

ICNL EEA/UK/Switzerland Data Privacy Notice

Introduction

The International Center for Not-for-Profit Law (hereinafter “ICNL”) created this EU/UK/Switzerland Data Privacy Notice (the “Privacy Notice”) to transparently explain how ICNL complies with certain data privacy rights specifically available to individuals located in the European Economic Area (“EEA”), United Kingdom (“UK”), or Switzerland (collectively referred to as the “Designated Countries”).

This Privacy Notice supplements ICNL’s general Privacy Policy & Terms of Use (the “General Privacy Policy”) related to use of ICNL’s website, found here: <https://www.icnl.org/privacy-policy>.

The below information describes ICNL’s data collection, data usage, data management, and dissemination practices for personal data of individuals located in the Designated Countries. These may change at any time; any changes will be posted on ICNL’s website.

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The “Data Controller”

ICNL is the data controller of any personal data (in other words, the organization which is responsible for the processing of your personal data and determines how your personal data is used). Our contact details are as follows:

Name:	International Center for Not-for-Profit Law (ICNL) Attn: Vice President - Operations
Address:	1660 L Street NW, Suite 600 Washington, D.C. 20036, USA
Phone:	+1 (202) 582-8600
Email:	info@icnl.org

Purpose and Terms of the Privacy Notice

This Privacy Notice is designed to help you understand what data of individuals located in the Designated Countries at the time of collection is processed by ICNL as Data Controller during the course of services offered by our organization, and the ways the personal data is used.

Please read this Privacy Notice carefully to understand the ways in which ICNL uses personal data and its reasons for doing so.

Legal Background to the Privacy Notice

ICNL processes personal data and ensures the protection of the data in accordance with its own internal privacy practices and the laws of the Designated Countries including the EEA’s General Data Protection Regulation (GDPR).

ICNL is committed to processing your personal data in accordance with applicable data protection laws and ICNL will perform any data processing whilst complying with the following principles:

- **Lawfulness, fair processing, and transparency:** Personal data must be processed lawfully, fairly, and transparently.
- **Purpose limitation:** Personal data may only be collected for specified, explicit, and legitimate purposes, and not processed in a manner incompatible with those purposes.
- **Data minimization:** Personal data may only be processed if adequate, relevant, and limited to what is necessary in relation to the purpose.
- **Data quality (accuracy):** Personal data must be accurate, complete, and kept up to date.

- **Storage limitation:** Personal data must be kept for no longer than is necessary for the above-mentioned purpose.
- **Integrity and confidentiality:** ICNL will ensure there is appropriate security to protect the personal data against unauthorized or unlawful processing and against accidental loss, destruction or damage using appropriate technical or organizational measures.
- **Accountability:** ICNL is responsible for, and must be able to demonstrate compliance with, the above-detailed principles and aspects of data processing.

Legal Basis for Processing

Under the laws of the Designated Countries, there must be a lawful basis for collecting or using personal data. There are three (3) lawful bases that are pertinent to how ICNL meets this obligation:

EXPLICIT CONSENT: ICNL may obtain 'explicit consent' from an individual as the lawful basis for processing personal information. The consent must be freely given, informed, and provided through a statement or other explicit affirmative action, such as clicking an opt-in button on an electronic form. An individual is also allowed to withdraw consent after it is given. It must be clear to the individual that they are giving ICNL permission to collect, use and store their personal data and allow them to understand how ICNL will use it.

LEGITIMATE INTEREST: Having a 'legitimate interest' basis for collecting and using personal data means explicit consent is not required. The organization's legitimate interest in using the information must be balanced against the interests and rights of the individual data subjects. For example, when an individual has expressed an interest in events on certain subjects, ICNL would typically have a legitimate interest in using that person's contact information to inform them about an upcoming event on one of those topics. ICNL also has a legitimate interest in using personal data to maintain security of its website and information technology systems.

PERFORMANCE OF CONTRACTS: When ICNL enters into a contract or agreement with an entity or individual, the organization is permitted to collect and use personal information needed to fulfill contractual commitments, such as payment processing and delivery of a service or product.

Children's Privacy

Our website, products, and services are all directed to people who are at least sixteen (16) years old or older. Consistent with the requirements of the US Children's Online Privacy Protection Act (COPPA), the GDPR, and all other applicable laws and regulations. If we learn that we have received information directly from a child under age sixteen (16) without verified consent from a parent or legal guardian, we will use

that information only to respond directly to that child (or his or her parent or legal guardian) to inform the child that he or she cannot use our Services. Subsequently, we will delete such information.

How do we collect your data?

You directly provide ICNL with most of the data we collect. We collect data and process data when you:

- Contact ICNL or make an inquiry via the post, via phone, or by electronic means (email).
- Voluntarily register online for any of our services, including, but not limited to, registering to attend events, or entering your contact information to receive our newsletters. In the latter example, such information will be uploaded to our email marketing system (Mailchimp).
- Voluntarily complete an online questionnaire or survey or provide similar feedback on any of our social media pages or via email.
- Enter into a contract or agreement with ICNL.
- Engage with ICNL or contact ICNL on one of its social media platforms (such as X (formerly Twitter), LinkedIn, Facebook, or Instagram), for example, by mentioning ICNL, tagging ICNL in a post, contacting ICNL directly, or posting on ICNL's page.
- Use or view our website via your browser's Cookies.

What data do we collect?

ICNL collects the following personal data:

- Personal identifiable information (Name, email address, IP address, phone number, physical address, etc.)
- Information for the registration of events and general data backups.

ICNL collects personal data through the following sources:

- Collected directly from the data subject (normally contained in the inquiry).
- ICNL's website.
- ICNL's social media accounts.

How will we use your data?

ICNL collects your data so that we can:

- Identify the interested person or subscriber and maintain subscriber contact.

- Communicate organizational news, updates, events, and share insights on civic space trends.
- Email information about our services via our email marketing system (Mailchimp or a similar service).
- Reach you on social media through select posts about ICNL-related events, reports, and other ICNL-developed informational products.
- Collect information about your visit to our website, your usage of our materials, and your web browsing.
 - That information may include your IP address, your operating system, your browser ID, your browsing activity, your type of device, and other information about how you interacted with our websites or other websites. We may collect this information as a part of log files as well as through the use of cookies or other tracking technologies. See [“Cookies” sections below](#).
- Host a server (on behalf of ICNL by a third party) and backups.

How do we store your data?

ICNL implements a variety of security measures to maintain the safety of your personal information when you enter, submit, or access your personal information via ICNL’s digital assets. We do not sell or trade your information to outside parties. This does not include trusted third parties who assist us in operating our website, conducting our business, or servicing you, so long as those parties agree to keep this information confidential. We may also release your information when we believe release is appropriate to comply with the law, enforce our site policies, or protect ours or others’ rights, property, or safety. However, non-personally identifiable visitor information may be provided to other parties for marketing, advertising, or other uses.

Your data thus received will be securely stored electronically and will only be printed if it is necessary for the applicable record management requirements.

DURATION OF PROCESSING: ICNL will retain your personal data for as long as is necessary to comply with applicable laws, our contractual obligations with you and further to our legitimate business interests. Retention periods are unlikely to be uniform as the time ICNL needs to retain your personal data will vary according to the type of the data and the purpose of the processing.

Marketing

ICNL may send you information about our products, services, and activities that we think you might be interested in, as well as those of our partner organizations. We

may use our email system or send you communications through Mailchimp or a similar service.

If you have agreed to receive marketing information, you may always opt out at a later date. You have the right at any time to stop ICNL from contacting you for marketing purposes. If you no longer wish to be contacted for marketing purposes, please click the unsubscribe button.

What are your data protection rights?

ICNL would like to make sure you are fully aware of all of your data protection rights. Every user is entitled to the following:

The right to access – You have the right to request ICNL for copies of your personal data. We may charge you a small fee for this service.

The right to rectification – You have the right to request that ICNL correct any information you believe is inaccurate. You also have the right to request ICNL to complete the information you believe is incomplete.

The right to erasure – You have the right to request that ICNL erase your personal data, under certain conditions.

The right to restrict processing – You have the right to request that ICNL restrict the processing of your personal data, under certain conditions.

The right to object to processing – You have the right to object to ICNL's processing of your personal data, under certain conditions.

The right to data portability – You have the right to request that ICNL transfer the data that we have collected to another organization, or directly to you, under certain conditions.

EXERCISING YOUR DATA PROTECTION RIGHTS: Please understand that your rights in relation to your personal data are not absolute and that ICNL must be cognizant of its legal obligations. You may make a request regarding your personal data rights by filling out and sending this [“Data Subject Access Request Form”](#) to us using the contact information provided in the [“Data Controller”](#) section. We may request that you provide proof of your identification for security reasons and in order to prevent the unauthorized disclosure or misuse of personal data. We will seek to promptly respond to your request, usually within one month.

Cookies

Cookies are small files that a website or its service provider transfers to your computer's hard drive through your web browser (if you allow) that enables the sites

or service providers systems to recognize your browser and capture and remember certain information.

For further information, visit <https://allaboutcookies.org/>.

How Do We Use Cookies?

ICNL uses cookies in a range of ways to improve your experience on our website. We use cookies to compile aggregate data about site traffic and site interaction so that we can offer better site experiences and tools in the future. We may contract with third-party service providers to assist us in better understanding our site visitors. These service providers are not permitted to use the information collected on our behalf except to help us conduct and improve our website.

What Types of Cookies Do We Use?

There are a number of different types of cookies, however, our website uses:

- **Functionality** – ICNL uses these cookies so that we recognize you on our website and remember your previously selected preferences. These could include what language you prefer and location you are in. A mix of first-party and third-party cookies are used.
- **Advertising** – ICNL uses these cookies to collect information about your visit to our website, the content you viewed, the links you followed and information about your browser, device, and your IP address. ICNL sometimes shares some limited aspects of this data with third parties for advertising purposes. We may also share online data collected through cookies with our advertising partners. This means that when you visit another website, you may be shown advertising based on your browsing patterns on our website.

DATA PROCESSING Related to the Application of Cookies				
Data Category	Purpose of Processing	Legal Ground of Processing	Source of Data	Duration of Processing
Cookie	Identification of the users' current session, saving data provided during the session, preventing data loss in order to measure the success of user communications.	Legitimate interests of ICNL to ensure that its website works properly and that the website content is of high quality.	ICNL's Website	Until termination of the session.

How to Manage Cookies

You can set your browser not to accept cookies, and the aforementioned website (<https://allaboutcookies.org/>) tells you how to remove cookies from your browser. However, in a few cases, some of our website features may not function as a result.

Privacy policies of other websites

The ICNL website may contain links or references to other websites maintained by third parties over whom ICNL has no control. Such links are provided merely as a convenience and do not imply an endorsement or recommendation by ICNL of such third-party websites or the material contained therein. Similarly, the ICNL website may be accessed from third party links over which ICNL has no control. ICNL makes no warranties or representations or assumes any legal liability of any kind as to the accuracy, currency, completeness or usefulness of any information contained in such third-party websites and shall have no liability for any damages or injuries of any kind arising from or caused, directly or indirectly, by the creation or use of a third party's website, or the information or material accessed through such third-party websites.

Please be aware that this Privacy Notice and ICNL's General Privacy Policy do not apply to your activities on third-party websites or any information you disclose to those third parties, so if you click on a link to another website, you should read their privacy policy.

Changes to ICNL's Privacy Notice

ICNL keeps its Privacy Notice under regular review and places any updates on the ICNL website. This Privacy Notice was last updated on **19 July 2024**.

Complaints or Questions

If you believe that ICNL has infringed or violated your privacy rights, please contact us so that we can work to resolve your concerns.

Email us at: info@icnl.org

Call us at: +1 (202) 582-8600

Write to us: International Center for Not-for-Profit Law (ICNL)
Attn: Vice President – Operations
1660 L Street NW, Suite 600
Washington, D.C. 20036, USA

You also have a right to report a complaint to a competent supervisory authority situated in a Member State of your habitual residence, place of work, or place of alleged infringement. Relevant contact details are listed below:

- [EEA](#)
- [UK](#)
- [Switzerland](#)