



Euro-Mediterranean Foundation of Support to Human Rights Defenders

Privacy Policy

Embedded in its mission, the Euro-Mediterranean Foundation of Support to Human Rights Defenders (EMHRF) firmly values and respects the right to privacy and is committed to processing relevant personal data in accordance with the [EU General Data Protection Regulation \(GDPR\)](#).

The Privacy Policy applies to personal information we collect, how we use the information, and with whom we share it. This Policy also describes the measures we take to protect the security of the information and how users can contact us about our privacy practices.

EMHRF Identity and Contact Details

EMHRF is a Danish Foundation registered under no. 28 47 85 26 with the Danish Business Authority. The headquarters is in Copenhagen (1456).

EMHRF has a sub-office registered in France under SIRET no. 802 117 341 00015 located in Montreuil (93100), where a limited part of the administration and consequently the processing of personal data may also take place.

How We Collect Personal Data

We collect most of the personal data through your manual submissions.

You can access EMHRF website without telling us who you are and without revealing any personal information.

The types of personal data you may submit to EMHRF include:

- For job applicants, personal information contained in a résumé, C.V., employment history, education history and references.
- For applicants for support, information regarding the application according to the requirements of our application guidelines and forms.
- For grantees and fiscal intermediaries, personal information contained in ID, banking and contact details for an individual, and registration and statutes as well as banking and contact details for an association.

- For members of the Board and staff/consultants, personal information contained in ID, social security number when required by applicable law, banking and contact details.

The mandatory or optional nature of the data is indicated to you at the time of collection. In the absence of communication of mandatory personal data, we will not be able to respond to your request.

We also collect personal data through our communication with public authorities, cooperation agencies and suppliers, mostly in the form of contact details for contact persons with such entities.

How We Use the Information We Collect

We may use the information described above to:

- Respond to your enquiry
- Process your application for support
- Produce statistics of our interventions
- Meet our legal obligations and requirements, as applicable.

As far as our employees are concerned, we also use their personal data for the purpose of administering the employment relationship.

Information We Share

We do not transfer personal information we collect about you, except as described in this Privacy Policy. Under no circumstances will your personal information be sold or rented to third parties.

The EMHRF does not allow the disclosure of information that could compromise the safety of the persons concerned by its actions. None of the information and documents published on EMHRF website contains personal information about job applicants, applicants for support, grantees, members of the Board and staff/consultants. Moreover, grantees/consultants/staff members' contracts include a confidentiality clause, pursuant to which: *"The parties to the contract undertake to maintain as confidential all information, sensitive material or any other matter, not intended for dissemination, obtained by either party in connection with the co-operation."*

Personal information may be made available to external consultants and auditing firms as well as IT and accounting service providers, notably in connection with controls of EMHRF operations, the payment of wages and charges or with the operation/maintenance of the server and email accounts of EMHRF. We do not authorize these external parties to use or disclose the information except as necessary to perform the services we asked them to perform or to comply with legal requirements. In addition, EMHRF may encrypt, anonymize or pseudonymize personal information that may compromise the safety of the individuals concerned when sharing documentation with external consultants or auditing firms, including [Deloitte](#), [BDO](#), or others.

The EMHRF has signed a Data Processing Agreement with SOLID-IT P/S, the IT service provider of EMHRF, on 24 May 2018 and will sign Data Processing Agreements with other data processors when relevant.

Lastly, we may disclose information about you (1) if we are required to do so by Danish/French law or legal process, (2) to Danish/French law enforcement authorities or other European government entities, and

(3) when we believe disclosure is necessary or appropriate to prevent physical harm or financial loss, or in connection with an investigation of suspected or actual fraudulent or illegal activity.

Personal Data Storage

Your personal information will be processed and stored by EMHRF in a secure and access-restricted server, kept confidential and will only be used in connection with the purposes for which it is submitted following which it will be erased.

- For job applicants, personal data will be kept for administrative purposes for two years following the closing date of the application.
- For applicants for support, personal data will be kept for the duration of our relationship or for the purposes of proof and accounting obligations, for a period not exceeding the statutory limitation periods applicable.
- For grantees and fiscal intermediaries, personal data will be kept for the duration of our relationship or for the purposes of proof and accounting obligations, for a period not exceeding the statutory limitation periods applicable.
- For members of the Board and staff/consultants, personal data will be kept for the duration of our relationship or for the purposes of proof and accounting obligations, for a period not exceeding the statutory limitation periods applicable.

However, please note that the transmission of information over the internet is never completely secure, so while we do our best to protect personal information, we cannot guarantee the security of information transmitted over the internet.

Transfer outside European Union

Some of our Board members, staff and technical service providers are located outside the European Union, notably in Tunisia, Morocco, Switzerland, the UK, the USA. As part of our communications with such parties, some personal data collected may be transferred to countries outside the European Union, whose legislation on the protection of personal data differs from that of the European Union.

To the extent that the recipient country or countries are not approved by the European Union as countries providing a level of data protection equivalent to that of the European Union, we undertake to take all appropriate measures for ensuring a GDPR compliant basis for transfer of personal data including the application of EU standard contractual clauses to our relationship with such parties.

Your Rights

According to the provisions of GDPR, the persons in respect of whom EMHRF processes personal data have rights:

- You may request access to the personal data we process about you.
- You may ask us to correct or modify, if necessary, the personal data we process about you.
- You may ask us to delete personal data held by us, and we will delete such personal data unless we are required or permitted by law to process and retain such data.
- You may withdraw the consent you have given us for the processing of personal data, and we will stop processing such data unless we are required or permitted by law to process such data.

- You may request the portability of the personal data we process about you.

Finally, you have the right to lodge a complaint to the relevant national data protection authority, which in Denmark is Datatilsynet www.datatilsynet.dk; Borgergade 28, 5. 1300 Copenhagen K (Tel. +45 33 19 32 00), and in France is the Commission Nationale de l'Informatique et des Libertés (CNIL) <https://www.cnil.fr/fr/plaintes>; 3 Place de Fontenoy, TSA 80715, 75334 Paris Cedex 07.

For security reasons and to avoid any fraudulent request, we may require you to provide proof of identity with the request. After the request has been processed, this receipt will be destroyed.

How We Protect Personal Data

We maintain administrative, technical, and physical safeguards designed to protect the personal data you provide against accidental, unlawful, or unauthorized destruction, loss, alteration, access, disclosure, or use.

Your information will be retained for as long as necessary for the purpose(s) for which it was collected and as required by applicable laws or regulations.

If you have any questions or comments about this Privacy Policy, you can contact us as indicated below.

Links to Other Websites

Our website may provide links to other websites for your convenience and information. These websites may operate independently from us. Linked sites may have their own privacy notices or policies, which we strongly suggest you review. To the extent any linked websites are not owned or controlled by us, we are not responsible for the content and use of the website, or the privacy practices of the website.

Updates to Our Privacy Notice

This Policy may be updated periodically and without prior notice to you to reflect changes in our personal information protection practices. We will indicate at the top of the notice when it was most recently updated.

How to Contact Us

If you would like to request access to or update personal data we have about you, or if you have other questions in respect of this Privacy Policy, please contact EMHRF Programme Director and Finance Director by email respectively at asc@emhrf.org and rti@emhrf.org

Approved by EMHRF Board, on 4 December 2020.