

# Choices Programme - Privacy policy (GDPR)

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## Scope

This privacy policy explains how we use any personal information we collect about you when you use this website and our wider services.

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## Glossary of Terms

### What is personal data?

Personal data relates to any information about a natural person that makes you identifiable which may include (but is not limited to):

- Names and contact information ie emails and telephone numbers
- E-mail addresses
- Employment history
- Employee numbers

### What is sensitive personal data?

Sensitive personal data refers to the above but includes genetic data and biometric data. For example:

- Medical conditions
- Religious or philosophical beliefs and political opinions
- Racial or ethnic origin
- Convictions
- Biometric data (e.g. photo in an electronic passport)

### **What is a Data Controller?**

For general data protection regulation purposes, the “data controller” means the person or organisation who decides the purposes for which and the way in which any personal data is processed.

The data controller is the Choices International Foundation.

### **What is a Data Processor?**

A “data processor” is a person or organisation which processes personal data for the controller.

### **What is Data Processing?**

Data processing is any operation or set of operations performed upon personal data, or sets of it, be it by automated systems or not. Examples of data processing explicitly listed in the text of the GDPR are: collection, recording, organising, structuring, storing, adapting, altering, retrieving, consulting, using, disclosing by transmission, disseminating or making available, aligning or combining, restricting, erasure or destruction.

## **What information do we collect about you and how?**

The Choices International Foundation, as a Data Controller, is bound by the requirements of the General Data Protection Regulations (GDPR).

We collect information about you when you fill in any of the forms on our website ie sending an enquiry, signing up for an event, filling in a survey, giving feedback etc. Website usage information is collected using cookies.

When submitting forms on our website we use a third-party software provider for automated data collection and processing purposes, they will not use your data for any purposes and will only hold the data in line with our policy on data retention. **Cookies** are text files put on your computer to collect standard internet log information and visitor behaviour information. This information is then used to track visitor use of the website and to create statistical reports on website activity.

#### Choices International Foundation cookies

This website uses web analytics service provided by Verdel ICT & Media. Cookies are used to help analyse how people use this website. The collected information, including your IP-address will be stored on servers in The Netherlands. We will use this information to generate reports on the website usage. We will only share the collected information with third parties when legally required to do so. Your IP-address will not be combined with that of other websites or other data sources that are available to us.

You can set your browser not to accept cookies and the above websites tell you how to remove cookies from your browser. Please note in a few cases some of our website features may not function because of this.

### **Internet Based Advertising**

We use LinkedIn and Twitter advertising services – e.g. social media buttons - and as such there are tracking codes installed on our website so that we can manage the effectiveness of these referrals. We do not store any personal data within this type of tracking.

## **How will we use the information about you and why?**

We collect information on our website to process your enquiry, deal with your event registration, give advice based on survey data and improve our services. If you agree, we will also use this information to share updates with you about our services which we believe may be of interest to you.

We will not share your information for marketing purposes with companies so that they may offer you their products and services.

## **Transferring your information outside of Europe**

As part of the services offered to you through this website, the information which you give to us may be transferred to countries outside the European Union (“EU”). For example, some of our members may be located outside of the EU. Where this is the case we will take steps to make sure the right security measures are taken so that your privacy rights continue to be protected as outlined in this policy. By submitting your personal data, you’re agreeing to this transfer, storing or processing.

If you use our services while you are outside the EU, your information may be transferred outside the EU to give you those services.

## **Security precautions in place about data collected**

When you give us personal information, we take steps to make sure that it’s treated securely.

Non-sensitive details (your email address etc.) are sent normally over the Internet, and this can never be guaranteed to be 100% secure. As a result, while we strive to protect your personal information, we cannot guarantee the security of any information you transmit to us, and you do so at your own risk. Once we receive your information, we make our best effort to ensure its security on our systems. Where we have given (or where you have chosen) a password which enables you to

access certain parts of our websites, you are responsible for keeping this password confidential. We ask you not to share your password with anyone.

## Profiling

We will not analyse your personal information to create a profile of your interests and preferences.

## Marketing

We would like to send you information about our services which may be of interest to you. If you have consented to receive our newsletter, you may opt out at any point as set out below.

You have a right at any time to stop us from contacting you. To opt out please email: [info@choicesprogramme.org](mailto:info@choicesprogramme.org).

## Access to your information, correction, portability and deletion

### *What is a Subject Access Request?*

This is your right to request a copy of the information that we hold about you. If you would like a copy of some or all your personal information, please email: [info@choicesprogramme.org](mailto:info@choicesprogramme.org). We will respond to your request within one month of receipt of the request.

We want to make sure your personal information is accurate and up to date. You may ask us to correct or remove information you think is inaccurate by emailing please email: [info@choicesprogramme.org](mailto:info@choicesprogramme.org).

### *Objections to processing of personal data*

It is your right to lodge an objection to the processing of your personal data if you feel the “ground relating to your particular situation” apply.

### *Data Portability*

It is also your right to receive the personal data which you have given to us, in a structured, commonly used and machine-readable format and have the right to transmit that data to another controller without delay from the current controller if:

- (a) The processing is based on consent or on a contract, and
- (b) The processing is carried out by automated means.

### *Your Right to be Forgotten*

Should you wish for us to completely delete all information that we hold about you please email: [info@choicesprogramme.org](mailto:info@choicesprogramme.org)

## Other websites

Our website contains links to other websites. This privacy policy only applies to this website so when you link to other websites you should read their own privacy policies.

## Complaints

If you feel that your personal data has been processed in a way that does not meet the GDPR, you have a specific right to lodge a complaint with the relevant supervisory authority. The supervisory authority will then tell you of the progress and outcome of your complaint.

## Changes to our Privacy Policy

We keep our privacy policy under regular review and we will place any updates on this web page. This privacy policy was last updated on 22 May 2018 and the Version number is 0.2 in line with the new GDPR guidelines.

## How to contact us

Please contact us if you have any questions about our privacy policy or information we hold about you:

- By email: [info@choicesprogramme.org](mailto:info@choicesprogramme.org)
- Or write us at:

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