

EXTERNAL PRIVACY POLICY

For Civil Rights Defenders, the protection of human rights is more important than anything else. This includes the protection of individuals' integrity and personal data, which is governed by the General Data Protection Regulation (GDPR).

INFORMATION ON PERSONAL DATA PROCESSING

We have chosen to be transparent as to the manner in which we process personal data, e.g. in respect of our members, donors and subscribers to our newsletter. Naturally, we do so in accordance with the rules of the General Data Protection Regulation. Below, you can read how we process the personal data of various individuals, why we do so, for what period of time, and with whom we might share the personal data.

Civil Rights Defenders, reg. no. 802011-1442, is the data controller for the processing of personal data described below.

All processing of personal data and marketing carried out by us takes place in accordance with the Swedish Fundraising Association's guidelines.

WHEN WE COLLECT DATA AND WHAT DATA WE COLLECT

We collect and process your personal data in several situations, such as (i) when you make a donation to us or become a member, (ii) when you subscribe to our newsletter or sign up for one of our events, (iii) when you apply for a job or internship with us, and (iv) when we find you interesting because we think you can contribute to our activities. The information we gather normally consists of contact information such as names, telephone numbers, addresses and/or e-mail addresses. In certain cases, it also includes your title and the organisation represented by you. Depending on the purpose to be fulfilled, however, other personal data may be necessary, e.g. your personal identification number and bank account number if you make regular contributions to us via autogiro, your professional experience when you apply for a job with us or the type of business you conduct if you are a potential donor. In such case, we may also obtain information from publicly available sources.

In situations where we gather personal data directly from you, i.e. when you choose to become a member, make a donation, subscribe to our newsletter, sign up for one of our events or apply for a job with us, we will tell you which information is mandatory in order for us to be able to fulfil our part of the agreement, e.g. to send a newsletter to you.

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

The processing of personal data is permissible only where there is a specific purpose for the processing and an applicable so-called "legal basis". Furthermore, processing of personal data is permissible only during a limited period of time. Civil Rights Defenders will only process your personal data for the purposes set forth below and at no time for any purpose which is otherwise incompatible with those purposes. Furthermore, we will only process personal data for the period of time set forth in the centre column in the table below. Please note that we may be compelled to deviate from the time limits in the table in cases in which

we must process your personal data in order to comply with, or demonstrate that we comply with, applicable legislation, e.g. the Swedish Accounting Act. In such cases, however, we will only process your personal data to the extent such laws so require or make it necessary for us to do so.

PROCESSING	LEGAL BASIS	STORAGE TIME
<p>Members. If you become a member of Civil Rights Defenders, we will process your personal data to keep a record of our members and to communicate with you.</p>	<p>Processing is necessary in order for us to be able to fulfil our agreement with you (i.e. maintain the membership).</p>	<p>We will process your personal data until you decide to terminate your membership. After that, we'll erase your personal data within 1 year.</p>
<p>Donors. If you make a regular (e.g. monthly) donation to Civil Rights Defenders or have made a donation to us at any time, you are registered with us in order for us to make it possible for you to make payments, to maintain our relationship with you, and to send information to you regarding our operations, e.g. our annual report.</p>	<p>In conjunction with regular donations, processing is necessary in order for us to fulfil our agreement with you (i.e. make it possible for the same amount to be withdrawn from the same account, e.g. every month) and that we can see to our legitimate interest in collecting additional contributions for our activities. If you have made a donation on one or more separate occasions, all processing is based on our legitimate interest.</p>	<p>We retain your personal data for three years after you have made your last donation to us. However, you can unsubscribe to our send-outs at any time.</p>
<p>Newsletter. If you subscribe to our newsletter, we will obtain your e-mail address and name in order to be able to send the newsletter to you. You can unsubscribe at any time by using a link in the newsletter.</p>	<p>Processing is necessary in order for us to be able to fulfil our agreement with you (i.e. provide the newsletter requested by you).</p>	<p>We will process your personal data until such time as you unsubscribe from our newsletter.</p>
<p>Events. If you have signed up for one of our events, we will process your personal data in order to make your participation possible. This may include sensitive personal data, e.g. if you state that you require special assistance because you use a wheelchair.</p>	<p>The processing is necessary in order for us to be able to fulfil our agreement with you (i.e. arrange the event you wish to attend). To the extent we collect sensitive personal data, we will gather your explicit consent. As regards our subsequent processing,</p>	<p>We will process your information until the event is held. Thereafter, we might contact you because we regard you as a potential donor but, if you do not make a donation, we will remove you from our register after</p>

	<p>kindly refer to “Send-outs and contacts within the context of our fundraising work” and “Send- outs within the context of our advocacy work”.</p>	<p>a period of not more than six months.</p>
<p>Job applications. In the event you apply for a job or internship with us, we will process your personal data, i.e. the information provided in your documents, in order to determine whether we will employ you.</p>	<p>The processing is necessary in order for us to be able to fulfil our agreement with you (i.e. process your application).</p>	<p>We will retain your application until the employment process is concluded.</p>
<p>Send-outs and contacts within the context of our fundraising activities. As a non-profit association, we are dependent on donations in order to be able to conduct our activities and protect human rights. One way we do so is by means of send-outs to and contacts with persons we regard as potential donors. This may for example be relevant to persons we have encountered in the course of our activities and media monitoring or who appear in the registers we have ordered.</p>	<p>The processing is necessary in order for us to be able to see to our legitimate interest in collecting additional donations for our activities.</p>	<p>In the event you appear in a register which we have ordered or if you are an individual we consider a potential donor, we will contact you within three months after we have received or registered your personal data. If you do not respond, your personal data will be erased after not more than three months following our first send-out or contact. If you choose to make a donation to us, we will process your personal data in accordance with the above.</p>
<p>Send-outs within the context of our advocacy work. Our work involves contacting journalists, politicians and others we believe can benefit the protection of human rights in the world. If you are in such a position, you may accordingly be contacted by us and you may appear in our register of persons we wish to contact. For example, this may consist of an invitation from us for you to join an event or information regarding current</p>	<p>The processing is necessary in order for us to be able to see to our legitimate interest in conducting advocacy work for protecting human rights.</p>	<p>We will retain your personal data so long as we believe you should receive it or until such time as you state that you no longer wish to be contacted by us.</p>

<p>events in our operations. We may adapt our send-out to you, e.g. depending on your profession or where you are geographically located. If you do not wish to receive our send-outs, you can object at any time.</p>		
<p>Contact persons. If you work for a supplier, partner organisation or another company or organisation that works with Civil Rights Defenders and you are the designated contact person, we will process your personal data to keep in touch with you in business related matters. You may object at any time.</p>	<p>The processing is necessary in order for us to be able to remain in contact with our business partners.</p>	<p>We will retain your personal data for as long as we cooperate with your company or organisation and delete your personal data within 6 months after such cooperation ceases.</p>

We also analyse visitor statistics and visitor behaviour on our website, but this is done in respect of anonymised data and on an aggregated level, which means that we will at no time track any individual visitor's behaviour.

WHO WE SHARE YOUR PERSONAL DATA WITH

Only persons who need your personal data in order for us to be able to fulfil the purposes set forth above will have access to it. However, we may need to share personal data with third parties in order to achieve such purposes. Normally, these third parties process personal data on behalf of us as so-called "data processors", e.g. by providing storage services, marketing services or IT systems.

The aforementioned sharing may entail that your personal data is transferred outside the EU/EEA. In the event this occurs, it will be in accordance with applicable data protection rules and provided that the recipient resides in a country considered by the EU Commission to ensure an adequate level of protection, or that you have provided your explicit consent to the transfer, or that the transfer is based on the EU Commission's standard contractual clauses (provided that they are enforceable in the destination country).

RIGHTS UNDER THE GDPR

If you have any questions regarding our processing of your personal data, you should direct them to info@crd.org. You may also use the contact information at the bottom of this document. This contact information may be further used if you desire to exercise any of your rights in accordance with the General Data Protection Regulation. Please note that these rights are not absolute, and a request to exercise such right will not always result in any action. Your rights under the GDPR include the following:

- **Right to access** – According to Article 15 of the General Data Protection Regulation, a data subject is entitled to access to his or her personal data and certain information concerning the processing thereof. That information is presented in this document.
- **Right to rectification** – According to Article 16 of the General Data Protection Regulation, a data subject is entitled to rectification of incorrect information and completion of incomplete personal data.
- **Right to erasure** – Under certain circumstances, a data subject in accordance with Article 17 of the General Data Protection Regulation is entitled to the erasure of his or her personal data. This is the so-called “right to be forgotten”.
- **Right to restrict processing** – Under certain circumstances, data subjects are in accordance with Article 18 of the General Data Protection Regulation entitled to restrict processing by the data controller.
- **Right to data portability** – According to Article 20 of the General Data Protection Regulation, data subjects are entitled to obtain their personal data (or have them transferred to another data controller) in a structured, commonly used and machine-readable format.
- **Right to object** – According to Article 21 of the General Data Protection Regulation, a data subject is entitled to object to particular personal data processing, e.g. all processing based on Civil Rights Defenders’ legitimate interests.

Finally, all registered individuals are entitled to lodge a protest with the supervisory authority which, in Sweden, is the Swedish Data Protection Authority.

COOKIES

We use cookies on crd.org. A cookie is a small text file which is sent to a web browser from a server and is stored on your computer for a pre-determined period of time. Cookies are often used to improve your experience as a visitor to a website, for example by recalling your choice of language settings. We use cookies to measure traffic, visitor behaviour and the effects of our marketing. The statistics help us work even smarter and more effective in our efforts to make more people take a stand for human rights around the world and strengthen our communications.

No personal data is saved since this is done in respect of anonymised data and on an aggregated level, which means that we will at no time track any individual visitor’s behaviour.

Cookies that are strictly necessary for the operation of our website can be legally stored on your device. For all other types of cookies, we need your permission.

When you visit crd.org you can customize which cookies that you want to allow or refuse through the service Cookiebot, which regularly scans our website. Please note that refusal of a cookie may impair your experience. All cookies present on the website can be viewed in the consent form.

For reasons of transparency, we have listed the type of cookies used on our website below. Civil Rights Defenders uses five types of cookies which are stored for not more than two years or until such time as the visitor clears his or her browsing history:

- **Necessary:** Necessary cookies help make a website usable by enabling basic functions like page navigation and access to secure areas of the website. The website cannot function properly without these cookies.
- **Preferences:** Cookies that enable a website to remember information that changes the way the website behaves or looks, like your preferred language or the region that you are in. These can be refused.
- **Statistics:** Cookies that help website owners to understand how visitors interact with websites by collecting and reporting information anonymously. These can be refused.
- **Marketing:** Cookies that are used to track visitors across websites. The intention is to display ads that are relevant and engaging for the individual user. These can be refused.
- **Unclassified:** Unclassified cookies are cookies that we are in the process of classifying, together with the providers of individual cookies. These are automatically refused until they have been classified.

DATA SECURITY

In order to ensure that your personal data is secure with us, Civil Rights Defenders has implemented technical and organisational security measures in order to protect your personal data from, for example, unintentional erasure or impermissible access. These measures include firewalls, traceability, limitations on access and crisis management routines as well as organisational routines pertaining to the manner in which employees will act in their professional roles.

AMENDMENTS TO THIS INFORMATION

In the event we change how we process your personal data or use cookies, we will update this information as soon as possible and publish it once again. In the event the change is of considerable importance, we will contact you to notify you of such change.

CONTACT DETAILS

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

Civil Rights Defenders
Östgötagatan 90
SE-116 64 Stockholm
SWEDEN

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