



Privacy Policy

for

Human Rights House Foundation (HRHF)

1. ROUTINES FOR COLLECTING CONSENT AND TO HANDLING DATA

a. Personal data

Personal Data (PD) are any units of information that can be used to identify a person. Identification can be conducted upon one unit of information or in combination with other available information units.

HRHF is responsible for PD entrusted by programme participants, donors, partners, stakeholders, staff, newsletter subscribers, website visitors and others.

b. Consent to use personal data

All persons mentioned above are entitled to know about:

- the types of PD collected by HRHF
- the purpose of HRHF's data collection
- HRHF's measures of data protection and use
- HRHF's procedures of data deletion or publication

HRHF can collect, store and use PD only with the consent of data owners.

This Privacy Policy is available on the HRHF website. HRHF refers to it whenever it collects or uses personal data, or on any demand of persons whose data HRHF collects, stores or uses.

c. Data types HRHF collects and ways of using them

HRHF collects PD from HRHF event applications, newsletter subscriptions, contracts concluded with HRHF, contacts initiated with HRHF, or any other sources.

HRHF only collects data transferred to HRHF voluntarily and necessary for its specific statutory goals. The data are updated with technical tools, securely stored and protected from loss, deletion, improper use, or unauthorised access.



HRHF seeks to process HRHF-collected PD securely and in accordance with all applicable laws and GDPR regulations. To ensure the safety of and prevent unauthorised access to data, HRHF follows certain physical, electronic and managerial procedures.

HRHF-collected PD are never used for profit making.

User PD are stored only for as long as needed for the original purpose of data collection and in accordance with the HRHF Rules of Data Storing. When data are no longer necessary, HRHF deletes them permanently.

Cases of HRHF PD collection:

#	Case of PD collection	Purpose of processing PD
1.	<p>Applications for:</p> <p>1.1 A vacant position/employment in HRHF: HRHF collects data on nationality, names, sex, date of birth, email, phone, place of residence, education level (including informal), language proficiency, place of studies/work, previous jobs, salary, references, NGO membership, participation in educational events, cooperation with HR NGOs, publications and references to them, and special needs.</p> <p>1.2 Participation in trainings on the ILIA e-learning platform: HRHF collects data on nationality, names, sex, date of birth, email, phone, place of residence, education level (including informal), language proficiency, place of studies/work, previous jobs, NGO membership, participation in educational events, cooperation with HR NGOs, publications and references to them, and special needs.</p> <p>1.3 Other events and programmes: HRHF collects names, email, phone, Skype name, NGO membership/work, place of residence (locality), and special needs.</p>	<p>1.1. Interview and potential employment</p> <p>1.2. For enrolment and assessment, commission and decision on participant selection;</p> <p>1.3. For participant selection. We also use this information to invite to programmes and events in person and to offer information about programmes and events;</p>

2.	<p>Volunteers and board members:</p> <p>2.1. HRHF collects data on nationality, names, sex, date of birth, email, phone, place of residence, education level (including informal), language proficiency, place of studies/work, previous and current jobs, references, publications and references to them, special needs and preferences.</p>	<p>2.1. According to the law of the Kingdom of Norway.</p> <p>For honorarium payment and observance of other contract obligations</p>
3.	<p>Persons for whom HRHF organises travels and support:</p> <p>3.1. HRHF collects data on nationality, names, sex, date of birth, email, phone, place of residence, language proficiency, place of studies/work, current jobs, salary, NGO membership, participation in educational events, cooperation with HR NGOs, publications and references to them, special needs and preferences, behavioral patterns.</p>	<p>3.1. To send the information offered and organise the travel arrangement and/or support.</p>
4.	<p>Newsletter subscription: HRHF collects a name and email.</p>	<p>To send the information offered.</p>
5.	<p>Signing a service agreement with an expert or a consultant: names, address of registration, date of birth, passport number or personal identification number, and bank account.</p>	<p>For honorarium payment, travel arrangements and observance of other contract obligations.</p>

d. Condition for HRHF sharing PD with third persons

HRHF processes PD confidentially and shares them with other persons or institutions only when it is necessary for rendering the services applied or when the data owner agrees. We use third parties to process personal details for

- payroll administration
- registration of staff attendance



- making travel arrangements
- hosting the e-learning platform ILIA

All third-party services providers process your personal information only on HRHF's behalf and are bound by contractual terms that are compliant with data protection law in the Kingdom of Norway and the GDPR.

HRHF will only share your PD with third persons with your permission, or if we are legally required to disclose your information in circumstances where this cannot be reasonably resisted.

e. The right of a person to control PD

HRHF guarantees that every person who shares PD with HRHF is entitled to request and receive a copy of all data that HRHF has obtained from this person, and to request correction of inaccurate or outdated information.

If HRHF desires to use PD shared with HRHF for a purpose different from the original purpose of data collection or purposes uncovered by this Privacy Policy, HRHF sends the persons a special request for consent to using PD with explanation of the way and purpose of use. HRHF do not use PD for any purpose without the person's consent.

The person has a right to withdraw their consent to HRHF processing and storage of their PD any time.

f. Contact information

To use the rights enshrined here, or to send requests or claims on this Policy, please contact HRHF by email: christian.parker@humanrightshouse.org

2. RULES OF DATA STORING

HRHF seeks to ensure storage of only the data that are necessary for effective implementation of programmes, projects and strategic goals.

Terms of data storing depends on the data type and the purpose of data collection. HRHF seeks to store data only for as long as they are needed for the purpose, and to delete them permanently when the purpose is met. These Rules establish HRHF principles on storing data and must be applied consistently by the whole organization.

a. The scope of the Rules

These Rules are applicable to all data collected and stored by the HRHF regardless of the storage facility. The Rules apply to data collected by both digital and analogue media (including photos, videos and audios) and stored on paper. Information storing is regulated by the Norwegian legislation, the EU General Data Protection Regulation (GDPR) and applicable international regulations.



b. Reasons for data storing

HRHF stores data for effective implementation of programmes, projects to achieve the strategic goals and status.

c. Data duplication

HRHF seeks to avoid duplication of PD it stores; however, data can be stored in multiple sources in some cases because of programmatic or other reasons. These Rules apply to all data HRHF possesses, including the duplicated versions.

d. Terms of storing (different types of PD)

HRHF has established following terms for storing all PD indicated in the Privacy Policy:

- data of event participants are stored for the period of the event organization, including follow up actions, such as reporting;
- data of ILIA programme participants are stored for as long as the programme grant agreement is valid, and for some extra time indicated by the grant agreement and the law of the kingdom of Norway;
- data of sub-grantees, subcontractors and consultants are stored for as long as the contract / agreement is valid, and for an additional 10 years;
- data of staff members are stored for the term of their labour contract, and longer if required in the law of the country staff is operating in.

e. Deletion of data

HRHF guarantees that it fully controls the PD stored and processed. When the above mentioned terms expire, HRHF shall delete the data according to the Rules.

If a HRHF staff or team member believes that there is a legitimate reason for some data not to be deleted after the term of storage expires, s/he should identify the data unit and notify the management on why these data should not be deleted. Any exceptions from these Rules of Data Storing shall be agreed with the Executive Director in HRHF.

3. INTERNAL SECURITY ROUTINES

This policy applies to all personal data processed by HRHF

HRHF privacy policy outlines behaviors expected of employees when dealing with data and provides a classification of the types of data with which they should be concerned.

The HRHF shall ensure that personal data is stored securely using modern software that is kept-up-to-date.

Access to personal data shall be limited to personnel who need access and appropriate security should be in place to avoid unauthorized sharing of information.

When personal data is deleted this should be done safely such that the data is irrecoverable.

Appropriate back-up and disaster recovery solutions shall be in place.



The ILIA project coordinator shall take responsibility for the ILIA ongoing compliance with this HRHF data protection policy.

4. ROUTINES FOR TAKING AND USING PHOTOGRAPHS / VIDEO

Consent and the rights of people being photographed / filmed

Regardless of the copyright considerations, the person (subject) being photographed/filmed has certain rights related to their image – as such, photographs/videos must only be published with the consent of the subject.

This consent can be dispensed with if the publication of the image/video is justified by a preponderant public or private interest. When this is not obvious, make sure you ask for the consent of the person or persons concerned. This can be done verbally, but consent forms are preferred. For events, consider issuing consent forms as participants sign-in.

Photographs/videos taken in the public space

If photographs/videos are taken in the knowledge of all present and if the people represented in the photos do not constitute the main subject, it is sufficient to delete the photograph/video on request of the person photographed/filmed (immediately or later) or to abandon its publication. However, there is no need to address them expressly to inform them of their rights.

Withdrawal of consent

It is possible to withdraw the consent given at any time, which entails the obligation to cancel the publication, as far as it is still possible. If this withdrawal is a source of prejudice (e.g if it prevents the use of already printed leaflets), the person who has withdrawn his authorization may be obliged to take all or part of the damage caused.

5. HOW WE DEAL WITH BREACHES OF OUR PRIVACY POLICY

In the event of a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorized disclosure of, or access to, personal data, HRHF will promptly assess the risk to people's rights and freedoms and if appropriate report this breach to the Operations team. These are the steps to follow when you deal with breaches:

1. Assess what you can do to mitigate the risk created (example: computer stolen, mobile, phone stolen, suitcase lost during travel, lost folder ..)
2. Take action (change passwords, close the SIM cards.....)
3. Fill out the form to report the breach of the Privacy policy as soon as possible (see annexe)
4. Send it to prisca.jaobelison@humanrightshouse.org for Geneva and yanina.unnli@humanrightshouse.org for Oslo