

PRIVACY NOTICE

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1. Introduction

We, meaning the International Network Against Cyber Hate (INACH), a foundation under Dutch law, are committed to respecting your privacy and complying with applicable data protection and privacy laws. This notice outlines how we collect and use your information.

This privacy notice will inform you as to how we look after your personal data when you visit our website, and tell you about your privacy rights and how the law protects you.

It is important that you read this privacy notice together with any other privacy notice or fair processing notice we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data.

This privacy notice supplements the other notices and is not intended to override them.

2. Controller

INACH is the data controller and is responsible for your personal data.

We have appointed a data privacy manager who is responsible for overseeing questions in relation to this privacy notice. If you have any questions about this privacy notice, including any requests to exercise your legal rights, please contact the data privacy manager using the details set out below.

3. The data we process about you

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

Below we list some of the most common categories of personal information we may collect about you:

Your contact details (including name, date of birth, title, address, telephone numbers and email addresses);

Financial information from any donors; this will include your payment details including your bank account details;

Your gender, university history, work experience, and referee details when applying to be a INACH volunteer or employee;

Any personal information you choose to give us when contacting INACH or when you complete any surveys, donation process and/or provide us with your views and opinions;

Sensitive personal information relating to health, criminal convictions or offences, race or ethnicity, for reporting incidents and/or to provide you with the necessary support when attending INACH sites and/or events;

Audio, video recordings, live stream footage and/or videography or other image(s) in connection with INACH's legitimate interests;

Other operational personal data created, obtained or otherwise processed in the course of carrying out our activities, including but not limited to, recordings of telephone conversations, logs of visitors, and logs of (online) incidents reported.

4. How is your personal data collected?

We use different methods to collect data from and about you including through:

Direct interactions. You may give us your personal data by filling in cyberhate report forms, volunteer applications or when making a donation, or by corresponding with us by post, phone, email or otherwise.

Third parties or publicly available sources. We may receive personal data about you from various third parties and public sources as set out below:

Financial and transaction data from providers of technical, payment and delivery services.

5. How we use your personal data

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Where we need to effectively respond to and deal with your query in the event that you contact us.
- Process your application form to attend an INACH event.

- Process and deliver your donation.
- Responding to and processing any cyberhate report that you make.
- Prevent and/or detect (online) crime.
- Monitor the safety of our volunteers, staff and contractors.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal or regulatory obligation.
- Any other processing for which you have given your consent, for example receiving marketing information or surveys.

Your relationship with us will determine why we collect particular information about you. We may be required by law to collect certain information; require it in order to perform a contract; or use it for our legitimate business interests where these do not override your rights or interests.

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

6. Who do we share your personal data with?

Your information will be processed by employees of INACH in order to fulfil our obligations to you as outlined in this notice. We may also share your details with third parties including:

- Contractors working on our behalf or in partnership with INACH;
- The Police, law enforcement or other regulatory bodies who can legally request access to information about you for prevention and detection of crime, and the apprehension or prosecution of offenders;
- Third-party service providers who perform functions on our behalf under contract, and who support our systems, operations and processes;
- Third parties to whom we may choose to sell, transfer, or merge parts of our organization or our assets. Alternatively, we may seek to acquire other organizations or merge with them. If a change happens to our organization, then the new owners may use your personal data in the same way as set out in this privacy notice.
- We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

7. Consent

Where we need your consent to hold your information we will ask you to confirm your consent in writing and we will inform you why we are collecting the information, how we will use it, how long we keep it for, who else will have access to it and what your rights are as a data subject.

Where we do rely on consent you have the right to change your mind and withdraw that consent at any time by writing to us. If you withdraw your consent we will immediately cease

using any personal information obtained and processed under that consent unless we have some other legal obligation to continue to use it.

8. How long will we keep your personal data

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements. For example, financial and statutory reporting requirements mean we must keep certain records for a period of 8 years.

In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

9. Your rights

To exercise your privacy rights please send your request in writing. We may be required to verify your identity for security purposes. Your rights are outlined below:

The right to access information we hold about you, why we have that information, who has access to the information and where we obtained the information from.

The right to correct and update the information we hold about you. If the data we hold about you is out of date, incomplete or incorrect you can inform us and your data will be updated.

The right to have your information erased. If you feel we should no longer be using your data you can request that we erase the data that we hold. Upon receiving a request for erasure we will confirm whether it has been deleted or a reason why it cannot be deleted (for example because we have a legal obligation to keep the information or we need it for a legitimate business interest).

The right to object to the processing of your data. You may request that we stop processing information about you. Upon receiving your request we will contact you and let you know if we are able to comply or if we have legitimate grounds to continue to process your data. Even after you exercise your right to object, we may continue to hold your data to comply with your other rights or bring or defend legal claims.

The right to data portability. You have the right to request that we transfer your data to another controller.

The right to request restriction of processing of your personal data. This enables you to ask us to suspend the processing of your personal data:

(a) if you want us to establish the data accuracy;

- (b) where our use of the data is unlawful but you do not want us to erase it;
- (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or
- (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

The right to withdraw consent at any time where we are relying on consent to process your personal data. We will comply with your request where it is feasible to do so, within 30 days of receiving your request. There are no fees or charges for the first request. However additional requests for the same data may be subject to an administrative fee of 25 per request. We may also charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it.

We may also contact you to ask you for further information in relation to your request to speed up our response.

To exercise your rights please write to: INACH, Tweede Rozendwarsstraat 22hs, 1016 PE Amsterdam, the Netherlands. Or email: secretariat@inach.net

10. International transfers

We do not transfer your personal data outside the European Economic Area (EEA) but our website is accessible from outside of the European Economic Area.

11. Data security

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, volunteers, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

12. Changes to the privacy notice and your duty to inform us of changes

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

13. Contact details and complaints procedure

Data Protection Officer:

Mr. Ronald Eissens

Email address: secretariat@inach.net

Tweede Rozendwarsstraat 22hs, 1016 PE Amsterdam, the Netherlands.

At INACH we aim to ensure all information collected about you is done so fairly and lawfully, whilst implementing appropriate measures to keep your information secure.

If you are not satisfied with the information provided in this notice, the Autoriteit Persoonsgegevens (AP), the Netherlands supervisory authority for data protection issues, <https://autoriteitpersoonsgegevens.nl/en>, can tell you what to do.

We would, however, appreciate the chance to deal with your concerns before you approach the AP, so please contact us in the first instance so we can resolve your queries or provide you with any additional information required.

14. Use of cookies

We do not use cookies on the INACH website or INACH related websites.

WEBSITE www.inach.net

FACEBOOK: INACH net and INACH Newsfeed

TWITTER: @INACHnet

YOUTUBE: INACH