



Relief & Reconciliation International AISBL

GENERAL DATA PROTECTION POLICY

as adopted by the Board of Directors on 9 June 2018

Introduction

This General Data Protection Policy applies between you, the User of this Website and Relief & Reconciliation International AISBL (R&R International), the owner of this Website, as well as to all activities of R&R International that imply the storage and use of personal data. R&R International takes the privacy of your information very seriously. This General Data Protection Policy applies to our use of any and all Data collected by us or provided by you in relation to your use of the Website and to the interaction you may have with representatives of R&R International.

R&R International is a non-profit organisation that is combining peacebuilding with humanitarian aid in response to the Syrian crisis. Personal interaction with our members, supporters and those we serve is at the heart of our mission to help create a sustainable and just peace in Syria and its neighbouring countries. The context of R&R International's mission in relation to the Syrian crisis presents significant data protection risks for our members, supporters and those we serve. For this reason, this General Data Protection Policy goes beyond the requirements of a simple privacy policy.

Misuse of personal data, through loss, disclosure, or failure to comply with the Data Protection Principles and the rights of data subjects, may result in significant legal, financial and reputational damage. This may include penalties of up to €20 million or 4% of worldwide annual turnover for serious breaches of the law, claims for compensation and loss of recruitment and research income.

In order to manage these risks, this policy sets out responsibilities for all representatives, board members, managers, employees, volunteers, contractors, and anyone else who can access or use personal data in their work for R&R International.

Please read this General Data Protection Policy carefully.

Definitions and interpretation

1. In this General Data Protection Policy, the following definitions are used:

Data	collectively all information that you submit to R&R International via the Website. This definition incorporates, where applicable, the definitions provided in the Data Protection Laws;
Board of Directors	the Board of Directors of R&R International that is elected as highest executive body according to the Statutes of R&R International;
Cookies	a small text file placed on your computer by this Website when you visit certain parts of the Website and/or when you use certain features of the Website. Details of the cookies used by this Website are set out in the clause below (Cookies);
Country Director	the head of all R&R International staff in a Country of Operations who appointed by and responding to the Board of Directors;
Country of Operations	a country where R&R International is operating in the fields of conflict transformation and humanitarian aid, according to its statutes, internal

rules of procedure and any other decision by R&R International bodies

Data Protection Laws	any applicable law relating to the processing of personal Data, including but not limited to the Directive 96/46/EC (Data Protection Directive) or the GDPR, and any national implementing laws, regulations and secondary legislation;
EU Cookie Law	the Privacy and Electronic Communications (EC Directive) Regulations 2003 as amended by the Privacy and Electronic Communications (EC Directive) (Amendment) Regulations 2011;
GDPR	the General Data Protection Regulation (EU) 2016/679;
R&R International, or us	Relief & Reconciliation International AISBL, registered at Chaussée de Wavre 205 in 1050 Brussels, Belgium, or any of its National Chapters or affiliates according to its Statutes and Internal Rules of Procedure.
User or you	any third party that accesses the Website and is not either (i) employed by R&R International and acting in the course of their employment or (ii) engaged as a consultant or otherwise providing services to R&R International and accessing the Website in connection with the provision of such services; and
Website	the website www.reliefandreconciliation.org and any sub-domains of this site unless expressly excluded by their own terms and conditions.

Scope of this General Data Protection Policy

2. This policy covers the Board of Directors of R&R International as well as all staff of R&R International who have access to Data. This includes those staff, paid or voluntary, employed directly by R&R International, as well as those professionals contracted or invited to provide services to R&R International or its affiliates or associates.
3. This General Data Protection Policy applies to all personal data created or received in the course of R&R International activities in all formats, of any age. Personal data may be held or transmitted in paper, physical and electronic formats or communicated verbally in conversation or over the telephone. R&R International is committed to the highest standards of data protection not only of those who visit our Website and support our work but also for those we serve.
4. This General Data Protection Policy applies in particular to the actions of R&R International and Users with respect to its Website. It does not extend to any websites that can be accessed from its Website including, but not limited to, any links we may provide to social media websites.
5. For purposes of the applicable Data Protection Laws, R&R International is the "data controller". This means that R&R International determines the purposes for which, and the manner in which, your Data is processed.

Data collected

6. We may collect the following Data, which includes personal Data, from you:
 - a. name;
 - b. gender;
 - c. contact Information such as email addresses and telephone numbers;
 - d. postal address and country of residency;
 - e. emergency contacts in case you become R&R International staff member or beneficiary;
 - f. date of birth in case you become R&R International staff member or beneficiary;
 - g. information pertaining to the enrolment in R&R International activities;
 - h. in each case, in accordance with this General Data Protection Policy.

How we collect Data

7. We collect Data in the following ways:
 - a. data is given to us by you; and
 - b. data is collected automatically.

Data that is given to us by you

8. R&R International will collect your Data in a number of ways, for example:
 - a. when you contact us through the Website, by telephone, post, e-mail or through any other means;
 - b. when you register with us to apply for membership or for a vacancy or an activity with us;
 - c. when you make donation or membership fee payments to us, through our Website or otherwise;
 - d. when you elect to receive news update communications from us;
 - e. when you participate in activities offered by R&R International or its affiliates or associates;
- in each case, in accordance with this General Data Protection Policy.

Data that is collected automatically

9. To the extent that you access the Website, we will collect your Data automatically, for example:
 - a. we automatically collect some information about your visit to the Website through our third-party Website host Weebly, Inc. (“Weebly”). This information helps us to make improvements to Website content and navigation, and includes your IP address, the date, times and frequency with which you access the Website and the way you use and interact with its content.

- b. we will collect your Data automatically via cookies, in line with the cookie settings on your browser. For more information about cookies, and how we use them on the Website, see the section below, headed "Cookies".

Our use of Data

10. Any or all of the above Data may be required by us from time to time in order to provide you with the best possible service and experience when using our Website. Specifically, Data may be used by us for the following reasons:

- a. internal record keeping;
- b. improvement of our information services;
- c. transmission by email of information materials that may be of interest to you;
- d. coordination or referrals to inter-agency focal points if you are beneficiary of R&R International activities in our Countries of Operations.

in each case, in accordance with this General Data Protection Policy.

11. We may use your Data for the above purposes if we deem it necessary to do so for our legitimate interests. If you are not satisfied with this, you have the right to object in certain circumstances (see the section headed "Your rights" below).

12. For the delivery of direct new update communications to you via e-mail, we'll need your consent, whether via an opt-in or soft-opt-in:

- a. soft opt-in consent is a specific type of consent which applies when you have previously engaged with us (for example, you contact us to and check the box on our contact form to receive regular updates). Under "soft opt-in" consent, we will take your consent as given unless you opt-out.
- b. if you are not satisfied about our approach to communication, you have the right to withdraw consent at any time. To find out how to withdraw your consent, see the section headed "Your rights" below.

13. When you register with us to become an Associate Member of R&R International or to apply for an open vacancy or to participate in any other activity offered by R&R International, the legal basis for this processing is the performance of a contract between you and us and/or taking steps, at your request, to enter into such a contract.

Who we share Data with

14. We may share your Data with the following groups of people for the following reasons:

- a. any of our group associations or affiliates - to inform you, upon your request, about our work and to put you in touch with other members of R&R International in your place of residency;
- b. our employees, agents and/or professional advisors - to process your donation to us, your request for information or your request for membership with R&R International;

- c. third party agencies working in the fields of conflict transformation or humanitarian aid in the countries of operations of R&R International to proceed referrals with the informed consent and to the benefit of those we serve;
- d. third party service providers who provide services to us which require the processing of personal data - to help third party service providers in receipt of any shared data to perform functions on our behalf to help ensure the Website runs smoothly and the news updates you requested are delivered to you;
- e. third party payment providers who process payments made over the Website - to enable third party payment providers to process user donations and refunds;

in each case, in accordance with this General Data Protection Policy.

Keeping Data secure

- 15. Access to data will only be granted on a strict need-to-know basis defined according to the responsibilities detailed in this General Data Protection Policy. By default, only the Executive Board of R&R International has access to all Data collected.
- 16. The designated Data Protection Director within the Executive Board can provide full access to all Data to other persons, such as a professional webmaster, so to assist with the processing of Data; such access by any other person, internal or external to R&R International, can only be granted after the signature of a written contract with the other person ensuring the highest Data Protection standards in accordance with this General Data Protection Policy.
- 17. We will use technical and organisational measures to safeguard your Data, for example:
 - a. access to your Data is controlled by a password the people who access it must enter;
 - b. we store your Data on secure servers.
- 18. Technical and organisational measures include measures to deal with any suspected data breach. If you suspect any misuse or loss or unauthorised access to your Data, please let us know immediately by contacting us via this e-mail address: contact@reliefandreconciliation.org.

Data retention

- 19. Unless a longer retention period is required or permitted by law, we will only hold your Data on our systems for the period necessary to fulfil the purposes outlined in this General Data Protection Policy or until you request that the Data be deleted.
- 20. Even if we delete your Data, it may persist on backup or archival media for legal, tax or regulatory purposes.

Your rights

- 21. You have the following rights in relation to your Data:
 - a. **Right to access** - the right to request (i) copies of the information we hold about you at any time, or (ii) that we modify, update or delete such information. If we provide you with access to the information we hold about you, we will not charge you for this, unless your request is

"manifestly unfounded or excessive." Where we are legally permitted to do so, we may refuse your request. If we refuse your request, we will tell you the reasons why.

- b. **Right to correct** - the right to have your Data rectified if it is inaccurate or incomplete.
 - c. **Right to erase** - the right to request that we delete or remove your Data from our systems.
 - d. **Right to restrict our use of your Data** - the right to "block" us from using your Data or limit the way in which we can use it.
 - e. **Right to data portability** - the right to request that we move, copy or transfer your Data.
 - f. **Right to object** - the right to object to our use of your Data including where we use it for our legitimate interests.
22. To make enquiries, exercise any of your rights set out above, or withdraw your consent to the processing of your Data (where consent is our legal basis for processing your Data), please contact us via this e-mail address: contact@reliefandreconciliation.org.
23. If you are not satisfied with the way a complaint you make in relation to your Data is handled by us, you may be able to refer your complaint to the relevant data protection authority.
24. It is important that the Data we hold about you is accurate and current. Please keep us informed if your Data changes during the period for which we hold it.

Transfers outside the European Economic Area

25. Data which we collect from you may be stored and processed in and transferred to countries outside of the European Economic Area (EEA). For example, this could occur if the servers of our Website provider are located in a country outside the EEA or one of our service providers is situated in a country outside the EEA. We also share information with our group associations, some of which are located outside the EEA.
26. We will only transfer Data outside the EEA where it is compliant with data protection legislation and the means of transfer provides adequate safeguards in relation to your data, e.g. by way of data transfer agreement, incorporating the current standard contractual clauses adopted by the European Commission, or by signing up to the EU-US Privacy Shield Framework, in the event that the organisation in receipt of the Data is based in the United States of America.
27. To ensure that your Data receives an adequate level of protection, we have put in place appropriate safeguards and procedures with the third parties we share your Data with. This ensures your Data is treated by those third parties in a way that is consistent with the Data Protection Laws.

Links to other websites

28. Our Website may, from time to time, provide links to other websites. We have no control over such websites and are not responsible for the content of these websites. This General Data Protection Policy does not extend to your use of such websites. You are advised to read the General Data Protection Policy or statement of other websites prior to using them.

Cookies

29. Our Website may place and access certain Cookies on your computer. R&R International uses Cookies exclusively through its Website host Weebly to improve your experience of using the Website, in accordance with Weebly's privacy policy.
30. All Cookies used by this Website are used in accordance with current EU Cookie Law.
31. Before the Website places Cookies on your computer, you will be presented with a message bar requesting your consent to set those Cookies. By giving your consent to the placing of Cookies, you are enabling R&R International to provide a better experience and service to you. You may, if you wish, deny consent to the placing of Cookies; however certain features of the Website may not function fully or as intended.
32. Our Website may place the following Cookies:

Type of Cookie	Purpose
Strictly necessary cookies	These are cookies that are required for the operation of our website. They include, for example, cookies that enable you to log into secure areas of our website, use a shopping cart or make use of e-billing services.
Analytical/performance cookies	They allow us to recognise and count the number of visitors and to see how visitors move around our website when they are using it. This helps us to improve the way our website works, for example, by ensuring that users are finding what they are looking for easily.
Functionality cookies	These are used to recognise you when you return to our website. This enables us to personalise our content for you, greet you by name and remember your preferences (for example, your choice of language or region).

33. You can choose to enable or disable Cookies in your internet browser. By default, most internet browsers accept Cookies but this can be changed. For further details, please consult the help menu in your internet browser.
34. You can choose to delete Cookies at any time; however you may lose any information that enables you to access the Website more quickly and efficiently including, but not limited to, personalisation settings.
35. It is recommended that you ensure that your internet browser is up-to-date and that you consult the help and guidance provided by the developer of your internet browser if you are unsure about adjusting your privacy settings.
36. For more information generally on cookies, including how to disable them, please refer to aboutcookies.org. You will also find details on how to delete cookies from your computer.

Responsibilities

37. The Board of Directors of R&R International, represented by its Chairperson or any other Board Member designated for this purpose, is ultimately responsible for the lawful and ethical treatment of your Data in accordance with this General Data Protection Policy and with the applicable law.
38. The Board of Directors of R&R International shall appoint a Data Protection Director amongst the Executive Board Members who is exercising the functions of a webmaster to this Website and who is responsible for designating the persons who have access to Data, internal or external to R&R International, limiting the scope of their access and their responsibility.
39. The Data Protection Director shall deliver once per year a confidential Data Protection Report to the Ordinary General Assembly of R&R International, detailing the persons who have had access to personal Data in the past year and reporting about any Data breaches or risks.
40. The Country Director in each Country of Operations of R&R International shall have full access to and be responsible for the protection of all Data of R&R International staff members and beneficiaries in the respective Country of Operations. The Country Director may designate other persons amongst the R&R International staff members under his/her responsibility for accessing Data of beneficiaries, limiting the scope of their access and their responsibility. The Country Director shall report to the Board of Directors on a monthly basis about who has had access to personal Data in the past month and report about any Data breaches or risks.

Professional e-mail accounts

41. The designated Data Protection Director within the Executive Board shall ensure the opening of a professional e-mail account of R&R International for every elected Board Member, every chairperson of a National Chapter, according to R&R International's Internal Rules of Procedure, as well as for every key staff member and every other member of R&R International authorised to hold such a professional e-mail account by the Board of Directors.
42. Professional e-mail accounts of R&R International shall be closed and archived by the Data Protection Director earliest one month after the end of mandate of the holder of such professional e-mail account, which means either the resignation or end of term or the end of a contract. Data stored on such a professional e-mail account can be accessed and archived by the Data Protection Director before the e-mail account is deleted.
43. The designated Data Protection Director within the Executive Board may access any professional e-mail account of R&R International without the consent of the holder of such professional e-mail account in case of a suspected breach of this General Data Protection Policy, of the General Code of Conduct of R&R International or of any other policy decided by its Board of Directors. The Data Protection Director must receive the prior written consent of another Executive Board Member before processing such access; the Board of Directors must be informed about such access in writing at least one month after its occurrence.

Beneficiary Data

44. Highest Data Protection standards shall be applied, in accordance with this General Data Protection Policy, to all personal Data of those we serve in a Country of Operations.

45. The Country Director of R&R International in a Country of Operations shall be responsible to draft specific Data Protection Guidelines for the Country of Operations in question. Such Data Protection Guidelines must be submitted to the Board of Directors of R&R International for review and approval on an annual basis. Such Data Protection Guidelines shall include a Privacy Impact Assessment that identifies risks to privacy, and presents risk avoidance and/or mitigation strategies for ensuring the highest possible level of Data Protection of those we serve.
46. Data of beneficiaries of R&R International activities may only be shared with third parties, such as other agencies or national authorities, with the informed consent of the beneficiary and for a specific legitimate purpose. The best interest of the individual beneficiaries whose Data is shared shall always have highest priority for determining what Data can be shared.
47. Outbound transfers of beneficiary Data must be limited to the minimum necessary to fulfil the specific and legitimate purpose(s) for which the beneficiary has given his/her consent. If possible, R&R International should agree with the third party which security measures are best suited for protecting the confidentiality of such Data.

General

48. You may not transfer any of your rights under this General Data Protection Policy to any other person. We may transfer our rights under this General Data Protection Policy where we reasonably believe your rights will not be affected.
49. If any court or competent authority finds that any provision of this General Data Protection Policy (or part of any provision) is invalid, illegal or unenforceable, that provision or part-provision will, to the extent required, be deemed to be deleted, and the validity and enforceability of the other provisions of this General Data Protection Policy will not be affected.
50. Unless otherwise agreed, no delay, act or omission by a party in exercising any right or remedy will be deemed a waiver of that, or any other, right or remedy.
51. This Agreement will be governed by and interpreted according to the laws of Belgium. All disputes arising under the Agreement will be subject to the exclusive jurisdiction of the Belgian courts.

Changes to this General Data Protection Policy

52. R&R International reserves the right to change this General Data Protection Policy as we may deem necessary from time to time or as may be required by law. Any changes will be immediately posted on the Website and you are deemed to have accepted the terms of the General Data Protection Policy on your first use of the Website following the alterations.

You may contact R&R International by email at contact@reliefandreconciliation.org.

Attribution

53. This General Data Protection Policy was created on the basis of a document from Rocket Lawyer (<https://www.rocketlawyer.co.uk>).

09 June 2018