

# **PERSONAL DATA 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 which we do, for example, with regards to 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 responsible for the processing of personal data described below.

All processing of personal data and marketing that we conduct is done 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 a number of different situations, such as (i) when you make a donation to us or become a Civil Rights Defenders 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 identify you as a person of interest who we believe 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 you work for or represent. Depending on the purpose to be fulfilled, however, other personal data may be necessary, for example, 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 cases, we may also obtain information from publicly available sources.

In situations where we gather personal data directly from you, such as 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 inform you as to what information is necessary in order for us to be able to fulfil our part of the agreement, for example, to send a newsletter to you.

## **WHY WE PROCESS PERSONAL DATA, HOW LONG WE PROCESS IT FOR, AND OUR LEGAL BASIS FOR DOING SO**

The processing of personal data is permissible only where there is a specific purpose for doing so and a relevant 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 will never do so for any reason incompatible with

them. Furthermore, we will only process personal data for the period of time set forth in the right hand column in the table below ("Storage Time").

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 required by such laws.

| PROCESSING                                                                                                                                                                                                                                                                                                                                                                                                                                          | LEGAL BASIS                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | STORAGE TIME                                                                                                                                               |
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| 1. <b>Members.</b> 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.                                                                                                                                                                                                                                                                                | Processing is necessary in order for us to be able to fulfil our agreement with you (i.e., maintain the membership).                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           | We will process your personal data until you decide to terminate your membership. After that, we'll erase your personal data within 1 year.                |
| 2. <b>Donors.</b> If you make a regular (e.g., monthly) donation to Civil Rights Defenders or have made a donation to us at any point, you are registered with us in order for us to make it possible to process your payments, to maintain our relationship with you, and to send information to you regarding our operations, such as our annual report. We use services for address updates that involve processing your social security number. | <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 every month, for example), as well as our legitimate interest in collecting additional contributions for our activities. If you have donated on one or more separate occasions, all processing is based on our legitimate interest.</p> <p>Processing your social security number is necessary in order to fulfil our legitimate interest in keeping the information about you is up to date in our register and to collect additional contributions to our business.</p> | We retain your personal data for three years after you have made your last donation to us. However, you can unsubscribe from our mailing list at any time. |

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| <p>3. <b>Newsletter.</b> 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 that you have requested).</p>                                                                                                                                                                                                                                                                                                                                                                             | <p>We will retain your personal data until such time as you unsubscribe from our newsletter.</p>                                                                                                                                                                                                                                                                     |
| <p>4. <b>Events.</b> 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, for example, 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 obtain your express consent. If we take pictures or make recordings, we obtain consent from those who are visible during the event. As regards our subsequent processing, 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>Personal data that is processed with consent is retained until the consent is withdrawn.</p> <p>Other information will be processed 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 a period of not more than six months.</p> |
| <p>5. <b>Employees/trainees/consultants.</b> If you are employed at Civil Rights Defenders, have an internship, or carry out a consulting assignment, we will process your personal data.</p>                                                                                                | <p>The processing may be necessary for us to be able to comply with Swedish legislation, such as the Swedish Accounting Act (SFS 1999:1078), the Swedish Act on Limitation (SFS 1981:130) and the Annual Leave Act (1997:480).</p> <p>The processing may also be necessary for us to be able to fulfil our employment or consulting agreement with you.</p>                                                                                                                                                                    | <p>Personal data that we store with the purpose of complying with Swedish legislation will be processed for 7 years in accordance with the Swedish Accounting Act (SFS 1999:1078); for 10 years in accordance with the Swedish Act on Limitation (SFS 1981:130); and/or for two years in accordance with the Annual Leave Act (1997:480).</p>                        |

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|                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | <p>Under certain conditions, Civil Rights Defenders may process personal data after weighing interests, for example when processing name information on the intranet or in internal e-mail, processing in internal memos, etc.</p> | <p>Sensitive personal data pertaining to allergies may be processed on the basis of consent and will be deleted as soon as consent is withdrawn or when the employment has ended.</p> <p>Personal data that we process for the purpose of fulfilling our agreement with you or on the basis of legitimate interest will be deleted no later than 1 year after the employment has ended.</p> |
| <p>6. <b>CCTV surveillance at our Stockholm office.</b> We process personal data in the form of video recordings collected through CCTV cameras installed at our Stockholm office. The cameras do not record audio. The purpose of the surveillance is to maintain the safety and security of our staff, visitors, partners, and property. Only a limited number of authorised Civil Rights Defenders employees have access to the footage. Footage may be shared with external parties only when required, for example with law enforcement in connection with an incident.</p> | <p>This processing is necessary for us in order to fulfil our legitimate interest in ensuring the security of our premises and safeguarding individuals present in the office.</p>                                                 | <p>CCTV footage is kept for a limited period and is automatically deleted when no longer necessary for the purposes for which it was collected. Under normal circumstances, footage is not stored for longer than 30 days.</p>                                                                                                                                                              |
| <p>7. <b>Recruitment.</b> 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, and to some</p>                                                                                                                                                                                                                                                                                                                                                                                          | <p>The processing is necessary in order for us to be able to fulfil our agreement with you (i.e., process your application). To the extent that we use publicly available sources,</p>                                             | <p>We will delete your data no later than 6 months after the recruitment process has ended.</p>                                                                                                                                                                                                                                                                                             |

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| <p>extent personal data from publicly available sources, in order to determine whether to employ you.</p>                                                                                                                                                                                                                                                                                                                                                                                                       | <p>the processing is necessary for us to be able to satisfy our legitimate interest in collecting information relevant to the decision on employment.</p> |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
| <p>8. <b>Send-outs and contacts within the context of our fundraising activities.</b> 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 fundraise is by sending communications (e.g., emails, newsletters) and contacting individuals whom we regard as potential donors. This can include persons we have encountered through our activities and media monitoring, or who appear in registers we have ordered.</p> | <p>The processing is necessary for us to be able to fulfil our legitimate interest in collecting additional donations for our activities.</p>             | <p>In the event you appear in a register that we have ordered, or if you are an individual we consider to be 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 no more than three months following our first communication or contact. If you choose to make a donation to us, we will process your personal data in accordance with the above.</p> |
| <p>9. <b>Communications and contacts within the context of our advocacy work.</b> Our work involves contacting journalists, politicians, officials, and others we believe can contribute to strengthening human rights around the world. If you are in such a position, you may therefore 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 events in</p>   | <p>The processing is necessary in order for us to be able to fulfil our legitimate interest in conducting advocacy work for protecting human rights.</p>  | <p>We will retain your personal data for as long as we believe you should receive information and requests from us, or until such time as you state that you no longer wish to be contacted by us.</p>                                                                                                                                                                                                                                                                               |

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| <p>our work. We may adapt our send-out to you, for example depending on your profession or where you are geographically located. If you do not wish to receive our communications, you can object at any time.</p>                                                                                                                                                                                                                                                                                                                                                                                                                            |                                                                                                                                                                                                               |                                                                                                                                                                                                                                                                                                                                                                                                 |
| <p>10. <b>Contact persons for a supplier, partner organisation or another company or organisation.</b> 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 on 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 work together with your company or organisation and will delete your personal data within 1 year after such cooperation ceases.</p>                                                                                                                                                                                                      |
| <p>11. <b>Social media.</b> We have accounts on Facebook, Twitter, Instagram, LinkedIn, and YouTube. As soon as you interact with us, for example, by liking or sharing a post, writing a comment or message, or following our accounts, your personal data is processed.</p> <p>Sometimes we promote our posts on social media. When we do so, we may, with the help of the relevant platform, choose to target certain categories of people (e.g., people of certain ages or with certain interests that they themselves have indicated on their profile). We do not get access to any personal data, but the actual processing is done</p> | <p>The processing is necessary for us to fulfil our legitimate interest in communicating about our work and in communicating with you when you contact us to ask questions or participate in discussions.</p> | <p>If you leave a comment or make a post with criminal content in our social media channels, we may delete it. We also hide posts that contain personal attacks and spam. Remember that you as a social media user have primary control over the content you produce. You have the option to stop following us, delete your comments, hide updates from us in your feed, etc., at any time.</p> |

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| <p>by the provider of the social platform.</p> <p>Please note that Facebook, Twitter, Instagram, LinkedIn, and YouTube also process your personal data as data controllers. We have no control over how these platforms process your data.</p>                                                                                                                                                                                                                                                                                                                                                                                                                               |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
| <p><b>12. Human rights monitoring.</b> If partner organisations collect personal data on behalf of Civil Rights Defenders and such data is not anonymised before being transferred to us, Civil Rights Defenders will process personal data within the framework of our human rights monitoring activities. In such cases, Civil Rights Defenders is the data controller, and a data processing or assistance agreement is in place with the relevant partner organisation. The purpose of the processing is to conduct human rights monitoring, including documenting, analysing, and responding to human rights violations and threats against human rights defenders.</p> | <p>The processing is primarily based on your consent. Where it is not possible to obtain your consent, and depending on the circumstances of the individual case, the processing may be necessary in order to protect your vital interests or those of another person, or may be carried out as part of our legitimate activities as a non-profit organisation working to protect human rights.</p> <p>Where sensitive personal data (e.g. data concerning health, ethnic origin, political opinions or sexual orientation) is processed, this will take place only where you have given your explicit consent, where it is necessary to protect vital interests and you are unable to provide consent, where the information has been made public by you, or where the processing is necessary in connection with legal claims or judicial proceedings. The reason why the legal</p> | <p>We will process your personal data for as long as it is necessary for the monitoring of human rights in the specific case. Thereafter, your personal data will be erased or anonymised. Your personal data may also be deleted if you withdraw your consent or inform us that you no longer wish to cooperate with us, unless continued processing is required to comply with applicable legislation or to establish, exercise, or defend legal claims.</p> |

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|  | <p>basis for processing may vary is that Civil Rights Defenders conducts complex operations where it may be difficult to determine the basis for processing in advance without knowledge and understanding of the country and the type of activism that the individuals that Civil Rights Defenders monitors are engaged in.</p> |  |
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We also analyse visitor statistics and visitor behaviour on our website, but this is done through 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 those purposes. Normally, these third parties process personal data on our behalf of us as "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 done 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](mailto: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 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).

## COOKIES

This website uses cookies. 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. These statistics help us to 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](http://crd.org) you can customise 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 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 their 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

[info@crd.org](mailto:info@crd.org)  
+46 (0) 8 545 277 30

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