

## **Defence for Children International (DCI) Data Privacy Policy for the website for the NGO Panel for the Global Study on Children Deprived of Liberty**

Defence for Children International (DCI), as host of the website for the **NGO Panel for the Global Study on Children Deprived of Liberty** - <https://childrendeprivedofliberty.info> - complies with European Union privacy legislation, the General Data Protection Regulation (GDPR) law, and the Swiss Data Protection Act (DPA).

In order to communicate with the wider public, our partners and networks, and our donors regarding our latest activities, we may need to collect and process personal data.

The following information is included in this privacy policy:

1. Who are we?
2. What personal data do we collect and why do we collect it?
3. Who do we share your data with?
4. How long do we retain your data?
5. What rights do you have over your data?
6. How do we protect your data?
7. What data breach procedures do we have in place?
8. What happens if we make changes to this privacy policy?

### **1. Who are we?**

Defence for Children International - DCI ("us", "we", or "our") operates <https://childrendeprivedofliberty.info> (the "Platform") as co-convenor of, and on behalf of, the NGO Panel for the Global Study on Children Deprived of Liberty (the "NGO Panel"). From now on this will be referred to as the *website* throughout.

This policy intends to inform you about our policies regarding the collection, use, and disclosure of personal data when you use our website and the choices you have associated with that data. We use your data to provide and improve the Service. By using the website, you agree to the collection and use of information in accordance with this policy.

### **2. What personal data do we collect and why do we collect it?**

While using our website, we may ask you to provide us with certain personally identifiable information that can be used to contact or identify you ("Personal Data"). Personal identifiable information may include, but is not limited to:

- Email address
- First name and last name
- Address, State, Province, ZIP/Postal code, City
- Cookies and Usage Data

Data is never passed to third parties for commercial purposes.

Personal data is only to be collected and processed if you have explicitly given your permission for this. Appropriate technical and organisational measures are taken to ensure the security of all data processed.

Personally identifiable data will be used to provide the service(s) requested. This may include use with third-party service providers. All providers are bound by data protection rules and cannot use or communicate your data for any other purposes than to provide the service on behalf of the NGO Panel.

The website does not collect or process data of children under the age of 18 years. When a child under this age contacts the NGO Panel or registers on our website, in order to comply with legal regulations, a letter of consent from a parent or a legal guardian must be sent to [globalstudy@defenceforchildren.org](mailto:globalstudy@defenceforchildren.org).

a) Comments

When visitors leave comments on our website we collect the data shown in the comments form, and also the visitor's Internet Protocol (IP) address and browser user agent string to help spam detection. We also collect information through:

- Contact forms
- Membership application

b) Cookies

*General website users*

This website uses cookies (small text files) that our site may place on your computer as a tool to remember your preferences. You may refuse the use of cookies by selecting the appropriate settings on your browser. Some cookies on this site are essential and the site will not work as expected without them. These cookies are set when you submit a form, log-in, or interact with the site by doing something that goes beyond clicking on a link. If you leave a comment on our site you may opt in to saving your name, email address and website in cookies. These are for your convenience so that you do not have to fill in your details again when you leave another comment. These cookies will last for one year.

c) Embedded content from other websites

Articles on this site may include embedded content (e.g. videos, images, articles, etc.). Embedded content from other websites behaves in the exact same way as if the visitor has visited the other website.

This website may collect data about you, use cookies, embed additional third-party tracking, and monitor your interaction with that embedded content, including tracing your interaction with the embedded content if you have an account and are logged in to that website.

d) Analytics

Our websites makes use of Google Analytics in order to better comprehend how users find and use our website as well as to track site traffic. Google's privacy policy can be found [here](#) and the list of cookies Google Analytics uses can be found [here](#).

### 3. Who do we share your data with?

We employ third party companies to manage our website ("Service Providers") – including Site Ground, Hover, and WordPress – to perform website-related services and/or to assist us in analysing how our website is used. These third parties have access to your personal data only to perform these tasks on our behalf and are obligated not to disclose or use it for any other purpose.

### 4. How long do we retain your data?

We will not keep data permitting identification any longer than necessary to provide the services requested.

### 5. What rights do you have over your data?

You may choose to request, correct, update or delete the information you have provided to us. If you wish to exercise these rights, please contact us at [globalstudy@defenceforchildren.org](mailto:globalstudy@defenceforchildren.org). This does not include any data we are obliged to keep for administrative, legal, or security purposes.

*If you have any questions regarding this Privacy Policy, you can contact the NGO Panel via email: [globalstudy@defenceforchildren.org](mailto:globalstudy@defenceforchildren.org)*

### 6. How do we protect your data?

We use the following tools and methods to ensure the safety of your data:

- A firewall application – [Wordfence](#) – which monitors our sites for data breaches and security updates
- Siteground makes a daily backup with 30 days of retention
  - Manual backup can be made and stored on our server

The security of your personal information is important to us but remember that no method of transmission over the Internet, or method of electronic storage, is 100% secure. While we strive

to use commercially acceptable means to protect your personal information, we cannot guarantee its absolute security.

#### **7. What data breach procedures do we have in place?**

Wordfence – the firewall application for our sites – continuously checks if either WordPress or our plugins need to be updated, while also scanning for malware.

Additionally, Siteground maintains its own firewall protection and malware scan on its servers, providing a second layer of protection to your data and our sites.

#### **8. What happens if we make changes to this privacy policy?**

Our data processing guidelines are reviewed periodically in accordance with legal requirements and internal procedures. This may result in changes to this privacy policy. Any changes will be posted on these pages and take effect immediately.

*If you have any questions regarding this Privacy Policy you can contact us via email: [globalstudy@defenceforchildren.org](mailto:globalstudy@defenceforchildren.org)*

#### **Legislation governing this policy:**

GDPR: <https://eur-lex.europa.eu/legal-content/EN/TXT/?qid=1528874672298&uri=CELEX%3A32016R0679>

DPA : <https://www.admin.ch/opc/en/classified-compilation/19920153/index.html>