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## Front Line Defenders Privacy Policy

January 2022

Front Line Defenders (referred to as Front Line Defenders or FLD in this policy)<sup>1</sup> is committed to protecting the privacy and personal data of its supporters and the human rights defenders (HRDs) it works with.

Front Line Defenders endeavours to protect all personal data through compliance with the Irish Data Protection Act 1988, the Irish Electronic Communications Regulations 2003, the UK Data Protection Act 1998 and the UK Electronic Communications (EC Directive) Regulations 2003.

### The Personal Data FLD Collects and Uses

Front Line Defenders collects different data depending on the stakeholder, including human rights defenders who receive a grant or participate in a training; donors; visitors to the website; members of the public who sign up to receive mailings, event attendees; contractors; etc.

## 1. Current and Potential Donors, Supporters

This section applies to you if you are a current donor to Front Line Defenders or a supporter who has demonstrated an interest in the organisation's work through an enquiry about volunteering or information about the organisation's work.

### What personal data does Front Line Defenders collect?

- Name, contact details
- Information relating to your donation
- Payment information

### How will Front Line Defenders use your data?

Front Line Defenders processes the personal data you provide for the following purposes:

- processing online donations
- donor relationship management purposes
- communicating with you
- conducting research and analysis
- audit purposes

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<sup>1</sup> Front Line: The International Foundation for the Protection of Human Rights Defenders (Ireland charity number CHY14029) and Front Line (UK) Foundation (UK charity registration 1119643) (which are together referred to as 'Front Line Defenders' in this policy)

### **With whom does FLD share your personal data?**

Auditors and accountants acting for Front Line Defenders may process your donation information, name and contact information for the purposes of conducting the annual audit.

Personal data of donors who are providing funds through PayPal will be protected by a secure server software operated by PayPal. [PayPal Privacy Statement](#)

### **How long will Front Line Defenders retain your data?**

Front Line Defenders retains your personal data in accordance with its Data Retention Policy. In general, this is 3 years after the end of your relationship with us.

Your financial information is retained only for as long as necessary to process payments authorised by you and to ensure the organisation is complying with its legal and regulatory obligations.

### **The legal basis on which Front Line Defenders collects and uses your personal data?**

When it is in your legitimate interests, the legitimate interests of Front Line Defenders and the legitimate interests of those whom Front Line Defenders supports for the organisation to administer your donations, keep you informed about our work, events and fundraising efforts and to tailor marketing and fundraising communications with you.

When it is necessary for the performance of a contract between Front Line Defenders and you.

If you have completed an online donation, Front Line Defenders processes your personal information on the basis of consent.

## **2. Human Rights Defenders (eg. Grantees, ID Card recipients, training participants, Urgent Appeals)**

### **What personal data does Front Line Defenders collect?**

- Name and contact details (phone, email, address)
- ID information (for Visas only)
- Bank details where applicable
- Gender
- Nationality

### **How will Front Line Defenders use your data?**

- To approve and administer the provision of grants
- To coordinate travel
- To communicate with you
- For conducting research and analysis
- For HRD relationship management purposes
- Providing you with a personalized service
- For contractual purposes

- To provide support in line with Front Line Defenders' charitable purposes to human rights defenders at risk.
- To provide you with information or services

### **With whom does FLD share your personal data?**

Auditors of Front Line Defenders may process your financial information for the purposes of conducting the annual financial audit of the organisation.

Front Line Defenders will request your consent before sharing your personal data with another entity.

### **How long will Front Line Defenders retain your data?**

Front Line Defenders retains your personal data in accordance with its data retention policy.

Grant contracts are retained for 7 years;

Grant applications are retained for 6 years;

Data required for travel is retained for 6 months after the travel has been completed.

### **The legal basis on which Front Line Defenders collects and uses your personal data?**

When it is necessary for the performance of a contract;

When it is necessary for Front Line Defenders to comply with a legal obligation;

Where the personal data is gathered from a form you have submitted to Front Line Defenders, your personal data is processed on the basis of consent.

## **3. Members of the public who sign up to mailing lists**

This section applies to you if you use the Front Line Defenders website or other means to request information about the organisation's work.

### **What personal data does Front Line Defenders collect?**

- Name, contact details
- Other personal data provided by you

### **How will Front Line Defenders use your data?**

Front Line Defenders uses your personal information to provide you with email updates and other information at your request or to answer your questions.

### **With whom does Front Line Defenders share you personal data?**

Front Line Defenders does not share your personal data with any other entity.

### **How long will Front Line Defenders retain your data?**

Front Line Defenders will keep your personal information for as long as necessary to answer your query or for as long as you wish to continue receiving information from us. You may notify Front Line Defenders at any time to be removed from a mailing list, or respond to the 'unsubscribe' option available in all bulk email communications.

### **The legal basis on which Front Line Defenders collects and uses your personal data?**

Front Line Defenders processes your personal information on the basis of its legitimate interests in providing you with information about our activities and responding to your requests for information.

Front Line Defenders processes your personal information on the basis of consent given when you provide your personal data via an online form or when communicated by email, or some other means of signing up for such communications.

## **4. Job Applicants**

### **What personal data does Front Line Defenders collect?**

- Name, contact details
- Employment details
- Background information such as educational background
- Any other Information you are asked to or choose to share with Front Line Defenders.

### **How will Front Line Defenders use your data?**

For recruitment, selection, evaluation of candidates for the job you have applied for;  
General HR administration and management, including monitoring the number of applications received for each advertisement;  
Compliance with governance and legal requirements.

### **With whom does Front Line Defenders share your personal data?**

Front Line Defenders takes care to share your personal information only with those who will need it to evaluate your application and qualifications for the position(s).

### **How long will Front Line Defenders retain your data?**

Front Line Defenders will keep your personal information for as long as necessary in connection with the purposes of processing your data.

Front Line Defenders will retain CVs for one year after the recruitment process is completed; after one year, the documents will be destroyed.

## **The legal basis on which Front Line Defenders collects and uses your personal data?**

In the legitimate interests of Front Line Defenders, namely the recruitment, selection, evaluation and appointment of new employees and the management and administration of the recruitment and HR process, to the extent these activities do not prejudice or harm your rights and freedoms.

Front Line Defenders processes your personal information on the basis of consent given when you provide your personal data.

## **What are your data protection rights?**

### **The right to access and the right to data portability**

Should you wish to receive a copy of your personal information retained by Front Line Defenders, the organisation will facilitate such requests upon full confirmation of the identity of the person inquiring. Front Line Defenders will respond within 40 calendar days.

### **Right to have your personal data corrected or erased**

All individuals who share personal data with Front Line Defenders have the right to have their personal data corrected, if inaccurate, or erased from our records. Front Line Defenders will comply with the request within 40 calendar days.

### **The right to restrict processing**

You have the right to request that Front Line Defenders restrict the processing of your personal data, under the following conditions:

- If you have contested the accuracy of your personal data;
- If your personal data has been unlawfully processed;
- If you require your personal data for the purpose of a legal claim;
- If you have objected to processing of your data under [Article 21 of GDPR](#)<sup>2</sup>.

### **The right to object to processing**

You have the right to object to Front Line Defenders processing of your personal data, under the following conditions.

If the processing is for:

- direct marketing purposes
- a task carried out in the public interest

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<sup>2</sup> [Art.21 GDPR](#): Right to Object – The data subject shall have the right to object, on grounds relating to his or her particular situation, at any time to processing of personal data concerning him or her which is based on point (e) or (f) of Article 6(1), including profiling based on those provisions.

- the exercise of official authority vested in you
- your legitimate interests

If you would like to contact the organisation in this regard, please write to the Data Officer in writing via email ([dataprotection@frontlinedefenders.org](mailto:dataprotection@frontlinedefenders.org)) or by post to Front Line Defenders, Grattan House, Temple Road, Blackrock, Co. Dublin.

## **Website ([www.frontlinedefenders.org](http://www.frontlinedefenders.org))**

Front Line Defenders may also collect information about your computer, including where available your IP address, operating system and browser type, for system administration and as part of analytic data collected by third party tools (Matomo). This is statistical data about the browsing actions and patterns of the people who use our website, and does not identify any individual.

For the same reason, Front Line Defenders may obtain information about your general internet usage by using a cookie file which is stored on the hard drive of your computer. Cookies contain information that is transferred to your computer's hard drive.

Cookies enable Front Line Defenders:

- to estimate audience size and usage pattern.
- to store information about your preferences, and so allow us to customise our site according to your individual interests.
- to speed up your searches.
- to recognise your browser when you return to the site.

You may refuse to accept cookies by activating the setting on your browser which allows you to refuse the setting of cookies or by refusing the cookies when the request to accept appears on the Front Line Defenders homepage. However, if you refuse the cookies, you may be unable to access certain parts of our site. When you visit the site for the first time, you are asked to accept or refuse cookies.

## **Personal information**

Names, addresses, telephone numbers and email addresses are protected by Front Line Defenders on a secure computerised system which is designed to ensure that any risk of loss, misuse, unauthorised access, disclosure, alteration or destruction of personal donor information is kept to an absolute minimum.

Unfortunately, however, the transmission of information via the internet is not completely secure. Although the organisation does its best to protect your personal data, including the use of encryption technology, Front Line Defenders cannot guarantee the security of your data transmitted to our site; any transmission is at your own risk.

## **Sensitive information**

Donations information are collected on the FLD Website, PGP encrypted and sent to the FLD Finance Team. No information is stored on the web server. Where PayPal is used, donations, including credit card numbers and account numbers received online are protected by a secure server software operated by a third party supplier PayPal. This software encrypts financial information provided online and prevents any outside source from reading personal and sensitive information at any point during the donation process. Should you require any further information about this service please visit [Paypal's website](#).

Front Line Defenders does not retain credit card details once a transaction has been finalised unless the organisation obtains consent from the donor to retain such details for monthly donation support.

The Front Line Defenders website may, from time to time, contain links to and from the websites of third parties. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that FLD does not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites.

Grant Applications may contain special category personal data under article 9 of the GDPR. Front Line Defenders will process this data for the sole purpose of assessing the grant request in the frame of this privacy policy. Front Line Defenders may process this data in order to fulfill the goals and guidelines of the organisation according to this privacy policy. In some cases, vaccination information is requested for the purpose of planning the travel of HRDs, trainers, guests, consultants, etc. to Front Line Defenders events and trainings. Front Line Defenders may process sensitive data in order to fulfill the goals and guidelines of the organisation according to this privacy policy. All sensitive information is treated as confidential and will only be shared internally where there is a specific and legitimate purpose to do so. There exists appropriate physical, technical, and organisational security measures designed to secure this data.

## **Transfers Outside the EU**

There may be some instances where your personal information is transferred to countries outside of the European Economic Area ("EEA") such as when FLD transfers information to our third party suppliers who are based outside the EEA or when third parties who act on FLD's behalf transfer your personal information to countries outside the EEA.

Personal data stored on the organisation's secure encrypted computerised database is accessible to staff based outside of the EEA. This database is designed to ensure that any risk of loss, misuse, unauthorised access, disclosure, alteration or destruction of personal information is kept to an absolute minimum.

Personal data will only be transferred outside the EEA for the purpose of the processing of the data under the legitimate interest of the data subject or to comply with contractual obligations. Where such a transfer takes place, we will take the appropriate safeguarding measures to ensure that your personal information is adequately protected.

### **Changes to this Front Line Defenders privacy policy**

Front Line Defenders keeps its privacy policy under regular review and places any updates on this web page. This privacy policy was last updated in November 2021.

### **How to contact Front Line Defenders**

If you have any queries or questions about the Front Line Defenders privacy policy and/or security of your personal data and/or you would like to exercise one of your data protection rights, please contact Front Line Defenders at [dataprotection@frontlinedefenders.org](mailto:dataprotection@frontlinedefenders.org)

### **How to contact the appropriate authorities**

Should you wish to report a complaint or if you feel that Front Line Defenders has not addressed your concern in a satisfactory manner, you may contact the Irish Data Protection Commission: [info@dataprotection.ie](mailto:info@dataprotection.ie)

This policy is subject to change. Any changes to Front Line Defenders Privacy Policy will be posted on this page without prior notification.