

# External Privacy Notice

## (A) This Notice

### Summary – This Notice

This Notice explains how we Process Personal Data. This Notice may be amended or updated from time to time, so please check it regularly for updates.

**This Notice is issued by the International Crisis Group (“Crisis Group”, “we”, “us” and “our”)** and is addressed to individuals outside our organisation with whom we interact, including donators, visitors to our Site, other users of our services, and visitors to our premises (together, “**you**”). Defined terms used in this Notice are explained in Section (R) below.

This Notice may be amended or updated from time to time to reflect changes in our practices with respect to the Processing of Personal Data, or changes in applicable law. We encourage you to read this Notice carefully, and to regularly check this page to review any changes we might make in accordance with the terms of this Notice.

## (B) Collection of Personal Data

### Summary – Collection of Personal Data

We collect or obtain Personal Data: when those data are provided to us (e.g., where you contact us); in the course of our relationship with you (e.g., if you make a donation); when you make Personal Data public; when you visit our Site; when you register for one of our events or other services ; or when you interact with any third party content on a Site. We may also receive Personal Data about you from third parties (e.g., law enforcement authorities and others).

**Collection of Personal Data:** We collect or obtain Personal Data about you from the following sources:

- **Data provided to us:** We may obtain Personal Data when those data are provided to us (e.g., where you contact us via email or telephone, or by any other means, or when you provide us with your business card, or when you submit a job application).
- **Relationship data:** We may collect or obtain Personal Data in the ordinary course of our relationship with you (e.g., if you attend one of our events). We also collect or obtain Personal Data where you choose to make an online donation to us (including your name, billing address, email address, donation amount, whether the donation is made in honour of someone, and the reason for the donation if applicable).
- **Data you make public:** We may collect or obtain Personal Data that you manifestly choose to make public, e.g., if your work is relevant to ours and we want to talk to you about it.
- **Site data:** We may collect or obtain Personal Data when you visit our Site or use any features or resources available on or through our Site.
- **Registration details:** We collect or obtain Personal Data when you register for one of our events or other services.
- **Content information:** If you interact with any third party content on our Site (including third party plugins and cookies) we receive Personal Data from the relevant third party provider of that content.

- **Third party information:** We may collect or obtain Personal Data from third parties who provide it to us (e.g., credit reference agencies; law enforcement authorities; local experts; etc.).
- **Investigation for journalistic purposes:** We may collect or obtain Personal Data as part of our investigations, in compliance with the exception of processing carried out for journalistic purposes.

## (C) Creation of Personal Data

### Summary – Creation of Personal Data

We create Personal Data about you (e.g., records of your interactions with us).

We also create Personal Data about you in certain circumstances, such as records of your interactions with us.

## (D) Categories of Personal Data we Process

### Summary – Categories of Personal Data we may Process

We may Process: your personal details (e.g., your name); demographic data (e.g., your age); your contact details (e.g., your address); records of your consents; payment details (e.g., your billing address); information about our Site (e.g., the type of device you are using); details of your employer (where relevant); information about your interactions with our content; and any views or opinions you provide to us.

We may Process the following categories of Personal Data about you:

- **Personal details:** given name(s); preferred name; and photograph.
- **Demographic information:** gender; date of birth / age; nationality; salutation; title; and language preferences.
- **Contact details:** correspondence address; telephone number; email address; details of Personal Assistants, where applicable; messenger app details; online messaging details; and social media details.
- **Consent records:** records of any consents you have given, together with the date and time, means of consent and any related information (e.g., the subject matter of the consent).
- **Donation details:** records of donations and amount; donor name; email address; reason for donation (where you have provided such reason); whether the donation is made in honour of someone.
- **Payment details:** invoice records; payment records; billing address; payment method; bank account number or credit card number; cardholder or account holder name; card or account security details; card 'valid from' date; card expiry date; BACS details; SWIFT details; IBAN details; payment amount; payment date; and records of cheques.
- **Data relating to our Site:** device type; operating system; browser type; browser settings; IP address; language settings; dates and times of connecting to a Site; location data; page response times; usage data; aggregate statistical information.
- **Employer details:** where you interact with us in your capacity as an employee of a third party, the name, address, telephone number and email address of your employer, to the extent relevant.
- **Content data:** records of your interactions with our online content, records of content displayed on pages displayed to you, and any interaction you may have had with such content (e.g., mouse clicks) and any touchscreen interactions.
- **Views and opinions:** any views and opinions that you choose to send to us, or publicly post about us on social media platforms.

## (E) Sensitive Personal Data

### Summary – Sensitive Personal Data

We do not seek to collect or otherwise Process Sensitive Personal Data. Where we need to Process Sensitive Personal Data for a legitimate purpose, we do so in accordance with applicable law.

We do not routinely collect or otherwise Process Sensitive Personal Data. Where it becomes necessary to Process your Sensitive Personal Data for any other reason, we rely on one of the following legal bases:

- **Compliance with applicable law:** We may Process your Sensitive Personal Data where the Processing is required or permitted by applicable law (e.g., to comply with our data retention obligations);
- **Detection and prevention of crime:** We may Process your Sensitive Personal Data where, in accordance with applicable law, the Processing is necessary for the detection or prevention of crime (e.g., the prevention of fraud);
- **Establishment, exercise or defence of legal rights:** We may Process your Sensitive Personal Data where the Processing is necessary for the establishment, exercise or defence of legal rights;
- **Consent:** We may Process your Sensitive Personal Data where we have, in accordance with applicable law, obtained your prior, express consent prior to Processing your Sensitive Personal Data (this legal basis is only used in relation to Processing that is entirely voluntary – it is not used for Processing that is necessary or obligatory in any way);
- **Data you make public:** We may Process Sensitive Personal Data that you manifestly choose to make public; or
- **Public interest:** We may Process your Sensitive Personal Data where doing so is necessary for reasons of substantial public interest, on the basis of European or national law

## (F) Purposes of Processing and legal bases for Processing

### Summary – Purposes of Processing and legal bases for Processing

We Process Personal Data for the following purposes: providing our Site and services to you; operating our organisation; communicating with you; managing our IT systems; health and safety; financial management; conducting surveys; ensuring the security of our premises and systems; conducting investigations where necessary; compliance with applicable law; improving our Site and services; and recruitment and job applications.

The purposes for which we Process Personal Data, subject to applicable law, and the legal bases on which we perform such Processing, are as follows:

Processing activity	Legal basis for Processing
<p><b>Provision of Site, and services:</b> providing our Site, services; providing promotional items upon request; and communicating with you in relation to those Site, or services.</p>	<ul style="list-style-type: none"> <li>• The Processing is <b>necessary in connection with any contract</b> that you have entered into with us, or to take steps prior to entering into a contract with us; or</li> <li>• We have a <b>legitimate interest</b> in carrying out the Processing for the purpose of providing our services (to the extent that such legitimate interest is not overridden by your interests, fundamental rights, or freedoms); or</li> <li>• We have obtained <b>your prior consent</b> to the Processing (this legal basis is only used in relation to Processing that is entirely voluntary – it is not used for Processing that is necessary or obligatory in any way).</li> </ul>
<p><b>Operating our organisation:</b> operating and managing our Site, and our services; providing content to you; displaying information to you; communicating and interacting with you via our Site, or our services; and notifying you of changes to any of our Site, or our services.</p>	<ul style="list-style-type: none"> <li>• The Processing is <b>necessary in connection with any contract</b> that you have entered into with us, or to take steps prior to entering into a contract with us; or</li> <li>• We have a <b>legitimate interest</b> in carrying out the Processing for the purpose of providing our Site, or our services to you (to the extent that such legitimate interest is not overridden by your interests, fundamental rights, or freedoms); or</li> <li>• We have obtained <b>your prior consent</b> to the Processing (this legal basis is only used in relation to Processing that is entirely voluntary – it is not used for Processing that is necessary or obligatory in any way).</li> </ul>
<p><b>Communications and marketing:</b> communicating with you via any means (including via email, telephone, text message, social media, post or in person) news items and other information in which you may be interested, subject always to obtaining your prior opt-in consent to the extent required under applicable law; maintaining and updating your contact information where appropriate; and obtaining your prior, opt-in consent where required.</p>	<ul style="list-style-type: none"> <li>• The Processing is <b>necessary in connection with any contract</b> that you have entered into with us, or to take steps prior to entering into a contract with us; or</li> <li>• We have a <b>legitimate interest</b> in carrying out the Processing for the purpose of contacting you, subject always to compliance with applicable law (to the extent that such legitimate interest is not overridden by your interests, fundamental rights, or freedoms); or</li> <li>• We have obtained <b>your prior consent</b> to the Processing (this legal basis is only used in relation to Processing that is entirely voluntary – it is not used for Processing that is necessary or obligatory in any way).</li> </ul>
<p><b>Management of IT systems:</b> management and operation of our communications, IT and security systems; and audits (including security audits) and monitoring of such systems.</p>	<ul style="list-style-type: none"> <li>• The Processing is necessary for <b>compliance with a legal obligation</b>; or</li> <li>• We have a <b>legitimate interest</b> in carrying out the Processing for the purpose of managing and maintaining our communications and IT systems (to the extent that such legitimate interest is not overridden by your interests, fundamental rights, or freedoms).</li> </ul>
<p><b>Health and safety:</b> health and safety assessments and record keeping; providing a safe and secure environment at our premises; and compliance with related legal obligations.</p>	<ul style="list-style-type: none"> <li>• The Processing is necessary for <b>compliance with a legal obligation</b>; or</li> <li>• We have a <b>legitimate interest</b> in carrying out the Processing for the purpose of managing and maintaining our communications and IT systems (to the extent that such legitimate interest is not overridden by your interests, fundamental rights, or freedoms); or</li> <li>• The Processing is necessary to protect the <b>vital interests</b> of any individual.</li> </ul>

Processing activity	Legal basis for Processing
<p><b>Financial management:</b> finance; corporate audit; and vendor management.</p>	<ul style="list-style-type: none"> <li>• We have a <b>legitimate interest</b> in carrying out the Processing for the purpose of managing and operating our financial affairs (to the extent that such legitimate interest is not overridden by your interests, fundamental rights, or freedoms); or</li> <li>• We have obtained <b>your prior consent</b> to the Processing (this legal basis is only used in relation to Processing that is entirely voluntary – it is not used for Processing that is necessary or obligatory in any way).</li> </ul>
<p><b>Surveys:</b> engaging with you for the purposes of obtaining your views on our Site, or our services.</p>	<ul style="list-style-type: none"> <li>• We have a <b>legitimate interest</b> in carrying out the Processing for the purpose of conducting surveys, satisfaction reports and market research (to the extent that such legitimate interest is not overridden by your interests, fundamental rights, or freedoms); or</li> <li>• We have obtained <b>your prior consent</b> to the Processing (this legal basis is only used in relation to Processing that is entirely voluntary – it is not used for Processing that is necessary or obligatory in any way).</li> </ul>
<p><b>Security:</b> physical security of our premises (including records of visits to our premises); CCTV recordings; and electronic security (including login records and access details).</p>	<ul style="list-style-type: none"> <li>• The Processing is necessary for <b>compliance with a legal obligation</b>; or</li> <li>• We have a <b>legitimate interest</b> in carrying out the Processing for the purpose of ensuring the physical and electronic security of our organisation and our premises (to the extent that such legitimate interest is not overridden by your interests, fundamental rights, or freedoms).</li> </ul>
<p><b>Investigations:</b> detecting, investigating and preventing breaches of policy, and criminal offences, in accordance with applicable law.</p>	<ul style="list-style-type: none"> <li>• The Processing is necessary for <b>compliance with a legal obligation</b>; or</li> <li>• We have a <b>legitimate interest</b> in carrying out the Processing for the purpose of detecting, and protecting against, breaches of our policies and applicable laws (to the extent that such legitimate interest is not overridden by your interests, fundamental rights, or freedoms).</li> </ul>
<p>Legal proceedings: establishing, exercising and defending legal rights.</p>	<ul style="list-style-type: none"> <li>• The Processing is necessary for <b>compliance with a legal obligation</b>; or</li> <li>• We have a <b>legitimate interest</b> in carrying out the Processing for the purpose of establishing, exercising or defending our legal rights (to the extent that such legitimate interest is not overridden by your interests, fundamental rights, or freedoms).</li> </ul>
<p><b>Legal compliance:</b> compliance with our legal and regulatory obligations under applicable law.</p>	<ul style="list-style-type: none"> <li>• The Processing is <b>necessary for compliance with a legal obligation</b>.</li> </ul>
<p><b>Improving our Site, and services:</b> identifying issues with our Site, or our services; planning improvements to our Site, or our services; and creating new Sites, or services.</p>	<ul style="list-style-type: none"> <li>• We have a <b>legitimate interest</b> in carrying out the Processing for the purpose of improving our Site, or our services (to the extent that such legitimate interest is not overridden by your interests, fundamental rights, or freedoms); or</li> <li>• We have obtained <b>your prior consent</b> to the Processing (this legal basis is only used in relation to Processing that is entirely voluntary – it is not used for Processing that is necessary or obligatory in any way).</li> </ul>

Processing activity	Legal basis for Processing
<p><b>Recruitment and job applications:</b> recruitment activities; advertising of positions; interview activities; analysis of suitability for the relevant position; records of hiring decisions; offer details; and acceptance details.</p>	<ul style="list-style-type: none"> <li>• The Processing is necessary for <b>compliance with a legal obligation</b> (especially in respect of applicable employment law); or</li> <li>• We have a <b>legitimate interest</b> in carrying out the Processing for the purpose of recruitment activities and handling job applications (to the extent that such legitimate interest is not overridden by your interests, fundamental rights, or freedoms); or</li> <li>• We have obtained <b>your prior consent</b> to the Processing (this legal basis is only used in relation to Processing that is entirely voluntary – it is not used for Processing that is necessary or obligatory in any way).</li> </ul>

### (G) Disclosure of Personal Data to third parties

#### Summary – Disclosure of Personal Data to third parties

We disclose Personal Data to: legal and regulatory authorities; our external advisors; our Processors; any party as necessary in connection with legal proceedings; any party as necessary for investigating, detecting or preventing criminal offences; any acquirer of our organisation; parties that provide services to help maintain our Site; and any third party providers of plugins or content used on our Site.

We disclose Personal Data to other entities within the Crisis Group, for legitimate purposes and the operation of our Site, or services to you), in accordance with applicable law. In addition, we disclose your Personal Data to:

- you and, where appropriate, your appointed representatives;
- legal and regulatory authorities, upon request, or for the purposes of reporting any actual or suspected breach of applicable law or regulation;
- accountants, auditors, lawyers and other outside professional advisors to Crisis Group, subject to binding contractual obligations of confidentiality;
- third party Processors located anywhere in the world, subject to the requirements noted below in this Section (G). +For example, if you apply for career opportunities with Crisis Group, Personal Data you provide will be collected through [Recruitee](#). If you register for our email newsletter, Personal Data you provide will be collected by [Mailchimp](#). Where you make an online donation, your Personal Data will be collected by [Raiser’s Edge NXT](#);
- any relevant party, law enforcement agency or court, to the extent necessary for the establishment, exercise or defence of legal rights;
- any relevant party for the purposes of prevention, investigation, detection or prosecution of criminal offences or the execution of criminal penalties;
- any relevant third party acquirer(s), in the event that we sell or transfer all or any relevant portion of our organisation or assets (including in the event of a reorganization, dissolution or liquidation); and
- any relevant third party provider, where our Site use third party plugins or content. If you choose to interact with any such plugins or content, your Personal Data may be shared with the relevant third party provider. We recommend that you review that third party’s privacy policy before interacting with it.

If we engage a third-party Processor to Process your Personal Data, the Processor will be subject to binding contractual obligations to: (i) only Process the Personal Data in accordance with our prior written instructions; and (ii) use measures to protect the confidentiality and security of the Personal Data; together with any additional requirements under applicable law.



## (H) International transfer of Personal Data

### Summary – International transfer of Personal Data

We transfer Personal Data to recipients in other countries. Where we transfer Personal Data from the EEA to a recipient outside the EEA that is not in an Adequate Jurisdiction, we do so on the basis of Standard Contractual Clauses.

Because of the international nature of our business, we transfer Personal Data within the Crisis Group, and to third parties as noted in Section (G) above, in connection with the purposes set out in this Notice. For this reason, we transfer Personal Data to other countries that may have different laws and data protection compliance requirements to those that apply in the country in which you are located.

Where we transfer your Personal Data from the EEA to recipients located outside the EEA who are not in Adequate Jurisdictions, we do so on the basis of Standard Contractual Clauses. You are entitled to request a copy of our Standard Contractual Clauses using the contact details provided in Section (Q) below.

Please note that when you transfer any Personal Data directly to a Crisis Group entity established outside the EEA, we are not responsible for that transfer of your Personal Data. We will nevertheless Process your Personal Data, from the point at which we receive those data, in accordance with the provisions of this Notice.

## (I) Data security

### Summary – Data security

We implement appropriate technical and organisational security measures to protect your Personal Data. Please ensure that any Personal Data that you send to us are sent securely.

We have implemented appropriate technical and organisational security measures designed to protect your Personal Data against accidental or unlawful destruction, loss, alteration, unauthorised disclosure, unauthorised access, and other unlawful or unauthorised forms of Processing, in accordance with applicable law.

Because the internet is an open system, the transmission of information via the internet is not completely secure. Although we will implement all reasonable measures to protect your Personal Data, we cannot guarantee the security of your data transmitted to us using the internet – any such transmission is at your own risk and you are responsible for ensuring that any Personal Data that you send to us are sent securely.

## (J) Data accuracy

### Summary – Data accuracy

We take reasonable steps to ensure that your Personal Data are kept accurate and up-to-date and are erased or rectified if we become aware of inaccuracies.

We take reasonable steps to ensure that:

- your Personal Data that we Process are accurate and, where necessary, kept up to date; and
- any of your Personal Data that we Process that are inaccurate (having regard to the purposes for which they are Processed) are erased or rectified without delay.

From time to time we may ask you to confirm the accuracy of your Personal Data.

## (K) Data minimisation

### Summary – Data minimisation

We take reasonable steps to limit the volume of your Personal Data that we Process to what is necessary.

We take reasonable steps to ensure that your Personal Data that we Process are limited to the Personal Data reasonably necessary in connection with the purposes set out in this Notice.

## (L) Data retention

### Summary – Data retention

We take reasonable steps to ensure that your Personal Data are only retained for as long as they are needed in connection with a lawful purpose.

We take reasonable steps to ensure that your Personal Data are only Processed for the minimum period necessary for the purposes set out in this Notice. The criteria for determining the duration for which we will retain your Personal Data are as follows:

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(1) we will retain Personal Data in a form that permits identification only for as long as:

- (a) we maintain an ongoing relationship with you (e.g., where you are a user of our services, or you are lawfully included in our mailing list and have not unsubscribed); or
- (b) your Personal Data are necessary in connection with the lawful purposes set out in this Notice, for which we have a valid legal basis (e.g., where you choose to submit your personal data to us for inclusion on a mailing list and we have a legitimate interest in processing those data for the purposes of operating our organisation and providing our Site, or our services to you (to the extent that such legitimate interest is not overridden by your interests, fundamental rights, or freedoms); or where we have a legal obligation to retain your Personal Data),

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**plus:**

(2) the duration of:

- (a) any applicable limitation period under applicable law (i.e., any period during which any person could bring a legal claim against us in connection with your Personal Data, or to which your Personal Data are relevant); and
- (b) an additional two (2) month period following the end of such applicable limitation period (so that, if a person brings a claim at the end of the limitation period, we are still afforded a reasonable amount of time in which to identify any Personal Data that are relevant to that claim),

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**and:**

(3) in addition, if any relevant legal claims are brought, we continue to Process Personal Data for such additional periods as are necessary in connection with that claim.

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During the periods noted in paragraphs (2)(a) and (2)(b) above, we will restrict our Processing of your Personal Data to storage of, and maintaining the security of, those data, except to the extent that those data need to be reviewed in connection with any legal claim, or any obligation under applicable law.

Once the periods in paragraphs (1), (2) and (3) above, each to the extent applicable, have concluded, we will either:

- permanently delete or destroy the relevant Personal Data; or
- anonymize the relevant Personal Data.



## (D) Your legal rights

### Summary – Your legal rights

Subject to applicable law, you may have a number of rights, including: the right not to provide your Personal Data to us; the right of access to your Personal Data; the right to request rectification of inaccuracies; the right to request the erasure, or restriction of Processing, of your Personal Data; the right to object to the Processing of your Personal Data; the right to have your Personal Data transferred to another Controller; the right to withdraw consent; and the right to lodge complaints with Data Protection Authorities. In some cases it will be necessary to provide evidence of your identity before we can give effect to these rights.

Subject to applicable law, you may have the following rights regarding the Processing of your Relevant Personal Data:

the right not to provide your Personal Data to us (however, please note that we will be unable to provide you with the full benefit of our Site, or services, if you do not provide us with your Personal Data – e.g., we might not be able to process your requests without the necessary details);

- the right to request access to, or copies of, your Relevant Personal Data, together with information regarding the nature, Processing and disclosure of those Relevant Personal Data;
- the right to request rectification of any inaccuracies in your Relevant Personal Data;
- the right to request, on legitimate grounds:
  - erasure of your Relevant Personal Data; or
  - restriction of Processing of your Relevant Personal Data;
- the right to have certain Relevant Personal Data transferred to another Controller, in a structured, commonly used and machine-readable format, to the extent applicable;
- where we Process your Relevant Personal Data on the basis of your consent, the right to withdraw that consent (noting that such withdrawal does not affect the lawfulness of any Processing performed prior to the date on which we receive notice of such withdrawal, and does not prevent the Processing of your Personal Data in reliance upon any other available legal bases); and
- the right to lodge complaints regarding the Processing of your Relevant Personal Data with a Data Protection Authority (in particular, the Data Protection Authority of the EU Member State in which you live, or in which you work, or in which the alleged infringement occurred, each if applicable).

Subject to applicable law, you may also have the following additional rights regarding the Processing of your Relevant Personal Data:

- the right to object, on grounds relating to your particular situation, to the Processing of your Relevant Personal Data by us or on our behalf; and
- the right to object to the Processing of your Relevant Personal Data by us or on our behalf for direct marketing purposes.

This does not affect your statutory rights.

To exercise one or more of these rights, or to ask a question about these rights or any other provision of this Notice, or about our Processing of your Personal Data, please use the contact details provided in Section (Q) below. Please note that:

- in some cases it will be necessary to provide evidence of your identity before we can give effect to these rights; and
- where your request requires the establishment of additional facts (e.g., a determination of whether any Processing is non-compliant with applicable law) we will investigate your request reasonably promptly, before deciding what action to take.

## (E) Cookies and similar technologies

### Summary – Cookies and similar technologies

We Process Personal Data by using Cookies and similar technologies. For more information, please see our [Cookie Policy](#)

When you visit our Site we will typically place Cookies onto your device, or read Cookies already on your device, subject always to obtaining your consent, where required, in accordance with applicable law. We use Cookies to record information about your device, your browser and, in some cases, your preferences and browsing habits. We Process Personal Data through Cookies and similar technologies, in accordance with our [Cookie Policy](#)

## (F) Terms of Use

### Summary – Terms of Use

Our [Terms of Use](#) govern all use of our Site, and our services.

All use of our Site, or services is subject to our [Terms of Use](#) We recommend that you review our Terms of Use regularly, in order to review any changes we might make from time to time.

## (G) Direct marketing

### Summary – Direct marketing

We Process Personal Data to contact you with information regarding our Site, or our services that may be of interest to you. You may unsubscribe for free at any time.

We Process Personal Data to contact you via email, telephone, direct mail or other communication formats to provide you with information regarding our Site, our work or services that may be of interest to you. If we provide our Site, or our services to you, we may send information to you regarding our Site, or our services, upcoming promotions and other information that may be of interest to you, using the contact details that you have provided to us, subject always to obtaining your prior opt-in consent to the extent required under applicable law.

You may unsubscribe from our promotional email list at any time by simply clicking on the unsubscribe link included in every promotional email we send. After you unsubscribe, we will not send you further promotional emails, but in some circumstances we will continue to contact you to the extent necessary for the purposes of our Site, or our services you have requested.

## (H) Details of Controllers

### Summary – Details of Controllers

There are several Crisis Group entities that act as Controllers for the purposes of this Privacy Notice.

For the purposes of this Notice, the relevant Controllers are:

### Controller entity

Crisis Group (Belgium office)	Crisis Group (UK office)
Crisis Group (New York Office)	Crisis Group (Washington, D.C. office)

Alternatively, you may contact them through our [Online Communications Manager](#).

## (I) Definitions

“**Adequate Jurisdiction**” means a jurisdiction that has been formally designated by the European Commission as providing an adequate level of protection for Personal Data.

“**Cookie**” means a small file that is placed on your device when you visit a website (including our Sites). In this Notice, a reference to a “Cookie” includes analogous technologies such as web beacons and clear GIFs.

“**Controller**” means the entity that decides how and why Personal Data are Processed. In many jurisdictions, the Controller has primary responsibility for complying with applicable data protection laws.

“**Data Protection Authority**” means an independent public authority that is legally tasked with overseeing compliance with applicable data protection laws.

“**EEA**” means the European Economic Area.

“**Personal Data**” means information that is about any individual, or from which any individual is directly or indirectly identifiable, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that individual.

“**Process**”, “**Processing**” or “**Processed**” means anything that is done with any Personal Data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

“**Processor**” means any person or entity that Processes Personal Data on behalf of the Controller (other than employees of the Controller).

“**Relevant Personal Data**” means Personal Data in respect of which we are the Controller.

“**Sensitive Personal Data**” means Personal Data about race or ethnicity, political opinions, religious or philosophical beliefs, trade union membership, physical or mental health, sexual life, any actual or alleged criminal offences or penalties, national identification number, or any other information that are deemed to be sensitive under applicable law.

“**Standard Contractual Clauses**” means template transfer clauses adopted by the European Commission or adopted by a Data Protection Authority and approved by the European Commission.

“**Site**” means any website operated, or maintained, by us or on our behalf.

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