

## **Introduction and general terms:**

The ICJ is committed to protecting personal data we obtain. This Privacy Policy sets out how and why we obtain, use and protect personal information if you interact with us.

This Privacy Policy relates to information which is obtained by ICJ and for which ICJ is the Data Controller. That is to say, data for which ICJ sets the purpose of the use as well as how this data will be used.

## **Why we hold and process personal data:**

We hold and process personal data for a number of reasons, including but not limited to:

- To keep a record of actions taken by our supporters and our communications with them.
- To send our supporters information about our projects, fundraising activities and appeals where we have their consent to do so.
- To claim any tax relief applicable on donations.
- To fulfil contractual obligations entered into with supporters.
- To keep people safe, including our staff and participants in events.
- To comply with legal obligations.
- To manage our organisation.
- To ensure we do not send unwanted information to supporters or members of the public who have informed us they do not wish to be contacted.

All data collected in our website will be processed, used and stored under the terms of applicable law, as established in the section below.

## **Explaining the applicable laws**

The new Federal Data Protection Act (nFDPA) is the applicable law on data protection for the ICJ and is the appropriate source for any of our website users to verify their rights when using our website. This law sets out a number of different reasons for organisations to collect and process your personal data: when collecting your personal data, we will make clear what data is necessary for a particular purpose.

The ICJ relies on the following legal bases in our marketing activities:

### **Consent**

Wherever applicable and possible, we will ask for your consent to send you marketing information. We will do this through a clear statement of what you will receive and allow you to select only those channels that you wish to hear from us by.

## **Legitimate interest**

In specific situations, we process your data to pursue our legitimate interests in ways which might reasonably be expected and which do not materially impact your rights, freedom or interests. The ICJ's use of legitimate interest includes the following:

Sending direct marketing information via email, to keep our supporters updated on the ICJ's projects, fundraising activities and appeals. We will only do this where we have reason to believe that this information will be of interest and there will be the option to unsubscribe from future correspondence.

For activities other than marketing, we may rely on different legal bases:

## **Legal compliance**

If the law requires us to, we may need to collect and process your data. We will also be legally required to store information and personal data for a limited amount of time, as established by applicable law.

## **Public Interest**

In limited situations we may use data in the public interest. It is likely to be in the public interest to collect data to prevent illegal practices, ensure that we are fair in our practices by carrying out equality and diversity monitoring, or safeguard the wellbeing of people with whom we work.

## **When we collect your information**

Below are some of the circumstances under which the ICJ may collect your personal information:

### **1. When you give it to us DIRECTLY**

You may give us your personal data directly when you make a donation, sign up for one of our events or to receive our newsletter, download resources from the ICJ, or otherwise communicate with us.

### **2. When you give it to us INDIRECTLY**

You may give us your information indirectly when you sign up to events organised by associated third parties, such as our partners or funders. These independent third parties may pass your data to the ICJ where you have indicated that you wish to learn more about us, or offered your consent to hearing from us (where applicable).

Sometimes your personal data is collected by an organisation we are partnering with, or that is working with us. In some of these circumstances, we may still be the "data controller", responsible for the security and proper processing of that data.

### 3. When you access ICJ's Social Media

We might also obtain your personal data through your use of social media such as Facebook, Twitter or LinkedIn, depending on your settings or the privacy policies of these social media and messaging services. To change your settings on these services, please refer to their privacy notices, which will tell you how to do this.

<https://www.facebook.com/policy.php>

<https://twitter.com/en/privacy>

<https://www.linkedin.com/legal/privacy-policy>

### 4. When the information is publicly available

We might also obtain personal data about individuals who may be interested in giving major gifts to charities or organisations like the ICJ. In this scenario, the ICJ may be looking to learn more about these individuals, their interests and motivations for giving through publicly available information. This information may include newspaper or other media coverage, open postings on social media sites such as LinkedIn, and other publicly available data.

We may also gather information if your activities relate to our work – for instance, if you are a public figure, or you represent an organisation with which we work.

### 5. When we use cookies

Cookies are a useful way for us to understand how our website is used. When you visit our website we will collect data from your computer or other device such as a smartphone or tablet through the use of “cookies”. For information on the types of cookies we use, how we use them and how you can control your cookie preferences, see the ICJ's cookie policy below.

If you visit our website as an anonymous visitor (e.g. you switch off cookies), the ICJ may still collect certain information from your browser, such as the IP address (an IP address is a number that can uniquely identify a computer or other internet device).

#### **What information the ICJ collects about you**

We only collect personal data relevant to the type of transactions or interaction you have with the ICJ.

Whatever your interaction with us this information will be minimal and linked to the purpose for which we need it.

For example, **when you contact the ICJ** to make an inquiry or sign up to any of our activities or online content or you telephone, email, write to us, or engage with us via social media channels, we may receive and retain your personal information. In these cases the details and information we are likely to process are your name, email address, postal address, telephone or mobile number. Other information may also be stored and

collected with your prior knowledge and consent. If you **participate in an event** we may (with your permission) take your photograph or video, or interview you.

If you **participate in other events and some of our research**, we may ask you questions regarding your experience with us, or conduct other survey questions relating to your experience.

Where we gather information about you which is **publicly available** – for instance as a **prospective supporter** – this may include your name, contact details, views and positions you have expressed, and details regarding your circumstances – for instance which political roles you hold or what your background is.

## Sensitive Personal Data

We only collect “sensitive personal data” where there is a clear and specific reason for doing so. For example, if you apply for a role with us, we may collect this data for equality monitoring. Further details regarding this are provided to all candidates and prospective employees during the applicable stages of their recruitment process and are outlined in our recruitment and selection policy.

Rarely, we may collect this data for the prevention of crime or dishonesty, to safeguard those with whom we work, or for another reason which is in the public interest. Where we do this we will do it carefully and in accordance with applicable laws.

All sensitive personal data is stored on a secure database, will only be used and processed in observance with applicable legal requirements, and to which only a limited number of relevant staff have access. Sensitive data will be deleted when no longer relevant, unless applicable law requires us to store it for a specific period of time, is never shared with third parties, and while under our possession and control, will be available to you at any point should you wish to see it.

## How we use your personal data

The ICJ will use your personal information for the following purposes:

1. **For administrative reasons**, including:
  2. “service administration”, which means that the ICJ may contact you for reasons related to administering any donations you have made, your tax status with regard to tax benefits available, the completion of commercial or other transactions you have entered into with the ICJ or the activity or online content you have signed up for;
  3. to confirm receipt of donations (unless you have asked us not to do this), and to say thank you. In relation to correspondence you have entered into with us whether by letter, email, text, social media, message board or any other means, and to contact you about any content you provide;
- for internal record keeping so as to keep a record of your relationship with us;
  - to keep your data up to date, and to ensure that we can maintain contact with you where we believe you are happy to be contacted;

- to implement any instructions you give us to with regard to withdrawing consent to send communications;
  - to use IP addresses to identify the location of users, to block disruptive use and to establish the number of visits from different countries;
  - to protect our staff and those with whom we work, or to prevent illegal practices. This will involve frequent fraud and anti-terrorism screening of employees and partners.
2. **For marketing reasons**

Sending direct marketing information via email by post or telephone, to keep our supporters updated on the ICJ's projects, fundraising activities and appeals. We will only do this where we have reason to believe that this information will be of interest and will include the option to unsubscribe from future correspondence. Sending direct marketing information via email by post or telephone, to keep our supporters updated on the ICJ's projects, fundraising activities and appeals. We will only do this where we have reason to believe that this information will be of interest and will include the option to unsubscribe from future correspondence.

3. **For market research**

- to invite you to participate in surveys or research about the ICJ or our work (participation is always voluntary);
- to analyse and improve the activities and content offered by the ICJ website to provide you with the most user-friendly navigation experience. We may also use and disclose information in aggregate (so that no individuals are identified) for marketing and strategic development purposes.

### **Sharing personal information**

The ICJ will only use your information within the organisation, and exclusively for the purposes for said information was obtained. Your personal data will not, under any circumstances, be shared or sold to any third party for their own marketing purposes, and you will not receive marketing from any other companies, charities or other organisations as a result of giving your details to us.

We may need to share your information with service providers who help us to deliver our projects, events, or other specific activities. These "data processors" will only act under our instruction and are subject to pre-contract scrutiny and contractual obligations containing strict data protection clauses. We do not allow these organisations to use your data for their own purposes or disclose it to other third parties without our consent and we will take all reasonable care to ensure that they keep your data secure.

### **Legal Compliance**

We will also comply with legal requests where disclosure is required or permitted by law (for example to government bodies, statutory bodies, or law enforcement agencies for tax purposes, where it is in the public interest, or the prevention and detection of crime, subject to appropriate protection in law).

The ICJ may transfer your personal data outside the EEA. If it does so, this may occur under the protections of the European Commission's standard contractual clauses, but will otherwise only take place where appropriate standards and safeguards are in place.

## **How long do we store personal information?**

The ICJ will hold your personal information on our systems for as long as is necessary for the relevant activity, and in accordance with the requirements in applicable law.

If you request that we stop sending you marketing materials we will keep a record of your contact details and appropriate information to enable us to comply with your request not to be contacted by us.

## **How we keep your data safe:**

We undertake regular reviews of who has access to information and take the necessary steps to ensure that your information is only accessible to a very select number of relevant staff.

## **Your rights over personal data:**

You have a variety of rights in respect of your data, including the rights to see, update, restrict, object to the use of or withdraw use of your data. In particular, depending upon why we hold your data, you may have the right to request:

- Access to the personal data we hold about you, including how we first obtained your details, free of charge in most cases
- The correction of your personal data when incorrect, out of date or incomplete.
- That we stop using your personal data for marketing purposes, if applicable.
- That we remove your personal data from our systems (known as the "Right to be Forgotten"), where legally applicable and permissible.

You can contact us to request to exercise these rights at any time. Please see details on how to get in touch with us on "Contact Us", below.

## **Opting out of Direct marketing**

You have the right to stop the use of your personal data for direct marketing activity through all channels, or selected channels. We will always comply with your request.

Where we are sending you direct marketing on the basis of our legitimate interest, you can also ask us to stop. Where we send email marketing on a soft opt in basis we will also comply with all requests to opt out.

## **Right to be Forgotten**

Upon request we will remove your personal data from our systems, to the extent that we are permitted to by law or regulatory guidelines. Where we are required to retain financial data for a number of years for audit purposes, and we will not be able to delete relevant details until this time period has elapsed.

## **Subject Access Requests**

You have the right to request a copy of the personal information we hold about you. We will provide this as soon as possible, unless there are specific reasons why this would not be possible. We will always let you know if this is likely to be the case. We will only withhold requested personal information from the Data Owner if legally required to do so.

## **Checking your identity**

To protect the confidentiality of your information, we will ask you to verify your identity before proceeding with any request you make under this Privacy Notice.

If you have authorised a third party to submit a request on your behalf, we will ask them to prove they have your permission to act.

The accuracy of your information is important to us. We would like to ensure we are able to communicate with you in ways that you are comfortable with. If you would like more information, to update your details or have any questions about this policy, please email us at: [info@icj.org](mailto:info@icj.org)

## **Changes to our Privacy Policy**

This Privacy Policy may be updated from time to time, so it is advisable to check it whenever you submit personal information to the ICJ. It is also subject to applicable law, especially the FDPA, and shall remain compliant to its terms at all times. The date of the most recent revisions will appear on this page. If you do not agree to these changes, please do not continue to use the ICJ website, to submit personal information to the ICJ. If material changes are made to the Privacy Policy we will notify you by placing a prominent notice on the website.

## **Cookie policy**

We use cookies to allow us to improve our site. By continuing to browse the site, you are agreeing to our use of cookies.

A cookie is a small file of letters and numbers. Cookies contain information that is transferred to your computer's hard drive.

We use cookies to recognise and count the number of visitors, and to see how visitors move around our website when they are using it. This helps us to improve the way our

# Privacy Policy



website works, for example, by ensuring that users are finding what they are looking for easily.

You can block cookies by activating the setting on your browser that allows you to refuse the setting of all or some cookies.