

RightsTech Women Data Privacy Policy

Last updated June 2022

1 General Provisions

1.1 Scope

RightsTech Women (RTW) is a Swiss, Geneva-based, non-profit association dedicated to advancing the human rights of women and girls in the fields of science, technology, engineering and mathematics (STEM).

RTW takes your privacy very seriously and makes every reasonable effort to safeguard your personal data and to comply with all applicable laws, policies, and regulations related to the collection and processing of personal information. RTW is aware and reminds its service users, however, that no method of transmission over the Internet, or method of electronic storage, is 100% secure. While we use industry standard means to protect your personal information, we cannot guarantee its absolute security.

This policy (Privacy Policy) applies to personal information, set out in Section 2 below, that is collected and processed:

- i. via our website and mobile applications;
- ii. in the course of RTW research, training or advocacy (RTW Programs); or,
- iii. in the frame of employment with RTW.

1.2 Purpose

The Privacy Policy is intended to inform you of RTW's personal data collection and processing practices, how this information is used, of the identified or identifiable natural person's choices associated with that data, and what steps we take to protect that information.

1.3 Applicability

RTW is headquartered in Geneva, Switzerland. It operates globally, and as such, RTW may access and transfer personal information from other countries around the world to authorized service providers or business partners in other countries working on our behalf in accordance with applicable law. This policy is applicable worldwide. If you have any questions or concerns about the Privacy Policy, please contact us at [privacy \(at\) rightstech.org](mailto:privacy@rightstech.org).

1.4 Legal bases for personal information collection and processing

In accordance with the General Data Protection Regulation (GDPR), we only collect and process your personal data on one or more of the following legal bases, which include:

- i. *legitimate interest*: based on our legitimate interests in communicating with you and managing our interactions with you;
- ii. *compliance with applicable laws*: to comply with a relevant legal obligation (e.g., where we are required to make disclosures to courts or regulators);
- iii. *contract*: for the performance of a contract;
- iv. *public interest*: for the performance of a task carried out in the public interest; and,
- v. *consent*: in limited circumstances, we will use your consent as the basis for processing special categories of information or prior to sending you electronic communications.

1.5 *Data minimization*

RTW minimizes the personal information it collects and processes, limiting it to what is necessary for the specific purpose.

1.6 *Right to Reject Automated Individual Decision-Making*

Subject to limited exceptions, data subjects have the right to refuse the automated processing of their personal information to make decisions about them if that significantly affects the data subject or produces legal effects (for example, profiling). (See *article 22 GDPR*.) RTW does not currently use automated processing of personal information to make decisions about individuals.

2 **Definitions**

2.1 *Personal information*

Personal information, also known as personal data, for the purposes of the Privacy Policy refers to any information that

- i. can be used to directly and clearly identify an individual, natural person ('data subject'), or
- ii. can be used in combination with other information to identify an individual.

Examples of personal information can include but are not limited to:

- i. the individual's name(s);
- ii. the individual's date of birth;
- iii. the individual's photograph;
- iv. the individual's home address;
- v. the individual's email address;
- vi. the name of the individual's family member or lawful guardian (e.g., a parent);
- vii. contact details of the individual's family member or lawful guardian;
- viii. an identification number;
- ix. location data; or,
- x. an online identifier.

Any information that is anonymous or has been rendered de-identified by removing personal identifiers does not fall under personal information for the limited purposes of the Privacy Policy.

2.2 *Sensitive personal information*

Sensitive personal information is a category of personal information that may be more sensitive in nature for the individual in question.

Examples of sensitive personal information include but are not limited to:

- i. information on race and ethnicity;
- ii. sexual orientation;
- iii. political and religious beliefs;
- iv. financial information;
- v. information relating to health;
- vi. criminal records; or,
- vii. trade union membership.

2.3 *Data subject*

‘Data subject’ means an identified or identifiable natural person (an individual).

3 **Collecting of personal information by RightsTech Women**

3.1 *What personal information is collected?*

RightsTech Women collects and maintains different types of personal information in the course of its work, for specific purposes.

- i. *Employment:* Some examples of information collected for the purpose of job applications or employment with RTW include: name, gender, date or year of birth, telephone number, marital status, emergency contacts, residency and work permit status, nationality, passport information, banking details, wage, sick pay, paid time off, pensions, insurance, information from interviews and/or phone screenings, date of hire, date(s) of promotion(s), technical skills, educational background, professional certifications, language capacities, training records, letters of offer and acceptance of employment, the person’s resume or CV, cover letter, transcripts, references, interview notes, etc.
- ii. *RTW Programs:* Some examples of information collected for the purpose of RTW Programs include: name, gender, age, address, country, region, telephone number, email address, organization, year or role in one’s organization, prior technical experience, attendance and length of attendance in an event delivered in RTW Programs, and participant feedback. This information is used to manage all aspects of RTW Programs and interactions with stakeholders.

- iii. *Use of RTW resources:* Also included are personal information in any voicemails, emails, documents, and other correspondence created, stored, or transmitted using RightsTech Women's network, business applications, devices, and computers.

3.2 *How is such personal information collected?*

- i. Generally, the information is collected directly from the person in question in circumstances where such information is provided, i.e. during an interview, onboarding process, event registration process, etc. However, in certain cases, personal information can be collected through third parties, especially if the individual uses a service made available to them by RTW in RTW Programs (for example, through an event registration form such as Eventbrite or Framiforms).
- ii. RTW uses Google Analytics for the RTW website to understand usage and improve the reach of RTW's website services to rights holders and other stakeholders. Collection of such information about the use of our website also depends on the website user's own browser choice and privacy settings. You can learn more about Google Analytics' privacy policies and how to opt out of their cookies by visiting the link, <http://www.google.com/analytics/learn/privacy.html>.
- iii. Where permitted and required by applicable law or regulatory requirements, RTW may collect personal information about the person in question without their knowledge or consent, for the specific limited use (such as compliance with legal obligation), in accordance with section 1.3 of the Privacy Policy.
- iv. RightsTech Women reserves the right to monitor and collect information for industry standard business practices resulting from the use of its premises, equipment, devices, computers, network, applications, software, and similar assets or resources. Such monitoring may result in the collection and processing of personal information. Examples include verification of user identities or securing our resources.

3.3 *How is such personal information used?*

- i. *Employment:* The personal information collected by RTW is used for managing all aspects of the employment relationship or relationship analogous to employment. These aspects include but are not limited to establishment, maintenance, and termination of employment relationships, such as determining the initial eligibility for the employment, including the verification of references and qualifications; employee communications; performance evaluations; disciplinary actions; general operations in the fields of administration, finance, and human resources; maintenance of directories of employees; administration of

occupational safety and health programs; and, maintenance of emergency contacts and beneficiary details.

- ii. *RTW Programs:* The personal information collected and processed by RTW is used for managing all aspects of the RTW Programs, including advocacy, training and research, fundraising, marketing and business operations. A person may opt out of marketing communications through links that we provide for this purpose.

An example of how we use personal information is collecting RTW training event participant registration data, which we use to communicate with our training participants before, during and after the training. Personal information can be collected and processed by RTW to improve RTW Programs, for example when gathering RTW Programs beneficiaries' feedback. We usually collect feedback anonymously or give the option to provide your name and contact details. We use beneficiaries' participant data to track the reach and outcomes of RTW Programs and we report on the use of funds to donors who help us keep our trainings free to participants.

- iii. *Excluded use:* RTW never rents or sells personal information to third parties.

4 Accessing existing personal information

The individual is entitled to see the personal information RTW holds about them. In case the person wishes to review, verify, or correct their personal information, they should address their request to privacy (at) rightstech.org.

When accessing existing personal information, the individual may be required to provide specific information enabling RTW to identify them in order to grant them the right of access.

In some circumstances, actions requested under a person's right of access may not be granted (such as in relation to criminal offenses or when access adversely affects the rights and freedoms of others).

5 Correction of existing personal information

RTW strives to hold accurate and current information relevant to its staff, RTW Programs and business processes.

If an individual believes that the personal information about them is incorrect, incomplete or outdated, they may request the revision or correction of that information. RTW reserves the right not to change any personal information it considers to be accurate (e.g., a person's date of birth as indicated by their identity documents).

If it is determined that the personal information is inaccurate, incomplete or outdated, RightsTech Women will use reasonable efforts to revise it and, if necessary, to inform agents, service providers or other third parties, which RTW provided with inaccurate information, so records in their possession may be corrected or updated.

Any request to correct existing personal information shall be addressed to privacy (at) rightstech.org.

6 Retention and deletion of existing personal information

Except as otherwise permitted or required by applicable law or regulatory requirements, RTW will retain the individual's personal information only for as long as it believes it is necessary to fulfil the purposes for which the personal information was collected (including, for the purpose of meeting any legal, accounting or other reporting requirements or obligations).

The individual may request that RTW delete the personal information about them that it holds. There are instances where applicable law or regulatory requirements allow or require RTW to refuse to delete this personal information. In the event that RTW cannot delete the individual's personal information, it will inform the individual of the reasons why, subject to any legal or regulatory restrictions.

Any request to delete existing personal information shall be addressed to privacy (at) rightstech.org.

7 Right to supplement and/or amend

RTW reserves the right to supplement and/or amend this Privacy Policy at any time.

In such a case, this will be notified through the RTW website and/or, in the event of a significant change, to the extent possible, directly communicated to those concerned.

RTW supplements this Privacy Policy with specific Image Use agreements allowing RTW Programs event participants to opt in to the collection and use of their image by RTW and its partners and collaborating organizations during RTW events.

RTW also supplements this Privacy Policy with specific instructions communicated to RTW Programs participants or beneficiaries, for example, providing participants with instructions on how to change their name in an online training, turning off their camera, etc.

8 Complaints and supervisory authority

If you feel that RTW has processed your personal information incorrectly, you can always contact us at privacy (at) rightstech.org. The federal authority responsible for law enforcement and supervision related to data

privacy in Switzerland is the Federal Data Protection and Information Commissioner (FDPIC), and complaints can also be submitted to them. Contact details for FDPIC are available at the link, <https://www.edoeb.admin.ch/edoeb/en/home/der-edoeb/kontakt.html> and its telephone number is +41 (0)58 462 43 95 (Mon.-Fri., 10-12:00 AM).

9 How to contact RTW

Please contact us at privacy@rightstech.org if you have any questions about our privacy policy or your personal information held by RTW.