

DEFENDERS' DATABASE 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).

Civil Rights Defenders is a non-profit politically and religiously independent non-governmental organisation, established in Sweden with registration number 802011-1442. The purpose of the organisation is to work for the compliance of fundamental civil and political rights in accordance with the Helsinki Final Act of 1975 and other international agreements concerning human rights.

The Defenders' Database ("Database") is a tool created and administrated by Civil Rights Defenders. The data accessible in the Database is provided by organisations that have entered into an agreement with Civil Rights Defenders allowing such organisations to upload data to the Database (each such organisation is hereinafter referred to as a "Database Partner").

Civil Rights Defenders may also itself upload data to the Database as a Database Partner. To the extent this is the case, references to Database Partners in this document is a reference to Civil Rights Defenders. Such personal data is not processed by Civil Rights Defenders as data processor, but as data controller (please see more on this under "Whose personal data is processed in the Database?").

The following Privacy Policy applies to the Database as available from time to time and explains how personal data is processed by Civil Rights Defenders.

WHOSE PERSONAL DATA IS PROCESSED IN THE DATABASE?

This Privacy Policy distinguishes between data that is processed by Civil Rights Defenders as data controller and data that is processed by Civil Rights Defenders on behalf of the Database Partners, i.e. as data processor.

Civil Rights Defenders is data controller of limited data about website visitors (for this data processing, please see Civil Rights Defenders' [Privacy Policy](#)) and each Database Partner's user accounts. When a Database Partner requests access to use the Database, Civil Rights Defenders collects the name, username, e-mail, organisation, phone number and country of residence of the individuals who will be using the Database for the Database Partner and stores the users' preferences in their profile (e.g. language and date format). This personal data is necessary for the provision of the Database.

Civil Rights Defenders is data processor of data collected by the Database Partner and uploaded to the Database (unless Civil Rights Defenders itself acts as a Database Partner and uploads the data to the Database, in which case Civil Rights Defenders is data controller for such data as well). Once an account is created and in use, Civil Rights Defenders processes the data reported to the Database, including personal data. This processing is governed by a personal data processing agreement between Civil Rights Defenders and the

Database Partner. When a Database Partner reports data in the Database, Civil Rights Defenders normally processes personal data about sources of information, victims, and witnesses. The personal data varies but is described in detail below. Please note that the Database Partner uploading the personal data is data controller for the processing of such personal data and is therefore e.g. responsible for ensuring the lawfulness of the processing, that any individual whose data is uploaded to the Database is duly informed and the overall compliance with the General Data Protection Regulation (GDPR), or other applicable legislation. Any questions regarding the processing of such personal data (i.e. if you are a source of information, victim or witness) should be addressed to the relevant Database Partner.

HOW IS THE DATA USED IN THE DATABASE?

Personal data that Civil Rights Defenders processes as data controller is used in aggregated ways to monitor usage and administer your use of the Database. Contact details and log-in credentials of users is also used to provide services, communicate updates, security alerts, support and to communicate with the Database community. Users can view their personal data stored in their profile and request Civil Rights Defenders to edit it. Personal data is never shared or sold to third parties (with the exception of approved sub-processors).

Civil Rights Defenders may use metadata (“data about the data” such as number of reported cases and statistics) of the personal data that Civil Rights Defenders processes on behalf of the Database Partners who are reporting human rights violations and incidents to the Database (i.e. which is processed by Civil Rights Defenders as data processor). Such information is always completely anonymous and does thus not constitute personal data. The Database Partners fully own their personal data and Civil Rights Defenders does not use, share, or sell that personal data.

WHY DATA IS PROCESSED, THE LEGAL BASIS FOR THE PROCESSING AND FOR HOW LONG THE DATA IS PROCESSED

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 set period of time. It is the data controller’s responsibility to ensure such purpose and legal basis and to determine for how long the personal data will be processed. Civil Rights Defenders will only use the 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 “storage period” column.

If you are a source of information, victim or witness whose personal data has been uploaded to the Database, Civil Rights Defenders processes this data as data processor. The data controller is the Database Partner uploading the personal data. If you would like to know the Database Partner’s purpose of the processing, legal basis or period of processing, please reach out to the Database Partner. Civil Rights Defenders, as data processor, is obliged to adhere to the Database Partner’s instructions and will process the personal data until the Database Partner instructs otherwise. In the “parties” column below, you can identify which personal data Civil Rights Defenders processes as data controller, and which personal data is processed as data processor.

To the extent Civil Rights Defenders acts as a Database Partner and processes data of sources of information, victims and witnesses as data controller, the purpose of the processing is to monitor the human rights situation to advocate for the respect of human rights and/or document and collect information regarding human rights violations to pursue legal action, support human rights investigations and demand accountability.

PARTIES	PROCESSING	STORAGE PERIOD
<p>Data Subject: User</p> <p>Data Controller: Civil Rights Defenders</p>	<p>The processing of your data is necessary for us to pursue our legitimate interest in providing the Database to you and remaining in contact with you (art. 6.1 (f) GDPR) which is also the purpose of the processing.</p>	<p>The personal data will be processed until the user account is erased or has been inactive for [24] months. Please note that this may not apply if Civil Rights Defenders is required to retain your personal data (partly or in full) under applicable mandatory law.</p>
<p>Data Subject: Source of information</p> <p>Data Controller: Database Partner</p>	<p>The following personal data is processed by Civil Rights Defenders: first name, last name, gender, date of birth or age, ethnicity, email, phone number(s), profession, ID number, place of residency and relationship to other data subjects. More information may be provided as determined by the Database Partner.</p> <p>It is the Database Partner's responsibility to identify its purpose of the processing and legal basis (e.g. consent). If the Database Partner is Civil Rights Defenders, the legal basis is consent.</p>	<p>The personal data will be processed until the Database Partner instructs Civil Rights Defenders to cease processing the personal data or the Database Partner's agreement with Civil Rights Defenders for use of the Database expires. If the Database Partner is Civil Rights Defenders, the personal data will be kept for as long as the monitoring or accountability project is on-going, or it has been inactive for 24 months.</p>
<p>Data Subject: Victim</p> <p>Data Controller: Database Partner</p>	<p>The following personal data is processed by Civil Rights Defenders: first name, last name, gender, date of birth or age, ethnicity, email, phone number(s), profession, ID number, place of residency and relationship to other data subjects. More information may</p>	<p>The personal data will be processed until the Database Partner instructs Civil Rights Defenders to cease processing the personal data or the Database Partner's agreement with Civil Rights Defenders for use of the Database expires. If the Database Partner is Civil Rights Defenders, the personal</p>

	<p>be provided as determined by the Database Partner.</p> <p>It is the Database Partner's responsibility to identify its purpose of the processing and legal basis (e.g. consent). If the Database Partner is Civil Rights Defenders, the legal basis is consent.</p>	<p>data will be kept for as long as the monitoring or accountability project is on-going, or it has been inactive for 24 months.</p>
<p>Data Subject: Witness</p> <p>Data Controller: Database Partner</p>	<p>The following personal data is processed by Civil Rights Defenders: first name, last name, gender, date of birth or age, ethnicity, email, phone number(s), profession, ID number, place of residency and relationship to other data subjects. More information may be provided as determined by the Database Partner.</p> <p>It is the Database Partner's responsibility to identify its purpose of the processing and legal basis (e.g. consent). If the Database Partner is Civil Rights Defenders, the legal basis is consent.</p>	<p>The personal data will be processed until the Database Partner instructs Civil Rights Defenders to cease processing the personal data or the Database Partner's agreement with Civil Rights Defenders for use of the Database expires. If the Database Partner is Civil Rights Defenders, the personal data will be kept for as long as the monitoring or accountability project is on-going, or it has been inactive for 24 months.</p>

WHO THE PERSONAL DATA IS SHARED WITH

Where Civil Rights Defenders processes your personal data as data controller, 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 software developers. 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 systems and storage services.

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).

To the extent Civil Rights Defenders is processing the personal data as data processor, other parties will only process the personal data if permitted under the personal data processing agreement with the Database Partner. Personal data uploaded to the Database is only visible to Civil Rights Defenders and for other users of the uploading Database Partner.

RIGHTS UNDER THE GDPR

In case your data is processed by Civil Rights Defenders as data controller and you have questions regarding Civil Rights Defenders' 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. If you contact Civil Rights Defenders with questions regarding personal data processed by Civil Rights Defenders as data processor, Civil Rights Defenders will refer you to the correct Database Partner if possible.

The following are your rights under the GDPR. Please note that the rights under 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 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.
- **Withdraw your consent** – You may at any time withdraw your consent, in which case Civil Rights Defenders will cease any processing of your personal data based on consent. Please note that this will not affect the lawfulness of the processing based on consent carried out prior to your withdrawal.

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

HOW WE PROTECT YOUR DATA

As the information uploaded to the Database might be of a highly sensitive nature, we employ high-end technical and organisational security measures to help protect your and all other personal data against loss and to guard against access by unauthorised persons. The security measures we have taken include implementing administrative security measures, physical security measures and electronic security measures. However, Civil Rights Defenders emphasises that no method of transmission over the Internet, or method of electronic storage, can be claimed to be completely secure.

Cloud Storage

The Database is a cloud-based solution which implies that all information is stored in a data centre and accessible from any location with internet.

Firewalls

The Database is protected by firewalls that provide network security by filtering incoming and outgoing network traffic.

Backups

The Database system, including database, application and file storage, is backed up daily.

Account Security

In order to access the Database, an account needs to be set up by which the Database Partner signs an agreement with Civil Rights Defenders. This allows the Database Partner to be provided with usernames and passwords for its users. It is the responsibility of the Database Partner (and its users) to make sure that the username and password combination does not get in the wrong hands. Each Database Partner and user can only access their own Database account.

Two-Factor Authentication (2FA)

Two-factor authentication refers to a username and password combination and a token device. Users can set up two-factor authentication in their user profiles. Civil Rights Defenders always recommends adding this extra security layer to all accounts.

CHANGES TO THE PRIVACY POLICY

Civil Rights Defenders may need to modify this Privacy Policy from time to time. If we make any changes to this Privacy Policy, we will notify you here on by a notice on our webpage so that you are aware of any changes with regards to the information we control and process.

CONTACT DETAILS

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