

# Privacy and Cookie Policy

## Introduction

This Privacy and Cookie Policy (hereinafter "**Policy**") explains how Soroptimist International of Europe (hereinafter "**SIE**"), collects, uses and processes personal data related to:

- the users of soroptimisteurope.org (hereinafter "**Website**"); and
- those who make use of other SIE services, whether or not online, which includes contacting SIE via the contact form on the Website, e-mail, telephone or other means of communication (hereinafter "**You**").

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

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 Data are governed by strict conditions, enforced by the law. While processing your Data, SIE acts in accordance with Federal Act on Data Protection ("**FADP**"), the Ordinance to the Federal Act on Data Protection ("**OFADP**"), the Telecommunications Act ("**TCA**") and other applicable data protection provisions of Swiss and international law, in particular where applicable 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 on the website of your local Data Protection Authority or the Swiss Federal Data Protection and Information Commissioner.

SIE kindly invites you to read this Policy carefully in order to fully understand the way SIE handles your personal Data.

This Policy can be updated from time to time. The most recent version of the Policy will be available on the Website. This page was last modified on [01.06.2021].

## Who is responsible for operating the Website and providing SIE services?

SIE operates the Website and is responsible for collecting, processing and using your Data in compliance with the applicable data protection law. If you have any questions regarding data protection, you can get in touch with us at the following address:

Soroptimist International of Europe

72, route de Florissant

1206 Geneva, Switzerland

Telephone: +41 (0)22 346 08 80

E-mail: [siehq@soroptimisteurope.org](mailto:siehq@soroptimisteurope.org)

SIE may rely upon specialized service providers to process your personal Data on behalf of or together with SIE in accordance with this Policy. Only those Data, which are necessary for the processing activity, will be given to these service providers (hereinafter: "**SIE Service Providers**").

## Which categories of Data are processed by SIE?

SIE may process Data and information that have been provided by you, by local clubs or by third parties. Such Data is only being processed lawfully, transparently, for a specific purpose, proportionately, in good faith and limited to what is necessary for the functioning of SIE.

In order to inform you as best as possible, this Policy contains an overview of the categories of Data that may be processed (this overview is not exhaustive; other kinds of Data may be processed if necessary). The context in which 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 Data.

Category	Examples	Collection Point	Storage Location
1/ Website Visitor Data	IP address, page view, time on the Website, used device, referrer URL	This information is gathered when making use of our Website.	Switzerland
2/ Contact Details	Name, e-mail address, telephone number	These data can be provided by you when contacting us via e-mail, the contact form on our Website or by post.	Switzerland
3/ Job Applicants Details	Name, e-mail address, nationality, work experience, address, telephone number	The applicant's details are provided by you and kept by saving your CV.	Switzerland
4/ Sponsor Details	(Company) name, address, telephone number	These data can be provided by you when a donation is made.	Switzerland
5/ Social Media Data	Your LinkedIn profile, statistical data, the content of the messages you send to us through Facebook	These data are collected when you interact with us via social media (e.g. like our Facebook page or post or send us a message through LinkedIn).	Switzerland, EEA or USA
7/ Cookies	Data that you are clicking on and tracking of the users behaviour, 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 below.	Switzerland

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.

### For which purposes does SIE process your Data?

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	Legal Basis
1/ Website Visitor Data	Inclusion of Data in anonymous statistics for internal use, from which the identity of specific persons or companies cannot be ascertained.	It is within SIEs legitimate interest to process such data to establish a connection, to offer a secure and well-functioning website as well as to continually improve its Website and services.

2/ Contact Details	Contact details are used to answer and reply to your e-mails, calls and letters and provide you requested information for the purposes of executing the contract.	We process such Data either with your consent or to conclude a contract with you.
3/ Job Applicant Details	Job applicant details are used for the purposes of assessing a candidacy for current or future recruitment.	We process such Data either with your consent or to conclude a contract with you.
4/ Sponsor Details	Sponsor details are used for the purpose of fundraising.	We process such Data either with your consent or to conclude a contract with you. Furthermore, it is within our legitimate interest to raise funds and interact with existing or future sponsors to finance our cause.
5/ Social Media Data	Information we collect from our social media channels in order to follow up on any messages or requests directed to us.	It is within our legitimate interest to process statistical data for improving our services.  Relating to messages or other requests sent by you, we process such Data within our legitimate interest to provide answers and being transparent about our activities.
7/ Cookies	<i>Cf. Section about cookies.</i>	It is within our legitimate interest to process such Data for improving our services and Website.

SIE may process your personal electronic contact information (i.e. your e-mail address) to send you information via newsletters if you are a member. In this case, SIE assumes your implicit consent to receiving such newsletters because of you being a member of SIE. You can unsubscribe from our newsletter at any time via a link in each respective e-mail. Please, note that to send you the newsletter in a professional manner, we use the services of Mailchimp, which is an American marketing automation platform and email marketing service belonging to the Rocket Science Group LLC. They may collect information about your device or interaction with us. We cannot influence what data Mailchimp processes. Therefore, we recommend that you check its privacy policy.

**With whom does SIE share your Data?**

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.

For the aforementioned purposes, SIE may disclose your Data to the following receivers:

- SIE members or SIE clubs who request and share their data with the SIE headquarter both online and offline to fulfil its services. This also includes the disclosure of the data base on the extranet as well as the processing of the data included in the data base (e.g. updating contact details). Such information will only be shared internally within the Soroptimist organisation. For example, if an SIE member sends a request to the SIE headquarter asking for the contact details of another SIE member or club, the SIE headquarter will disclose such data for the purpose of enabling communication between the members or clubs.

- SIE Service Providers who assist SIE in the execution, management and control of its activities and services, for example with the IT security and infrastructure of SIE.

These SIE Service Providers may only use the Data for the aforementioned purposes. Any other use is not included and is forbidden. These third parties are contractual obliged to only use your Data according to the provisions of this Policy. Moreover, SIE enters into data processing agreements with SIE Service Providers containing the aforementioned contractual guarantees concerning the protection of your Data to ensure an adequate level of data protection

SIE will not provide your Data to other third parties, unless you consent to such disclosure..

Furthermore, it is possible that, if required to do so on the basis of a statutory provision or court order, SIE will disclose your Data to the competent authorities.

In the context of these exceptions, SIE attempts to inform you prior to the transfer of Data. However, because of technical, juridical or commercial reasons, this cannot be guaranteed.

### How long will SIE keep your Data?

Data will be stored and processed for the period required or justified by law or another legal order. If this period is shorter than necessary for the purposes of data processing, SIE will retain the Data as follows:

Category	Retention period
1/ Website Visitor Data	During the duration of your visit to our Website. Hereafter your Data will be included in anonymous statistics, from which the identity of specific persons or companies cannot be traced.
2/ Contact Details	Contact details are stored for the duration of the relationship and a subsequent duration of 3 months thereafter.
3/ Job Applicant Details	Job applicant details are used during recruitment and are stored for the duration of the 2-year procedure and stored for the duration of 6 months after the recruitment phase has been terminated.
4/ Sponsor Details	Sponsor details are used for the duration of the sponsor activities and the subsequent 12 months.
5/ Social Media Data	Information obtained from social media activities is used for the duration of the relationship between SIE and you.
7/ Cookies	<i>Cf. Section about cookies.</i>

### Transfer of Data abroad

SIE is entitled to transfer your Data to SIE Service Providers, SIE members or clubs for the purpose of the data processing described in this Policy as well as to fulfil its purpose. These parties are bound to protect Data to the same extent as SIE. If the level of data protection in a country does not correspond to that in Switzerland or the rest of Europe, SIE will contractually ensure that the protection of your Data always corresponds to that in Switzerland or the rest of Europe.

Specifically, this applies to data transfers to the USA, which from the point of view of the European Union and Switzerland does not have an adequate level of data protection. SIE will make sure that it implements guarantees to ensure an appropriate level of data protection. To do so SIE will make use of the guarantees recognised as sufficient to ensure an adequate level of data protection in the EEA and / or Switzerland.

## **Security of personal Data**

SIE applies strict standards to protect the Data under its control against unauthorized or unlawful processing and against unintentional loss, destruction or damage.

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 Data. You should always treat your access data confidentially and close the browser window when you have finished communicating with us, especially if you share your computer, tablet or smartphone with others.

In the unlikely and unfortunate case that your 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.

We also care about data protection internally. Our employees and the SIE Service Providers are contractually obliged to ensure confidentiality of personal data and compliance with applicable data protection laws.

## **Your rights as a data subject**

You have a right to request information about the personal data that we store about you. In addition, you have a right to correct incorrect data and a right to request deletion of your personal data, insofar as there is no legal obligation to retain such data and no legal basis for further processing the existing data.

You also have a right to request the data that you have provided to us (right to data portability). Upon request, we will transfer your data to a third party of your choice. You have a right to receive the data in a common file format.

In many countries, you also have the right to file a complaint with the relevant data protection authority if you have concerns about how we process your data.

These rights depend on the applicable data protection legislation and may be either more limited or more comprehensive.

## **Exercise of your rights**

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](mailto:privacy@soroptimisteurope.org), via the contact form on our Website, or via the 'unsubscribe' button at the bottom of our newsletters.

## **Cookies**

- 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.

- 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 targeted at the European Union are required to ask for your consent 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.
- Categories of cookies:  
Cookies can be subdivided based on their offspring, function and durability.  
Our Website only uses the following cookies:

### **Functionality cookies**

<b>Name</b>	<b>Function</b>
Authentication cookies 'Remember me'	Identification of the Website user.
Language Display cookies	Stores a language preference for the Website

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 processing activities, the content of these statements nor on the content of the cookies of these third parties.

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.

### **Applicable law and jurisdiction**

This Policy is subject to Swiss law, unless the law of another country is mandatory.

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.

### **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](mailto:siehq@soroptimisteurope.org)