

International Service for Human Rights

Data Privacy Policy

As at 25 May 2018

The International Service for Human Rights (ISHR) collects and processes your personal data that is provided by you and may obtain information identifying you, including email addresses, for the purpose of communicating with you. This Privacy Policy explains what that information is and how we use it.

1. Data protection principles

- a. ISHR is committed to processing data in accordance with its responsibilities, including under the EU General Data Protection Regulation (GDPR).

2. General provisions

- a. This policy applies to all personal data, set out in section 4 below, processed by ISHR.
- b. This policy shall be reviewed at least annually.

3. How we protect personal information

- a. ISHR understands that storing data in a secure manner is essential.
- b. ISHR stores personal data using reasonable physical, technical and administrative safeguards to secure data against foreseeable risks, such as unauthorised use, access, disclosure, destruction or modification.
- c. Access to personal data shall be limited to internal ISHR personnel.
- d. Although we make good faith efforts to store information we collect securely, we cannot guarantee the integrity and security of our network and systems, nor that our security measures will prevent third-party hackers from illegally obtaining this information.

4. Personal information

- a. This Privacy Policy applies to any data relating to a person where they are identified or from which they are identifiable, including:
 - i. Forename(s);
 - ii. Surname(s);
 - iii. Email address(es);
 - iv. Postal address;
 - v. Telephone number(s);
 - vi. Job title; and
 - vii. Employer.

5. Personal information: Data collection

- a. ISHR may collect information from different sources, including:

- i. Information provided directly to us when a person subscribes to our mailings;
- ii. Details provided off-line (e.g. business cards). Such details will only be used for the purpose for which they have been provided;
- iii. Non-identifying information, such as statistics on website usage and content viewed; and
- iv. Non-identifying information on the use of our mailings, such as opened emails and clicked-through links;

6. Personal information: Data processing

- a. We may use information collected to enable us to create mailing lists to send campaigning and marketing material, including:
 - v. ISHR's monthly monitor / newsletter containing press releases and articles on ISHR's work;
 - vi. Press releases;
 - vii. Open and private letters including specific advocacy calls promoting the aims and objectives of ISHR;
 - viii. Event invitations; and
 - ix. Fundraising appeals.

7. Your rights

- a. Any person has the right to opt out of receiving marketing communications through [this link](#) or the link at the bottom of each of our mailings. We will then delete the associated personal information promptly.
- b. Any person has the right to access their personal data and any such requests made to ISHR shall be dealt with in a timely manner.
- c. If any person wishes to raise a complaint on how we have handled their personal information, they can contact us and we will investigate the matter and respond promptly.

8. Lawful, fair and transparent processing

- a. To ensure its processing of data is lawful, fair and transparent, ISHR shall maintain a Register of Systems.
- b. The Register of Systems shall be reviewed at least annually.

9. Lawful purposes

- a. All data stored and processed by ISHR are done so on one of the following lawful bases:
 - i. consent;
 - ii. contract;
 - iii. legal obligation;

- iv. vital interests;
 - v. public task; or
 - vi. legitimate interests.
- c. ISHR will seek consent to store and process personal data through periodic emails, the first to be sent on 25 May 2018.
- d. When information is received by ISHR after 25 May 2018 pursuant to section 5 above, ISHR will seek consent to store and process personal data via email.

10. Lawful purposes: Legitimate Interest

- a. ISHR's legitimate interest is to promote and protect human rights by supporting human rights defenders, strengthening international human rights systems, and leading and participating in coalitions for human rights change for the previous.
- b. ISHR considers that in respect of the following categories it is within the legitimate interest of ISHR or those in the following categories to store and process their data:
 - i. United Nations experts;
 - ii. Regional human rights experts;
 - iii. Government representatives;
 - iv. Civil society representatives and human rights defenders; and
 - v. Media representatives.
- c. ISHR shall note the appropriate lawful basis corresponding to the data in the Register of Systems.

11. Data minimisation

- a. ISHR shall ensure that personal data stored and processed by ISHR are adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed.

12. Accuracy

- e. ISHR shall take reasonable steps to ensure personal data is accurate.
- f. Steps shall be put in place to ensure that personal data is kept up to date.

13. Archiving / removal

- a. To ensure that personal data is kept for no longer than necessary, ISHR shall review data it stores annually, at the time this Policy is reviewed.
- b. When personal data is deleted this should be done safely such that the data is irrecoverable.

14. Breach

- a. In the event of a breach of security leading to the accidental or unlawful destruction,

loss, alteration, unauthorised disclosure of, or access to, personal data, ISHR shall promptly assess the risk to people's rights and freedoms.

Contacting us about privacy concerns

Please do not hesitate to contact us if you have any questions about this Privacy Policy.

Contact us at: <mailto:information@ishr.ch>.