



## Data protection policy

### Goal of the data protection policy

The goal of the data protection policy is to depict the legal data protection aspects in one summarising document. It can also be used as the basis for statutory data protection inspections, e.g. by the customer within the scope of commissioned processing. This is not only to ensure compliance with the European General Data Protection Regulation (GDPR) but also to provide proof of compliance.

### Preamble

The Global Impact Institute (GII) is an organisation working for ministries, transnational agencies and higher education institutions as well as companies and foundations. It focuses on the issues of internationalisation and impact. An important part of our work is the use of online surveys to generate usually anonymised data for analytical purposes. This is why we set up this policy in order to comply with data protection.

### Security policy and responsibilities in the company

We at the GII adhere to the highest standards of data protection. This means we only collect data which is needed for the respective purpose, avoid to collect personal data as much as possible, make identification of individuals as impossible as possible and delete data when it is no longer needed and the deletion is in accordings with both the contracts signed with respect to the project for which the data was collected and the laws governing the project.

The company is represented and operated by Uwe Brandenburg, PhD. He is also in charge of the data collection and analysis. Should any other member of the GII need to work with data collected by the GII, the information is suitably anonymised.

The GII is committed to continuous improvement of its data protection management system. Training, sensitisation and obligation of the GII staff is relevant and looked after.

### Legal framework in the company

The GII acts under Czech law and all respective regulations apply.

### Documentation

Internal inspections are conducted regularly on an at least yearly basis. External inspections are conducted when necessary and required by law.

The data protection need is determined - with regard to confidentiality, integrity and availability – according to the BSI Standard 100-2 categories from the German Federal Office for Information Security [*Bundesamt für Sicherheit in der Informationstechnik – BSI*] as 'normal'.

### Existing technical and organisational measures (TOM)

Appropriate technical and organisational measures are implemented and substantiated, taking into account, inter alia, the purpose of the processing, the state of the technology and the implementation costs.

The description of the implemented TOM is broadly on the structure of ISO/IEC 27002, taking into account ISO/IEC 29151 (guidelines for the protection of personal data):

Guideline for the rights of data subjects are outlined in this document.

Access control is regulated by the Managing Director of the GII exclusively, personal data of GII members is only disclosed to authorities or other parties if this is necessary to obey to Czech laws and regulations (e.g. taxation).

Information classification (and handling thereof) is also under the control of the Managing Director.

Physical and environmental-related security for end users are not applicable (relating to Guideline for information transfer based on the work environment and screen locks, mobile devices and telecommuting, restriction of software installation and use) since the GII does not provide staff members with devices of any kind except for the Managing Director.

Permissible use of values is always restricted to the project in and for which the data has been collected.

Data backup is guaranteed through the regular use of an external backup drive and the continuous automatic storage on the Apple Cloud.

Information transfer is restricted to the needs as specified in each individual project contract.

Protection against malware is guaranteed through the implementation of Bitdefender for the Macbook and Avira for the mobile device, all other data is protected through the Apple Cloud. Furthermore, data on the mobile device(s) is protected through passwords and fingerprint access.

Handling technical weak points are not relevant for the GII. Cryptographic measures are not needed due to the type of work of the GII.

Communication security is ensured by using standardised software (MS Office, Outlook, Apple Mail).

Privacy and protection of personal information is ensured through the procedures laid out in this document. Contracts of GII members are stored on the Cloud as pdf as well as a printed version in a locked environment to whom only the Managing Director has access.

Supplier relationships: the GII works only with companies such as Zoho, Google, Wordpress who have standardised regular inspections and evaluations of data processing, especially regarding the efficacy of the implemented technical and organisational measures implemented. Since only with Zoho actual data would be generated by implementing online surveys, a special data protection agreement has been signed. Typically, even in these surveys no personal data that would allow to identify an individual would be collected.

Due to the small size of the GII, further inspections are neither deemed necessary nor realisable.

## Privacy policy

### 1. Introduction

- 1.1 We are committed to safeguarding the privacy of our website visitors and service users.
- 1.2 This policy applies where we are acting as a data controller with respect to the personal data of our website visitors and service users; in other words, where we determine the purposes and means of the processing of that personal data.
- 1.3 We do not use cookies on our website other than those described below in the respective section.
- 1.4 Our website and any surveys that ask for personal data incorporate privacy controls which affect how we will process your personal data. By using the privacy controls, you actively agree to provide data and you are informed about the purpose of its use. In case of surveys, each privacy control is attached to the specific survey as a separate question that needs your active agreement in order to proceed with a survey. In case of the website, we use the WP GDPR Compliance plugin to ensure that the contact form as well as the comment function uses the GDPR compliant formulations, but usually contact form and comments are switched off in order to minimize the risk of unnecessary data collection.
- 1.5 In this policy, "we", "us" and "our" refer to the Global Impact Institute and its Managing Director, Dr. Uwe Brandenburg. For more information about us, see Section 13.

### 2. Credit

- 2.1 This document was created using a template from SEQ Legal (<https://seqlegal.com>).

### 3. How we use your personal data

- 3.1 In this Section 3 we have set out:
  - (a) the general categories of personal data that we may process;
  - (b) in the case of personal data that we did not obtain directly from you, the source and specific categories of that data;
  - (c) the purposes for which we may process personal data; and
  - (d) the legal bases of the processing.
- 3.2 We may in the future process data about your use of our website ("**usage data**"). The usage data may include your IP address, geographical location, browser type and version, operating system, referral source, length of visit, page views and website navigation paths, as well as information about the timing, frequency and pattern of your visit. The source of the usage data is our analytics tracking system, GoogleAnalytics. The Data Processing Amendment (GDPR compliance) for this account was accepted on 14 March 2018. This usage data may be processed for the purposes of analysing the use of the website. The legal basis for this processing is our legitimate interests, namely monitoring and improving our website and services. **However, GII has deactivated any google analytics or other plugins for analysis of user data.**
- 3.3 We may process other personal data through online surveys ("**survey data**"). Such surveys are setup for a specific task which is always specified at the beginning of the survey. They also actively ask for your general consent of participation. The data may be processed for the legitimate interests and purposes of the specific project for which they were collected and not for any other purpose. The legal basis for this processing is the performance of a contract between us and a client.
- 3.4 We may process your personal data that are provided in the course of the use of our services ("**service data**"). The service data may include your email address or other information such as gender or educational background. The source of the service data is you. The service data may be processed for providing our services. The legal basis for this processing is the performance of a contract between our client and us.

- 3.5 We may process information contained in any enquiry you submit to us regarding services ("**enquiry data**"). The enquiry data may be processed for the purposes of offering, marketing and selling relevant services to you. The legal basis for this processing is consent.
- 3.6 We may process information that you provide to us for the purpose of subscribing to our email notifications and/or newsletters ("**notification data**"). The notification data may be processed for the purposes of sending you the relevant notifications and/or newsletters. The legal basis for this processing is consent.
- 3.10 We may process information contained in or relating to any communication that you send to us ("**correspondence data**"). The correspondence data may include the communication content and metadata associated with the communication. Our website will generate the metadata associated with communications made using the website contact forms. The correspondence data may be processed for the purposes of communicating with you and record-keeping. The legal basis for this processing is our legitimate interests, namely the proper administration of our website and business and communications with users.
- 3.12 We may process any of your personal data identified in this policy where necessary for the establishment, exercise or defence of legal claims, whether in court proceedings or in an administrative or out-of-court procedure. The legal basis for this processing is our legitimate interests, namely the protection and assertion of our legal rights, your legal rights and the legal rights of others.
- 3.13 We may process any of your personal data identified in this policy where necessary for the purposes of obtaining or maintaining insurance coverage, managing risks, or obtaining professional advice. The legal basis for this processing is our legitimate interests, namely the proper protection of our business against risks.
- 3.14 In addition to the specific purposes for which we may process your personal data set out in this Section 3, we may also process [any of your personal data] where such processing is necessaryw for compliance with a legal obligation to which we are subject, or] in order to protect your vital interests or the vital interests of another natural person.
- 3.15 Please do not supply any other person's personal data to us, unless we prompt you to do so.

#### **4. Providing your personal data to others**

- 4.1 We may disclose your personal data to any member of our Global Impact Institute insofar as reasonably necessary for the purposes, and on the legal bases, set out in this policy.
- 4.2 We may disclose your personal data to our insurers and/or professional advisers insofar as reasonably necessary for the purposes of obtaining or maintaining insurance coverage, managing risks, obtaining professional advice, or the establishment, exercise or defence of legal claims, whether in court proceedings or in an administrative or out-of-court procedure.
- 4.3 We may disclose project specific data, which in each case will then be identified, to our suppliers or subcontractors, which will then again be identified at [http://www.globalimpactinstitute.eu/current\\_projects/](http://www.globalimpactinstitute.eu/current_projects/) insofar as reasonably necessary for tasks regulated in the individual contract. In such cases, you will be informed in the course of the data collection about the scope and type of data that we collect from you and the purpose for which it will be used.
- 4.4 In addition to the specific disclosures of personal data set out in this Section 4, we may disclose your personal data where such disclosure is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person. We may also disclose your personal data where such disclosure is necessary for the establishment, exercise or defence of legal claims, whether in court proceedings or in an administrative or out-of-court procedure.

#### **5. International transfers of your personal data**

- 5.1 In this Section 5, we provide information about the circumstances in which your personal data may be transferred to countries outside the European Economic Area (EEA).

- 5.2 We currently have members of the Global Impact Institute outside the EEA in Japan, Australia, Singapore, and Canada. The European Commission has made an "adequacy decision" with respect to the data protection laws of each of these countries. Transfers to each of these countries, if necessary at all, will be protected by appropriate safeguards, namely the use of standard data protection clauses adopted or approved by the European Commission, a copy of which can be obtained from [https://ec.europa.eu/info/law/law-topic/data-protection/data-transfers-outside-eu\\_en](https://ec.europa.eu/info/law/law-topic/data-protection/data-transfers-outside-eu_en).
- 5.3 The hosting facilities for our website are situated in the Czech Republic, so no specific regulations need to be applied in this case.
- 5.4 You acknowledge that personal data that you submit for publication through our website or services may be available, via the internet, around the world. We cannot prevent the use (or misuse) of such personal data by others.
- 6. Retaining and deleting personal data**
- 6.1 This Section 6 sets out our data retention policies and procedure, which are designed to help ensure that we comply with our legal obligations in relation to the retention and deletion of personal data.
- 6.2 Personal data that we process for any purpose or purposes shall not be kept for longer than is necessary for that purpose or those purposes.
- 6.3 We will retain your personal data as follows:
- (a) Website: Personal data as defined in Art. 4.1 GDPR ('personal data' means any information relating to an identified or identifiable natural person ('data subject'); an identifiable natural person is one who can be identified, directly or indirectly, 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 natural person) is currently not retained, as any analytics plugin has been deactivated. If it would be retained in the future, it would be retained regarding website statistics for a minimum period of 30 days following the date of visit, and for a maximum period of 365 days following the date of visit.
  - (b) Surveys and other data collection procedures during projects: Personal data as defined in Art. 4.1 GDPR ('personal data' means any information relating to an identified or identifiable natural person ('data subject'); an identifiable natural person is one who can be identified, directly or indirectly, 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 natural person) is usually not collected through surveys and other data collection procedures in the course of a project. Should this be the case in an exceptional project, the respective data will be retained for a minimum period of 30 days following the date of collection, and for a maximum period defined by the regulations of the contract with the client and possible audit regulations, e.g. in case of projects for the European Union, data has to be kept for a minimum of 5 years following the date of the end of a project.
  - (c) Research projects: Personal data as defined in Art. 4.1 GDPR ('personal data' means any information relating to an identified or identifiable natural person ('data subject'); an identifiable natural person is one who can be identified, directly or indirectly, 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 natural person) is usually not collected. In exceptional cases, where this should be the case, such data will be retained according to the regulations of the university for which this research is being conducted.
- 6.4 In some cases it is not possible for us to specify in advance the periods for which your personal data will be retained. In such cases, we will determine the period of retention based on the following criteria:

- (a) the period of retention of personal data as defined in Art. 4.1 GDPR will be determined based on the need to comply with the needs as specified in Section 4. of this document.

6.5 Notwithstanding the other provisions of this Section 6, we may retain your personal data where such retention is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person.

## 7. Amendments

- 7.1 We may update this policy from time to time by publishing a new version on our website.
- 7.2 You should check this page occasionally to ensure you are happy with any changes to this policy.
- 7.3 We may notify you of changes to this policy through public messages on our website.

## 8. Your rights

8.1 You may instruct us to provide you with any personal information we hold about you; provision of such information will be subject to:

- (a) the payment of a fee (currently fixed at EUR 30); and
- (b) the supply of appropriate evidence of your identity (for this purpose, we will usually accept a photocopy of your passport certified by a solicitor or bank plus an original copy of a utility bill showing your current address).

8.2 We may withhold personal information that you request to the extent permitted by law.

8.3 You may instruct us at any time not to process your personal information for marketing purposes.

8.4 In practice, you will usually either expressly agree in advance to our use of your personal information for marketing purposes, or we will provide you with an opportunity to opt out of the use of your personal information for marketing purposes.

8.5 Your principal rights under data protection law are:

- (a) the right to access;
- (b) the right to rectification;
- (c) the right to erasure;
- (d) the right to restrict processing;
- (e) the right to object to processing;
- (f) the right to data portability;
- (g) the right to complain to a supervisory authority; and
- (h) the right to withdraw consent.

8.6 You have the right to have any inaccurate personal data about you rectified and, taking into account the purposes of the processing, to have any incomplete personal data about you completed.

8.7 In some circumstances you have the right to the erasure of your personal data without undue delay. Those circumstances include: the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed; you withdraw consent to consent-based processing; you object to the processing under certain rules of applicable data protection law; the processing is for direct marketing purposes; and the personal data have been unlawfully processed. However, there are exclusions of the right to erasure. The general exclusions include where processing is necessary: for exercising the right of freedom of expression and information; for compliance with a legal obligation; or for the establishment, exercise or defence of legal claims.

- 8.8 In some circumstances you have the right to restrict the processing of your personal data. Those circumstances are: you contest the accuracy of the personal data; processing is unlawful but you oppose erasure; we no longer need the personal data for the purposes of our processing, but you require personal data for the establishment, exercise or defence of legal claims; and you have objected to processing, pending the verification of that objection. Where processing has been restricted on this basis, we may continue to store your personal data. However, we will only otherwise process it: with your consent; for the establishment, exercise or defence of legal claims; for the protection of the rights of another natural or legal person; or for reasons of important public interest.
- 8.9 You have the right to object to our processing of your personal data on grounds relating to your particular situation, but only to the extent that the legal basis for the processing is that the processing is necessary for: the performance of a task carried out in the public interest or in the exercise of any official authority vested in us; or the purposes of the legitimate interests pursued by us or by a third party. If you make such an objection, we will cease to process the personal information unless we can demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms, or the processing is for the establishment, exercise or defence of legal claims.
- 8.10 You have the right to object to our processing of your personal data for direct marketing purposes (including profiling for direct marketing purposes). If you make such an objection, we will cease to process your personal data for this purpose.
- 8.11 You have the right to object to our processing of your personal data for scientific or historical research purposes or statistical purposes on grounds relating to your particular situation, unless the processing is necessary for the performance of a task carried out for reasons of public interest.
- 8.12 To the extent that the legal basis for our processing of your personal data is:
- (a) consent; or
  - (b) that the processing is necessary for the performance of a contract to which you are party or in order to take steps at your request prior to entering into a contract,
- and such processing is carried out by automated means, you have the right to receive your personal data from us in a structured, commonly used and machine-readable format. However, this right does not apply where it would adversely affect the rights and freedoms of others. We will also charge a reasonable fee to provide any such report.
- 8.13 If you consider that our processing of your personal information infringes data protection laws, you have a legal right to lodge a complaint with a supervisory authority responsible for data protection. You may do so in the EU member state of your habitual residence, your place of work or the place of the alleged infringement.
- 8.14 To the extent that the legal basis for our processing of your personal information is consent, you have the right to withdraw that consent at any time. Withdrawal will not affect the lawfulness of processing before the withdrawal.
- 8.15 You may exercise any of your rights in relation to your personal data by written notice to us in addition to the other methods specified in this Section 8.

## 9. About cookies

- 9.1 A cookie is a file containing an identifier (a string of letters and numbers) that is sent by a web server to a web browser and is stored by the browser. The identifier is then sent back to the server each time the browser requests a page from the server.
- 9.2 Cookies may be either "persistent" cookies or "session" cookies: a persistent cookie will be stored by a web browser and will remain valid until its set expiry date, unless deleted by the user before the expiry date; a session cookie, on the other hand, will expire at the end of the user session, when the web browser is closed.

- 9.3 Cookies do not typically contain any information that personally identifies a user, but personal information that we store about you may be linked to the information stored in and obtained from cookies.

## 10. Cookies that we use

- 10.1 We currently deactivated any user analytics plugins of our website. Should those be activated, we would use cookies for the following purposes:

- (a) authentication - we use cookies to identify you when you visit our website and as you navigate our website (cookies used for this purpose are: `_ga`, `_gat`, `_git`);
- (b) [analysis - we use cookies to help us to analyse the use and performance of our website and services (cookies used for this purpose are: `_ga`, `_gat`, `_git`).

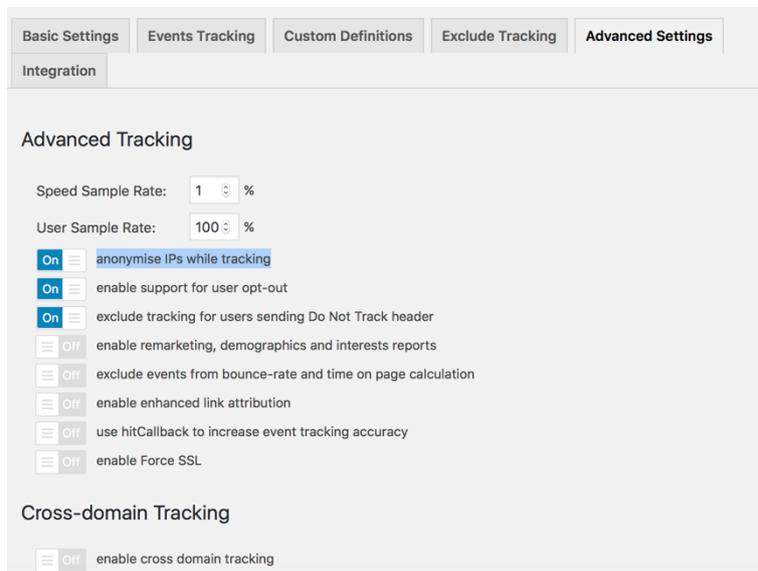
## 11. Cookies used by our service providers

- 11.1 We use Wordpress to generate our website. You can view the privacy policy of this service provider at <https://wordpress.org/about/privacy/>. Service provider Wordpress does not use sessions by default (<https://premium.wpmudev.org/blog/set-get-delete-cookies/>) and uses a cookie for login of administrators, not users.

- 11.2 We currently do not use Google Analytics to analyse the use of our website. Google Analytics gathers information about website use by means of cookies. The information gathered relating to our website is used to create reports about the use of our website. Google's privacy policy is available at: <https://www.google.com/policies/privacy/>. [The relevant cookies are `_ga`, `_gat`, and `_git` and in general described by google here: <https://support.google.com/analytics/answer/6004245?hl=en>.

You may choose to opt out of using Google Analytics for our website by downloading the Opt-out tool under <https://tools.google.com/dlpage/gaoptout>.

We have set up google analytics actively to anonymise the IP while tracking, enabling support for user opt-out, and excluding tracking for users sending Do Not Track header. We also disabled all further tracking related to marketing or cross-tracking, as you see from the screenshot.



- 11.3 We have the plugin WP GDPR Compliance installed that constantly ensures that our website complies with the GDPR (<https://www.wpgdpr.com>).

## 12. Managing cookies

- 12.1 Most browsers allow you to refuse to accept cookies and to delete cookies. The methods for doing so vary from browser to browser, and from version to version. You can however obtain up-to-date information about blocking and deleting cookies via these links:

- (a) <https://support.google.com/chrome/answer/95647?hl=en> (Chrome);
- (b) <https://support.mozilla.org/en-US/kb/enable-and-disable-cookies-website-preferences> (Firefox);
- (c) <http://www.opera.com/help/tutorials/security/cookies/> (Opera);
- (d) <https://support.microsoft.com/en-gb/help/17442/windows-internet-explorer-delete-manage-cookies> (Internet Explorer);
- (e) <https://support.apple.com/kb/PH21411> (Safari); and
- (f) <https://privacy.microsoft.com/en-us/windows-10-microsoft-edge-and-privacy> (Edge).

12.2 Blocking all cookies will have a negative impact upon the usability of many websites.

12.3 If you block cookies, you might not be able to use all the features on our website.

### 13. Our details

13.1 This website is owned and operated by Global Impact Institute s.r.o.

13.2 We are registered in the Czech Republic under registration number CZ06157181, and our registered office is at a. Kralodvorská 16, 11000 Praha (until April 30, 2018) b. Dělnická 213/12, 17000 Praha (from May 1, 2018, onwards).

13.3 Our principal place of business is at a. Kralodvorská 16, 11000 Praha (until April 30, 2018) b. Dělnická 213/12, 17000 Praha (from May 1, 2018, onwards).

13.4 You can contact us:

- (a) by post, to the postal address given above;
- (b) using our website contact form;
- (d) by email, using the email address published on our website from time to time.

### 14. Data protection officer

14.1 Due to the nature of our company, we are not in need to nominate a data protection officer. Our data is handled by the Managing Director: Uwe Brandenburg, [uwe.brandenburg@globalimpactinstitute.eu](mailto:uwe.brandenburg@globalimpactinstitute.eu).