PERSONAL DATA PRIVACY POLICY
SUPPORTED INDIVIDUALS

CIVIL RIGHTS DEFENDERS

INFORMATION ON PERSONAL DATA PROCESSING

The protection of human rights is the most fundamental value at Civil Rights Defenders. This includes your integrity. When we support human rights defenders, provide support to you as a victim or individual in need of our assistance, for example through our emergency fund or as part of the Natalia project, or when you are an individual closely related to such person, we need to handle personal data about you and your situation. This handling (or "processing" as it is officially called) is governed by certain legislation, which for Civil Rights Defenders as an organization seated in the European Union mainly is the General Data Protection Regulation (the "**GDPR**"). We are of course keen to adhere to the rules in the GDPR, but also to be transparent and inform you about what we do with your personal data, which is why we have drafted this document. Below, you will find information on what kind of personal data we process within the scope of our support methods, why we process it, what we use it for and how we might share it.

The data processing activities described in this document are conducted by Civil Rights Defenders, reg. no. 802011-1442, as data controller.

WHEN WE COLLECT DATA AND WHAT DATA WE COLLECT

Within the scope of Civil Rights Defenders' activities to support the protection of human rights around the globe, we collect personal data in the following situations:

(i) When we support individual human rights defenders or defenders at our partner organizations,

(ii) When someone applies for our emergency support or to become part of the Natalia project and during the time we provide such support,

(iii) When someone has been submitted as a contact person by a person applying for our emergency support or to become part of the Natalia project (or a person closely related to the applying individual), and

(iv) When we provide arrange capacity building activities.

The personal data will in general contain your name and contact details. If you are a human rights defender, it will also include where you are located, which organization and what objective you work for, and under which circumstances you are working (such as if there is an immediate threat or the alike). Should you apply for emergency support it will also include any information you provide in your application, future reports and the assistance we have provided to you. We are aware that this might include special categories of personal data (so-called "sensitive personal data") such as data relating to your political opinion, religious views, health or sexual orientation and that certain extra strict rules apply to such personal data. For participants in the Natalia project, we collect the same information but also your geographical location by the use of a bracelet or similar object with GPS functionality that we provide to you. This will however only be the case either when you have activated that function or when we test whether the GPS functionality is working. The location data will be sent to one or a few designated devices at Civil Rights Defenders. If you have been submitted as a contact person, we might in addition to your name and contact details also gather information on your relation to the individual in need.

We may further collect some information from publicly accessible sources.

WHY WE PROCESS DATA, OUR LEGAL BASIS FOR THE PROCESSING AND FOR HOW LONG WE PROCESS THE DATA

When personal data is processed, a specific purpose and an applicable so-called "legal basis" is always required. Also, the personal data may only be used for a limited period of time. Civil Rights Defenders will only use your personal data for the purposes set out below. We will not use your personal data for any purpose that is incompatible with the below purposes. Further, we will only use your personal data during the period as set out in the right column. Please note that the storage periods below may not apply if Civil Rights Defenders is required to retain your personal data (partly or in full) under applicable mandatory law.

Where consent is our legal basis for processing your personal data, any such consent given to Civil Rights Defenders may be withdrawn at any time by contacting us. Please note that this would not affect the lawfulness of the processing carried out prior to such withdrawal.

PROCESSING ACTIVITY	LEGAL BASIS	STORAGE PERIOD
Human rights defenders. If you are a human rights activist, at any of our partner organizations or as a partner yourself, we will process your personal data. In such case, you may also be covered by other types of processing (e.g. if we provide training to you, write statements or articles about your or if you are a supported individual).	The processing of your contact details is based on that the processing is necessary in order for us to be able to see to our legitimate interest in remaining in contact with you. With regard to other processing activities, please refer to those activities.	The personal data will be processed for as long as you are working for any of our partner organizations or are a partner yourself.
Emergency support and participants in the Natalia project. When you apply for emergency support or to participate in the Natalia project, we process your personal data in order for us to assess whether you should receive support and provide you with such support, as we might need you to provide us with some information including personal data. Such information may include sensitive personal data. During the time of our support provision, we may receive additional information (such as regarding your geographical position if you participate in the Natalia project) in order to be able to act and support you in the best way.	Our legal basis for this processing is that it is necessary for the performance of the contract with you or in order to take steps at your request prior to such contract. In the event we process sensitive personal data about you, this will be carried out on one of the following legal bases: • The processing relates to personal data you manifestly have made public (art. 9.2 (e) of the GDPR). • The processing is carried out in the course of Civil Rights Defenders' legitimate activities, where the personal data is kept within Civil Rights Defenders' organization (art. 9.2 (d) of the GDPR). • The processing is necessary to protect your vital interests, where you are physically or legally incapable of giving consent (art. 9.2 (c) of the GDPR).	We will store your personal data for as long as you receive support or is a participant in the Natalia project. After such time, your personal data is erased or anonymized within One year.

PROCESSING ACTIVITY	LEGAL BASIS	STORAGE PERIOD
	Where we need to process sensitive data about you and no other legal basis is suitable, we will collect your explicit consent.	
Registering you as a contact person. Where it is not you, but another individual, who has requested support, you may have been submitted as a contact person. We will need your personal data in order to contact you in an emergency situation.	The processing is necessary for Civil Rights Defenders to achieve its legitimate interest in having a contact person of the supported individual, for emergency situations. You may at any time object to be a contact person by contacting us.	The personal data will be kept for the same time period as the data about the supported individual is kept, unless you object to our processing of your personal data.
Capacity building activities. If you attend any of our trainings, Defenders' Days or other specific events, we will process your personal data. This may be sensitive personal data, for example if we ask for background information due to the certain subject of the training at hand. The purpose of the processing is to arrange the activities but may also be to handle closely related matters such as booking tickets for you.	The processing is necessary in order for us to be able to fulfil our agreement with you (i.e. arrange the activities).	The personal data will be kept until the relevant activity has been held and deleted within 6 months thereafter. If you are a partner or work for a partner organization, we will keep a record of which types of trainings and events you previously have attended.
Writing advocacy statements and other documentation specifically about you to promote your and/or our cause. If you are a supported individual or other person that we would like to spread information on, we may wish to write and publish articles, statements etc. specifically about you in order to promote your cause and/or promote our own work. Such texts may be published on our website, sent to our subscribers and others who receive our send-outs, be printed and shared in other ways. The documentation may include the processing of sensitive personal data that you have provided to us within the scope of our provision of support to you.	As these actions may include processing of personal data that you have entrusted us with, we will only do this provided we have received your explicit consent.	The personal data will be processed during the time we draft the texts and kept thereafter for 6 months. After this, the personal data will be erased or anonymized.
Writing general articles. If you are one of the individuals mentioned in this document, we may in some cases write general articles in which you, including non-sensitive personal data and/or personal data made	In this case, the processing is carried out for journalistic purposes under the derogation set out in art. 85 of the GDPR and the Swedish Supplementary Data Protection Act.	These articles may, for journalistic purposes, be kept without limitation in time.

PROCESSING ACTIVITY	LEGAL BASIS	STORAGE PERIOD
publicly available by you, are mentioned.		

WHO WE SHARE YOUR PERSONAL DATA WITH

Only the people who need to process personal data for the purposes mentioned above have access to your personal data. Civil Rights Defenders may need to share your personal data with other companies in order to provide you with the support you have requested and to assist you, such as other organizations promoting human rights, banks, travel agencies etc. In each such situation, we will of course limit the amount of data that we share to the extent possible and will only share data that we lawfully may share.

We further may need to allow our suppliers access to your personal data when they perform services on our behalf, mainly to provide support and maintenance of IT systems and storage services.

Any transfer of data outside the EU/EEA is made in line with data protection laws. Normally, transfers outside the EU/EEA will only occur (and will be based on that legal basis) where the transfer is necessary for the performance of the contract between you and us. Any other international transfers of personal data are normally based on the EU Commission's standard contractual clauses unless the company resides in a country considered by the EU Commission to ensure an adequate level of protection. The standard contractual clauses may be found here. In addition, transfers to the U.S. may be based on the EU-U.S. Privacy Shield if the recipient is certified thereunder.

Finally, any articles, advocacy statements and other documentation that we write about you and which are *not* covered by the journalistic exemption (i.e. the type of articles mentioned under "Writing advocacy statements and other documentation specifically about you to promote your and/or our cause" in the table above) may be sent to recipients or otherwise be made available outside the EU/EEA. We will not do this unless you have provided your explicit consent to such transfer outside the EU/EEA. Please note however that we may publish such documentation on our web page which is accessible worldwide.

RIGHTS UNDER THE GDPR

In case you have any questions regarding Civil Rights Defender's processing of your personal data, please use the contact details at the bottom of this document. You may also use these contact details if you would like to exercise any of your rights as a data subject under the GDPR. Please note that the rights under the GDPR are not unconditional. Therefore, an attempt to invoke any of the rights might not lead to an action. Your rights under the GDPR include the following:

- **Right to access** – According to article 15 of the GDPR, you are entitled to access your personal data and receive certain information about the processing. That information is provided in this document.
- **Right to rectification** – According to article 16 of the GDPR, you are entitled to obtain rectification of inaccurate personal data concerning you and to have incomplete personal data completed.
- **Right to erasure** – Under certain circumstances, you are according to article 17 of the GDPR entitled to have the personal data erased. This is the so-called "right to be forgotten".

- **Right to restriction of processing** – Under certain circumstances, you are according to article 18 of the GDPR entitled to restrict the processing of the personal data that Civil Rights Defenders carries out.
- **Right to data portability** – You are according to article 20 of the GDPR entitled to receive the personal data (or have your personal data directly transmitted to another data controller) in a structured, commonly used and machine-readable format from Civil Rights Defenders.
- **Right to object** – According to article 21 of the GDPR, you are entitled to object to certain processing activities conducted by Civil Rights Defenders on the personal data, such as all Civil Rights Defenders' processing of the personal data based on Civil Rights Defenders' legitimate interest.

Finally, you also have the right to lodge a complaint with the supervisory authority.

DATA SECURITY

As the information we collect about you might be of a highly sensitive nature, we employ high-end technical and organizational security measures to help protect your personal data against loss and to guard against access by unauthorized persons. The security measures we have taken include implementing secure private connections, traceability, disaster recovery and access limitations. We regularly review our security policies and procedures to ensure our systems are secure and protected.

GENERAL CONTACT DETAILS

Please use the following details if you would like to contact us.

Civil Rights Defenders

Sergels torg 12, floor 12

SE-111 57 Stockholm

SWEDEN

E-mail: info@crd.org

Telephone: +46(0)8-545 277 30

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