

NOTE: this Privacy Policy relates to individual CISV volunteers and employees, who register with us to give, receive or otherwise participate in a "CISV International Event", be it a Regional Training Forum, Regional Meeting, an International Junior Branch Event, a Global Conference or any other approved International meeting.

## PART 1: INTRODUCTION

Thank you for reading our Privacy Policy. In it, we explain how we collect, use, and share the Personal Information that you share with us.

By "Personal Information" we mean personal data as defined in the UK <u>Data Protection Act 1998</u> (DPA), and from 25 May 2018, as defined in the <u>General Data Protection Regulation</u> (GDPR). In general, it means any information relating to you, which identifies you or allows you to be identified. That may be your name, an ID number, location, an online identifier or factors specific to you (e.g. physical, physiology (thoughts, feelings), genetic, mental, economic, cultural or social factors).

This Privacy Policy has four parts:

- 1. This introduction
- 2. Important information about your rights in relation to consent and to object to our use of your Personal Information
- 3. Key information required by the GDPR
- 4. Information about our registration platform provider, Certain, Inc.

If you have any queries about this Privacy Policy please contact our data protection officer (please see the "Data Protection Officer" section b in PART 3: KEY INFORMATION below).

# PART 2: IMPORTANT!

Your rights in relation to consent: if you are in the European Economic Area, we ask you to consent to the transfer of your Personal Information to Certain, Inc.'s registration platform in the USA. This consent is only necessary to the extent (if any) that Certain, Inc.'s Privacy Shield certification does not cover the transfer. You may withdraw your consent at any time. However if you do so, we may not be able to register you on or provide you with the CISV International Event.

You may voluntarily provide us with sensitive Personal Information (such as information about your health or personal/special needs so that we can make adjustments). You may, at any time, withdraw your explicit consent to us using that sensitive Personal Information. However, please be aware that, without this information, we will not be able to make adjustments to provide for your needs.

To withdraw your consent, please contact us.

### Please see:

- section a in PART 3: KEY INFORMATION below for our contact details
- sections c and g in PART 3: KEY INFORMATION below for further details of where we rely on your consent, and
- section j in PART 3: KEY INFORMATION below for further details of your right to withdraw consent.



Your right to object to our use of the "legitimate interests" basis for processing: we consider that our sharing of your Personal Information with CISV National Associations and Chapters, and our use of your Personal Information for our accounts and records and for quality management on CISV International Events is in our legitimate interests and the legitimate interests of participants attending our educational programmes (who have an interest in properly prepared and trained organizational and programme leaders).

You may object to our use on that basis, however please note that sharing Personal Information within the CISV family is also necessary for contract purposes. To exercise your right, please contact us.

#### Please see:

- section a in PART 3: KEY INFORMATION below for our contact details
- section d in PART 3: KEY INFORMATION below for further details of our reliance on the legitimate interests basis for processing, and
- section i in PART 3: KEY INFORMATION below for further details of your right to object.

#### PART 3: KEY INFORMATION

Here are important details about us and our use of your Personal Information.

GDPR Requirement	Our details
a. Our identity and contact details  Identity and contact details and, where applicable, of the representative	CISV International Ltd, registered in England & Wales with company registration no. 3672838; registered with the Charity Commissioner charity no. 1073308.
	Address: Mea House, Ellison Place, Newcastle upon Tyne, Tyne & Wear, NE1 8XS, England.
	Telephone: +[44] 0191 2324998
	Email: international@cisv.org
b. Data protection officer  Contact details of the data protection officer, where applicable	To contact our data protection officer, please use our contact details in the "Identity and contact details" section a above. Ask for the data protection officer or address your communication to the "Data Protection Officer".  We are entered in the UK Information Commissioner's register of data controllers with registration number Z7421894.
c. Purposes and legal basis  The purposes of the use for which the Personal Information is intended as well as the legal basis for the use	The purposes for which we use Personal Information are:  to deliver meetings and training as part of engaging and managing volunteers and employees; the corresponding legal basis for our processing is to enter into or perform a contract (in other words, to fulfil our part in delivering the CISV International Event which you wish to attend)  to make adjustments for any health condition or personal needs you tell us about (this may be within or outside of the registration platform); it is entirely up to you whether or not you provide this



GDPR Requirement	Our details
	information, but if you do, the corresponding legal basis is your explicit consent accounts and records; the corresponding legal basis is our legitimate interests to administer the CISV International Event alongside relevant CISV National Associations and Chapters; the corresponding legal bases for our processing is to enter into or perform a contract, and also our legitimate interests for quality assurance (statistics); the corresponding legal basis is our legitimate interests.
d. Legitimate interests	Our legitimate interests are:
Where the use of information is based on the legitimate interests condition, the legitimate interests pursued	to keep accounts and records so that we can establish who participated in a CISV International Event, and when and where, should that become necessary at any time in the future to administer the CISV International Event globally; to do this we must share your Personal Information with the CISV National Associations and Chapters relevant to you and your participation (but this administration is also made on the basis of being necessary for contract purposes, see the "Purposes and legal bases" section c, as are any transfers – please see the "Transfers outside the EEA" section g) for quality management: we will analyse Personal Information to determine patterns and trends in our service provision.  Those third parties attending our educational programmes have a legitimate interest in the provision of quality assured education and supervision, which is the aim of our CISV International Event.
e. Personal Information collected indirectly –	We collect the following categories of Personal Information indirectly (i.e. from third parties):
categories The categories of Personal Information collected indirectly	none – unless you are under the age of 18 years and a parent or carer provides us with your Personal Information or completes a form on your behalf, in which case we collect the categories of Personal Information will be those provided by your parent/carer or those set out on the relevant form(s) (which will have their own privacy notice(s)).
f. Recipients	We may share your Personal Information with:
The recipients or categories of recipients of the Personal Information, if any	suppliers (for example service providers such as Certain, Inc. (see below) and CISV National Associations and Chapters who are involved in administering the CISV International Events) financial organisations (if necessary to process your payment) consultants and professionals (if required in relation to the CISV International Events or the particular situation – for example if you become ill, we may need to share your Personal Information with a local healthcare provider), and



GDPR Requirement	Our details
	other recipients as permitted or required by applicable law.
g. Transfers outside of the European Economic Area (EU member states, Norway, Iceland and Liechtenstein)	Transfers to the USA and other countries  The third party registration and payment platform we use (operated by Certain, Inc. ("Certain") is hosted in the US and your Personal Information will therefore be transferred to Certain's US-based data centres. Certain has joined the EU-US Privacy Shield, which has an
Where applicable, the fact that Personal Information is to be transferred to a third country or international organisation and the existence or absence of an adequacy decision by the European Commission, or in the case of transfers subject to appropriate safeguards or non-repetitive, limited transfers based on compelling legitimate interests, reference to the appropriate or suitable safeguards and the means by which to obtain a copy of them or where they have been made available.	adequacy decision from the European Commission: please see <a href="https://www.privacyshield.gov/welcome">https://www.privacyshield.gov/welcome</a> . To see Certain's certification, go to "Privacy Shield List" on the Privacy Shield website and search for "Certain". Please also see PART 4: CERTAIN, INC. at the end of this Privacy Policy for more information about Certain.
	Please note that on registration, we also ask you to <b>consent</b> to the transfer of your Personal Information to the US. This is to cover the situation where Certain's Privacy Shield certification lapses or does not cover the transfer for some other reason, or Privacy Shield itself is found to be invalid and appropriate safeguards such as standard contractual clauses are not available.
	We operate in 70 countries. We will transfer your Personal Information to CISV National Associations and Chapters that are outside the European Economic Area to the extent necessary to administer your registration and participation in the CISV International Event. For example if you live in Belgium but are travelling to Australia, the Belgian and Australian National Associations may be involved, as well as the Chapters nearest to where you live and to the CISV International Event. The basis for those transfers is that they are necessary for <b>contract purposes</b> , namely:
	the performance of a contract between you and us, or the implementation of pre-contractual measures taken at your request, or are necessary for the conclusion or performance of a contract concluded in your interests between us and another person.
	Please note that the absence of an adequacy decision and appropriate safeguards creates possible risks that you will not have the same rights and remedies in respect of the processing of your Personal Information once it is the US or other non-EEA countries as you would have in the EEA.
	Further information
	Here is a short explanation of the options for transferring Personal Information outside the EEA.
	First, an "adequacy decision" which is a legal decision by the European Commission that adequate protection is provided by a country, territory, specified sector(s) or an international organisation.



GDPR Requirement	Our details
	It is based on an assessment of the following: (a) rule of law and other legal considerations (b) existence and functioning of an independent supervisory authority and (c) international commitments and obligations/participation.
	Secondly "appropriate safeguards" which may take several forms, including:
	standard data protection clauses adopted by the European Commission
	other contract clauses that have been approved by a data protection authority (supervisory authority) in the EEA
	"binding corporate rules" which apply to a group of companies or enterprises engaged in a joint economic activity
	an approved code of conduct or approved certification mechanism, which binds the organisation in the third country and can be enforced.
h. Storage period  The period for which the Personal Information will be stored, or if that is not possible, the criteria used to determine that period	The period for which we will store Personal Information is based on our need to fulfil our legitimate operational needs, comply with applicable law, resolve disputes, and enforce our agreements.
i. Individual rights	You have rights to make a request to us:
The existence of the right to request access to and rectification or erasure of Personal Information or restriction of use concerning the individual or to object to use as well as the right to data portability	for access to your Personal Information for rectification or erasure of your Personal Information (until 25 May 2018, this is only where the Personal Information is inaccurate) for restriction of processing concerning you (until 25 May 2018, this is only where the Personal Information is inaccurate) to object to our processing which is based on legitimate interests (until 25 May 2018, this is only where the processing is or is likely to cause substantial and unwarranted damage or distress) – please see the "Legitimate Interests" section d. above for our reliance on this legal basis for processing to object to direct marketing (including, from 25 May 2018, to object to related profiling) to receive the Personal Information which you have provided to us, in a structured, commonly used and machine-readable format, and to have us transmit that Personal Information to another controller (from 25 May 2018).  (Continued on the next page).



GDPR Requirement	Our details
	Where we rectify, erase or restrict your Personal Information, we will inform third parties who have received your Personal Information as required by applicable law.
	To exercise your rights, please contact us. Our contact details are in the "Identity and contact details" section a. above.
j. Withdrawal of consent Where the use is based on consent (for ordinary or sensitive Personal Information), the existence of the right to withdraw consent at any time, without affecting the lawfulness of use based on consent before its withdrawal	You have a right to withdraw any consent you give us at any time.
	Please see the "Purposes and legal bases" section c. and the "Transfers outside the EEA" section g. for details of our reliance on consent for processing.
	This will not affect the legality of our consent-based use before you withdrew consent.
	To exercise your right to withdraw, please contact us. Our contact details are in the "Identity and contact details" section a. above.
k. Complaints The right to lodge a complaint with a supervisory authority	You have a right to complain to the UK Information Commissioner, whose contact details are:
	Information Commissioner's Office Wycliffe House Water Lane Wilmslow Cheshire SK9 5AF England
	Telephone: 0303 123 1113 (local rate) or + [44] 01625 545 745 (national rate).
	Website: <a href="https://ico.org.uk">https://ico.org.uk</a> , which sets out email addresses and an email form.
I. Information collected directly – legal or contract requirement	We need all the registration details asked for on the form and (if you are paying for yourself) your payment details, to perform the CISV International Event contract (provide you with the meeting or
Whether the provision of Personal Information is a statutory or contractual requirement, or a requirement necessary to enter into a contract, as well as whether the individual is obliged to provide the Personal Information and of the possible consequences of failure to provide that	training) or to take steps at your request before to entering into the CISV International Event contract.
	If you do not provide the Personal Information, we will not be able to register you on or provide you with the CISV International Event.



GDPR Requirement	Our details
information	
m. Sources of Personal Information collected indirectly  The source of the Personal Information and if applicable, whether it came from publicly accessible sources	The sources of the Personal Information we collect indirectly are:  your parent or carer, if you are under 18 years old and they complete a form or otherwise provide your Personal Information on your behalf.
n. Automated decision- making	We do not conduct any automated decision-making in relation to the CISV International Events. All decisions are made by humans.
The existence of automated decision-making, including profiling. This means a decision based solely on automated profiling which produces legal effects concerning the individual, and which must not be based on special categories of (i.e. sensitive) Personal Information without explicit consent or substantial public interest with safeguards. Meaningful information about the logic involved, as well as the significance and the envisaged consequences of the processing for the individual must also be provided.	

# PART 4: CERTAIN, INC.

Certain provide the registration and payment platform we use to register you on a CISV International Event.

Certain will host the Personal Information you supply at registration on their US servers but will not use it for their own purposes other than their use of credit card data and names to process credit card transactions. For further details of Certain's use of your Personal Information, please see Certain's <a href="mailto:privacy@certain.com">privacy policy</a> or contact them at <a href="mailto:privacy@certain.com">privacy@certain.com</a>.