For this reason, in order to perform important business or access sensitive information, Divine Balance requires more stringent identity checks and your account will need to be set up or transformed specifically for this purpose. You will need to contact the relevant Commission department or a delegated representative in your organisation to achieve this.

If you have any reason to believe that your password has been compromised – for example, if your password appears to have been changed without your knowledge - you should notify your normal support contact or contact Divine Balance as described on the user registration and authentication pages.

#### *Notes:*

In principle, and especially if you have access to sensitive systems, you should never reveal your password to anybody else: it is a secret only you should know. In particular, your EU Login password should only ever be entered on screens showing the approved EU Login logo. Do not enter it if you have doubts about the authenticity of the EU Login site.

When you enter your password, make sure your browser indicates (usually by means of a padlock or other icon) that you are on a secure connection and that you are connected to a Commission site address (e.g. ec.europa.eu, webgate.eu-admin.net).

### **5. How can you verify, modify or delete your information?**

You can verify your account information, including the data recorded about activity on your account, in the pages of either the user registration service or the authentication service.

If you registered yourself you will be able to change or remove any personal information online.

## **6. How long do we keep your data?**

Divine Balance keeps your data for as long as you are recorded as an active user and for a period of one year thereafter. Data concerning users automatically registered from internal sources may be kept for as long as it is retained in the source system. If you were registered through a third party, the period of activity will usually correspond to a contractual link with that party or be subject to an expiration date. In other cases, Divine Balance will consider you active as long as you continue to use your account or until your account expires.

Note that in the case of users who registered with IMS themselves, the period of one year is extended in order to allow the exchange of e-mail with a user. This exchange will provide for the user to request an extension, thus resetting to zero the recorded period of inactivity. In the absence of a response from the user, all personal data will be erased.

Data from Divine Balance is backed up regularly by Divine Balance to ensure a correct system restore if necessary to restart operations. Furthermore, Divine Balance is closely monitored and all sensitive actions on the system are logged, including each authentication request. These logs (log files) are rotated regularly and removed from the active system after a maximum of six months in accordance with REGULATION (EC) No 45/2001. All log files backed up by the standard Divine Balance backup procedure will not be removed from back-up tapes until those tapes are recycled, but that log data will not be restored if system restore is required.

## **7. Contact Information**

If you wish to ask questions or post complaints about the service with respect to the use of your personal information, you should follow the contact link that is shown on the contact page.