

PERSONAL DATA PRIVACY POLICY SUPPORTED INDIVIDUALS

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

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 a 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 organisation based in the European Union is mainly 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 organisations,
- (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 listed 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 applicant),
- (iv) When we provide capacity building activities,
- (v) When we provide legal advice or represent a client in a legal case, and
- (vi) When we write articles.

The personal data will generally contain your name and contact details. If you are a human rights defender, it will also include where you are located, which organisation and what objective you work for, and under what circumstances you are working (for example, if there is an immediate threat or the like). 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

(what is known as sensitive personal data) such as data relating to your political opinions, religious views, health, or sexual orientation, and that certain extra strict regulations apply to such personal data.

For participants in the Natalia Project, we collect the same information as well as 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 multiple designated devices at Civil Rights Defenders. If you have been listed as a contact person, in addition to your name and contact details, we may also gather information on your relationship to the individual in need.

We may additionally gather information from publicly accessible sources.

WHY WE PROCESS PERSONAL 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 hand column in the table below (“Storage Time”). 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	LEGAL BASIS	STORAGE TIME
<p>1. Human rights defenders. If you are a human rights defender, either at any of our partner organisations or as a partner yourself, we will process your personal data in order to work with you. 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 you, or if you are a supported individual).</p>	<p>The processing of your contact details is based on the grounds that the processing is necessary in order for us to be able to fulfil our legitimate interest in remaining in contact with you. With regard to other processing activities, please refer to those activities.</p>	<p>The personal data will be processed for as long as you are our partner or work for any of our partner organisations. Regarding storage time for specific types of processing, please refer to the respective categories below.</p>

<p>2. 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 to assess whether you should receive support and to provide you with such support. We may request that you to provide us with additional information, which could include personal data and sensitive personal information. During the time period in which we provide support to you, we may collect additional information (such as your geographic location if you participate in the Natalia Project) in order to be able to take action and support you in the best way possible, as well as ensure that our agreement with you can be fulfilled.</p>	<p>Our legal basis for this processing is that it is necessary for the performance of the contract with you, or in order to take certain actions at your request prior to such a contract. In the event we process sensitive personal data about you, one of the following legal grounds will apply:</p> <ul style="list-style-type: none"> • The processing relates to personal data that you have already clearly 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' organisation (art. 9.2 (d) of the GDPR). • The processing is necessary to protect your vital interests in situations you are physically or legally incapable of giving consent (art. 9.2 (c) of the GDPR). <p>If we need to process sensitive data about you and no other legal basis is applicable, we will obtain your explicit consent.</p>	<p>We will store your personal data for as long as you receive support or participate in the Natalia Project. After such time, your personal data is erased or anonymised within one year. In some cases, we may need to maintain your personal data for a longer period of time if it is necessary to fulfil the purposes of preventing fraud and abuse of support.</p>
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<p>3. Registering you as a contact person. Another individual, not yourself, who has requested support from us may have listed you as a contact person. We will need your personal data in order to contact you in an emergency situation.</p>	The processing is necessary for Civil Rights Defenders to fulfil its legitimate interest in having a contact person for the individual receiving support in emergency situations. You may at any time object to being a contact person by contacting us.	The personal data will be kept for the same time period as the data about the individual receiving support is kept, unless you object to our processing of your personal data.
<p>4. 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 subject of the training at hand. The purpose of the processing is to arrange the activities, but also be to handle related matters such as booking tickets for you.</p>	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 organisation, we will keep a record of which types of trainings and events you previously have attended.
<p>5. Publications specifically about you to promote your and/or our cause. If you are an individual receiving support from us, or someone who we would like to share information about, we may wish to write and publish articles, statements, short films, etc., specifically about you in order to promote your</p>	To the extent that our texts meet the exception for journalistic purposes (art. 85 GDPR and law (2018:218) with supplementary provisions to the EU data protection regulation) we will process personal data without restrictions.	We will process the personal data until consent is withdrawn. If data is processed based on a balancing of interests, we obtain consent as soon as there are practical conditions for this. General articles can, for journalistic purposes, be saved without time limit.

cause and/or promote our own work. Such materials may be published on our website, sent to our subscribers and others who receive our communications, be printed, or 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 support to you. We may also write general articles in which you are mentioned, including non-sensitive personal data and/or personal data made publicly available by you.

In other cases, the legal basis for the processing is that it is necessary for us to fulfil our legitimate interest in providing information about the human rights situation in the world. In cases where we process sensitive personal data about you, one of the following legal grounds will be applicable:

- The processing involves personal data that you have already made public in a clear way (Article 9.2 (e) of the GDPR)
- The processing is necessary to protect your fundamental interests in situations where you are physically or legally prevented from giving consent (Article 9.2 (c) of the GDPR).

In cases where we need to process sensitive personal data about you, such as images, videos, or information that you have specifically entrusted to us, and no other legal basis is applicable, we will obtain your express consent.

<p>6. Legal advice/other inquiries. If you ask us for legal advice or other support, we will process the personal data you share with us voluntarily.</p>	<p>The processing is necessary for us to be able to fulfil our agreement with you or to reply to your explicit request before entering into such an agreement (i.e., provide legal advice/other support on your matter).</p>	<p>The personal data will be processed during the time period in which we are working on your legal request. For requests that we are no longer working on, the personal data is erased or anonymised no later than April of the year after the request was received.</p>
<p>7. Legal representation. If we represent you in court or before a public authority, we will process your personal data. This primarily includes personal information about you and the circumstances of the case and may include sensitive personal information or information concerning violations of the law.</p> <p>When we represent a client in court proceedings, we need to process personal data within the framework of the legal case, for example, information about witnesses or the opposing party. In such situations, we may process your personal data in order to defend our client's legal position.</p>	<p>The processing is necessary in order for us to be able to fulfil our agreement with you (i.e., represent you in a legal case). In situations where we maintain sensitive personal information and/or information about convictions or violations of the law, the legal basis for doing so is that the data processing is necessary for the establishment, exercise, or defence of legal claims (art. 9.2 (f) GDPR and/or 5 § Regulation (2018: 219) complementing the GDPR).</p> <p>The processing of personal data belonging to an individual other than our client is necessary to address a matter of public interest, i.e., to defend our client's legal claims in court (Art. 6.1 (e) GDPR).</p>	<p>The personal data will be processed during the time that we work on your legal case and maintained thereafter for up to 10 years from the end of the case, unless there are specific reasons that justify a longer storage period.</p>

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 actors in order to provide you with the support you have requested and to assist you, for example, other organisations promoting human rights, banks, travel agencies, etc. In every such situation, we will limit the amount of data that we share to the extent possible and will only share data as permitted by law.

We may also need to give 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 carried out in line with the applicable data protection laws. Normally, transfers outside the EU/EEA will only occur when the transfer is necessary for the performance of the contract between you and us, and is therefore carried out on this legal basis. In certain cases, the transfer of data outside the EU/EEA may be done on another legal basis according to the GDPR. Such legal bases include (non-exhaustively) situations where the recipient resides in a country that the EU Commission views as ensuring an adequate level of protection, or where you have provided your explicit consent to the transfer, or where the transfer is based on the EU Commission's standard contractual clauses (provided that they are enforceable in the destination country).

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 noted 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 without your explicit consent to such a transfer. Please note, however, that we may publish such documentation on our website, which is accessible worldwide.

RIGHTS UNDER THE GDPR

In case you have any questions regarding Civil Rights Defenders' processing of your personal data, please contact us using the contact information at the bottom of this document. You may also use this contact information 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 and that an attempt to invoke any of the rights may not lead to any action being taken. 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 rectification of inaccurate personal data concerning you and to have incomplete personal data completed.
- **Right to erasure** – Under certain circumstances, you are entitled to have the personal data erased, in accordance with article 17 of the GDPR. This is the so-called "right to be forgotten".

- **Right to restriction of processing** – Under certain circumstances, you are entitled to restrict the processing of the personal data that Civil Rights Defenders carries out, in accordance with article 18 of the GDPR.
- **Right to data portability** – You are entitled to receive your 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, in accordance with article 20 of the GDPR.
- **Right to object** – In accordance with article 21 of the GDPR, you are entitled to object to specific instances in which Civil Rights Defenders processes your personal data, such as all processing of personal data based on Civil Rights Defenders' legitimate interests.

Finally, you also have the right to lodge a complaint with the supervisory authority, which in Sweden is the Swedish Authority for Privacy Protection (IMY).

DATA SECURITY

As the information we collect about you might be of a highly sensitive nature, we employ high-end technical and organisational security measures to help protect your personal data against loss and to guard against access by unauthorised 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.

CONTACT DETAILS

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

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