

PRIVACY AND COOKIE POLICY MEMBERSPACE
SOROPTIMIST INTERNATIONAL OF EUROPE
(JULY 2018)

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I. INTRODUCTION

1. This Privacy and Cookie Policy (hereinafter **“Policy”**) explains how Soroptimist International of Europe (hereinafter ‘SIE’), collects, uses and processes personal data related to its Members, Project Contact Persons and Project Sponsors (hereinafter **“You”**).

Personal data (hereinafter **“data”**) contains any information relating to you as a natural person – even when there can only be indirect identification.

2. SIE cares about the protection of your privacy. SIE therefore treats and protects your data in a lawful, adequate and transparent manner.

The collection and processing of personal data are governed by strict conditions, enforced by the law. While processing your data, SIE acts in accordance with the EU’s General Data Protection Regulation 2016/679 of 27 April 2016 concerning the protection of personal data (known as **“GDPR”**), or any amendment to them. More information concerning data protection can be obtained at the local Data Protection Authority or at the Swiss Federal Data Protection and Information Commissioner.

3. SIE kindly invites you to read this policy carefully in order to fully understand the way SIE handles your personal data.
4. Creating an account implies your explicit acceptance (by sharing your data, or by opt-in) of this Policy, meaning that you agree with the way SIE processes your personal data.
5. This Policy can be updated from time to time. The most recent version of the Policy will be available on the Member Area. You will be informed through the normal means of communication when significant changes have been made.

II. WHO IS THE DATA CONTROLLER?

1. SIE takes responsibility of your personal data as a “**data controller**”. The specific company data are the following:

Soroptimist International of Europe

72, route de Florissant

1206 Geneva, Switzerland

Telephone: +41 (0)22 346 08 80

E-mail: siehq@soroptimisteurope.org

2. SIE is therefore your interlocutor and accountable to pass on your data to the competent authorities.
3. SIE can rely upon specialized service providers to process your personal data on behalf of SIE in accordance with this Policy. Only those data which are clearly requires will be given to these companies (hereinafter: ‘**Processors of SIE**’).

III. WHICH CATEGORIES OF DATA ARE PROCESSED BY SIE?

1. SIE can process data and information that have been issued by you, by local clubs or provided by third parties, insofar as these are necessary or useful for the functioning of SIE.

In order to inform you as best as possible, this Policy contains an overview of the categories of personal data that can be processed (this overview is not exhaustive; other kinds of personal data can be processed if necessary). The context in which personal data are collected or processed will be given in this overview. This overview should be read together with the description of the purposes for which SIE processes personal data.

Category	Examples	Context
1/ Member Information	First and last name, contact language, function, club location, profession, e-mail address, nationality, (mobile) phone-number	These are the requested member data provided by you when making an account.
2/ Project Contact Details	Name and e-mail address Project Contact Person	These are the requested project data when adding a Program Focus Report.
3/ (third party) Project Sponsors Details	(Company) Name, address, e-mail address.	These can be provided when adding a Program Focus Report.
4/ Cookies	Data on clicking and viewing behaviour of the user, devices of the user, IP-address, type of internet browser, type operating system or preferences.	This information is gathered by means of cookies. More on cookies in Article IX.

2. SIE does not process data that reveal race or ethnic background, or political beliefs, religious beliefs, membership of a trade union, sexual orientation, genetic or biometric data or medical data, unless the name of a partner is given when signing up for an event.

IV. FOR WHICH PURPOSES DOES SIE PROCESS YOUR PERSONAL DATA?

1. SIE collects and processes your personal information for the following purposes. SIE makes sure that only data necessary and relevant for these purposes are processed.

Category	Processing Purposes
1/ Member Information	Member information is used to enable you to use your account on our website after it has been verified at the local club and for networking between the members of SIE who are able to see your contact details, for the purposes of executing the contract.
2/ Project Contact Details	Project Contact Details are used for internal registration of the projects for the purposes of executing the contract.
3/ (third party) Project Sponsor Details	(third party) Project Sponsor details are used for the purpose of internal registration of the projects for the purposes of executing the contract.
4/ Cookies	<i>Infra</i> Article IX.

2. SIE may process your personal electronic contact information (i.e. your e-mail address) to send you information via newsletters. In this case, SIE first asks for your specific permission.

V. WITH WHOM DOES SIE SHARE YOUR PERSONAL DATA?

1. SIE handles your data with the utmost care and will not disclose your data to third parties, unless necessary for the performance of its assignment or to optimize the service of SIE.
2. For the aforementioned purposes, SIE can disclose your personal data to the following receivers:
 - Third parties who assist SIE in the execution, management and control of its activities and services, for example with the online support through IT security and infrastructure of SIE.

These third parties may only use the data for the aforementioned purposes. Any other use is not included and is forbidden. These third parties are contractually obliged to only use your data according to the provisions of this Policy.

3. SIE will never provide your personal data to other third parties, unless there is prior permission and SIE entered into a contract with this third party containing guarantees concerning the protections of your data.

4. Furthermore it is possible that, if obliged to do so on the basis of a statutory provision or court order, SIE will disclose your data to the competent authorities.
5. In the context of these exceptions, SIE shall attempt to inform you prior to the transfer of data. However, because of technical, juridical or commercial reasons, this cannot be guaranteed.
6. SIE stores your personal data within the EEA, in France.

VI. HOW LONG WILL SIE HOLD YOUR DATA?

Data will be stored and processed for the period obligated or justified by law or another legal requirement. If this period is shorter than necessary for the aforementioned purposes, SIE will use the following periods:

Category	Duration of processing
1/ Member Information	Member Information is stored for the duration of the membership and a subsequent duration of 10 years
2/ Project Contact Details	Project Contact Details are stored for the duration of the project and the subsequent 10 years.
3/ (third party) Project Sponsor Details	(third party) Project Sponsor Details are stored for the duration of the project and the subsequent 5 years
4/ Cookies	<i>Infra</i> Article IX.

VII. SECURITY OF PERSONAL DATA

1. SIE applies strict standards to protect the personal data under its control against unauthorized or unlawful processing and against unintentional loss, destruction or damage.
2. SIE therefore takes technical and organizational measures such as firewalls, SSL certificate and IP restriction, to prevent and detect inappropriate access, loss or disclosure of your personal data.
3. In the unlikely and unfortunate case that your personal data under the control of SIE are compromised by a breach of information security, SIE will immediately act to identify the cause of such breach and take action through appropriate remedial measures. If necessary, SIE will inform you, as well as the competent data protection authority, of this incident in accordance with the applicable legislation.
4. In order to process your personal data, we grant access to your personal data to our employees. We guarantee a similar level of protection by making contractual obligations enforceable against the employees and/or appointees. These obligations are similar to those of this Policy.

VIII. YOUR RIGHTS AS A DATA SUBJECT

1. RIGHT OF ACCESS, RECTIFICATION, ERASURE, PORTABILITY OF DATA AND RIGHT TO OBJECT

1. For the purposes mentioned above you have:

- **Right of access** to your personal data. This means that you can ask SIE whether it processes your personal data, for what purposes these data are processed, which categories of data are processed, and to whom they are communicated.
- **A right to rectification** if you think your personal details are incorrect or incomplete.
- **A right to erase** your personal data. At the end of the contract that you have concluded with SIE, you have the right to ask us to stop using your data. SIE may, however, in the context of this declaration, keep track of the personal data required for the purpose of proof of transactions. Under this right to erase, you also have the right to ask SIE at any time to stop using your personal data that are being processed on the basis of your permission or the legitimate interest of SIE. Due to its legitimate interests, SIE can still process your personal data after balancing your interests with that of SIE, unless you decide to terminate the relationship with SIE;
- **A right of portability of data** that you have provided to SIE if your personal data are processed based on an agreement or on the basis of your permission to send electronic communications and these personal data are processed by means of automated processes. Under this right you can ask SIE to send your own personal data to yourself or to another data processing officer, as far as this is technically possible for SIE.
- You have **the right to object** to the processing of your data for the purposes stated in Article IV.4. In this event, SIE will stop processing your personal data, unless SIE invokes compelling, justified and heavier weighing grounds for processing that outweigh your interests, rights and freedoms, or for instituting, exercising or substantiating a legal claim.

2. EXERCISE OF YOUR RIGHTS

1. You can exercise your rights by sending a written request by mail, which is dated, signed and attached with a copy of your identity card (only the front) to privacy@soroptimisteurope.org or via the contact form on our website.
2. You can also submit a complaint to the Swiss Federal Data Protection and Information Commissioner, by post to Feldeggweg 1, CH-3003 Berne, Switzerland by e-mail to info@edoeb.admin.ch by telephone to +41 (0)58 462 43 95

Or to your local European Data Protection Authority.

IX. COOKIES

1. What is a cookie?

A “cookie” is a small text file that is sent from the server of SIE and is stored on your computer’s hard drive. This way we can remember your preferences when visiting our Website. The information stored through these cookies can only be read by SIE and only for the duration of your visit to the website.

2. Why do we use cookies?

Our website primarily uses cookies and similar technologies to enhance the surfing experience on our website. All data SIE retrieves from their cookies are only used to distinguish your preferences from those of the other users of our website. This allows us to offer you a better experience when you visit our website and to optimize our website.

As a result of recent amendments to the law, all websites focusing on certain parts of the European Union are obligated to ask for your permission to use or save cookies and similar technologies on your computer or mobile devices. This Policy clearly and completely informs you about the cookies we use and their purpose.

3. Kind of cookies:

Cookies can be subdivided based on their offspring, function and durability.

Our website only uses the following cookies:

Functionality cookies

Name	Function
Authentication cookies 'Remember me'	Identification of the website user.
Language Display cookies	Stores a language preference for the website

4. For cookies set by third parties (Google Analytics) we kindly refer you to the statements provided by these parties on their respective websites. Please note that we do not have any influence on the content of these statements nor on the content of the cookies of these third parties:

5. Your permission:

When you first visit our website, you express your implicit approval to accept our different kinds of cookies.

You can block cookies by activating your browser settings which allows you to refuse the cookies. The rejection of these cookies may have the effect of not allowing you to use some functionalities of the website.

X. APPLICABLE LAW AND JURISDICTION

1. GDPR applies to this Policy, unless Swiss law offers more protection. Any disputes arising from this Policy or otherwise related to this website and/or any of the services provided by SIE will be submitted to the competent court of Geneva.

XI. QUESTIONS OR REQUESTS?

If you have any questions or requests about this Policy, please contact:

Soroptimist International of Europe
72, route de Florissant
1206 Geneva, Switzerland
Telephone: +41 (0)22 346 08 80
E-mail: siehq@soroptimisteurope.org