



www.npwj.org

# NON C'È PACE SENZA GIUSTIZIA NO PEACE WITHOUT JUSTICE

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## Privacy Policy

### No Peace Without Justice Privacy Policy

This website together with any non-English language versions (the NPWJ websites) are provided by Non c'è pace senza giustizia ("NPWJ") and hosted in Italy by Aruba s.p.a.

NPWJ is fully committed to protecting your right to privacy.

### What is this Privacy Policy?

This Privacy Policy sets out our information processing practices in relation to you and your personal data. These principles apply when we collect personal data from you through any channel. It explains NPWJ's information processing practices and applies to any personal information you provide us and any personal information we collect from other sources. This Privacy Statement is a description of our practices and of your rights regarding your personal information, but it is not a contract and it does not create any new rights or obligations beyond what the law already provides. This Privacy Policy does not apply to your use of a third-party site linked to on this website: please refer to that third-party site's privacy policy to understand how they handle your personal information.

Throughout this Policy, "NPWJ" refers to Non c'è pace senza giustizia (registered in Italy), No Peace Without Justice I.C. (registered in the USA), No Peace Without Justice aisbl (registered in Belgium), and any NPWJ offices or presence that may exist around the world.

### When and how do we collect your information?

NPWJ collects personal information in the following ways:

- Website and social media use: We collect information about how visitors use our websites and our social media. This may include the log data from your visit to our website; analytics data about your usage patterns and the performance of our website; and technical information about your browsers and device configuration.



www.radicalparty.org

No Peace Without Justice is an international non-profit organisation born of a campaign of the Transnational Radical Party and is constituent association of the Nonviolent Radical Party Transnational and Transparty, an NGO with General (Category I) Consultative Status at the United Nations ECOSOC.

Non c'è Pace Senza Giustizia è un'organizzazione internazionale senza scopo di lucro nata nel 1994 da una campagna del Partito Radicale Transnazionale ed è associazione costituente del Partito Radicale Nonviolento Transnazionale e Transpartito, ONG con Status Consultivo Generale di prima categoria presso l'ECOSOC delle Nazioni Unite.



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- **Donations:** If you donate to NPWJ, we collect the data required to process your donation.
- **Volunteer participation and employment:** If you seek employment with NPWJ or volunteer with us, we will collect information related to your role. For example, we will collect employment history information if you submit a CV.
- **Events:** When you register for and attend a NPWJ event, we will collect personal information to keep you informed about the event, follow-up participation and provide appropriate logistical support, including to make flight and visa arrangements.
- **Engagement with campaigns:** We keep a record of your engagement with our campaigns. If you engage with our campaigns, e.g., sign a petition, we will keep a record of these interactions.
- **Inquiries:** When you submit an inquiry, query, or complaint, we will collect the personal information you provide to assist you and follow up with you in the future.
- **Subscriptions:** When you subscribe to our newsletter, we collect the data needed to send you news and information related to your interests.
- **Other Sources:** We use analytics providers and search information providers from whom we may also receive general aggregated, anonymous information about you. NPWJ may also receive your personal information through referrals from others who believe you would like to support our cause or may be interested in working with us. We may combine data about you with data that is available from other sources including publicly available sources.

### **What information do we have?**

#### *Information you provide to us*

When you contact us, we may collect: your name, contact information including physical address, email address, telephone number, and any other information that you voluntarily provide to us. When a visitor provides personal information to us, we use it for the purposes for which it was provided to us as stated at the point of collection or as obvious from the context of collection.

#### *Information we collect*

We may collect any of the following types of information when you register for events, make inquiries, access various content and visit our websites. This includes, but is not limited to:



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- Contact information you provide, such as name, e-mail address, postal address, phone number and mobile number;
- Communication preferences you indicate;
- In some instances, we automatically collect certain types of information when you visit our websites and through e-mails that we may exchange. Automated technologies may include the use of web server logs to collect IP addresses, "cookies" and other tracking technologies (see below for further information).

### *Social Media:*

You can engage with us through social media websites or link your account with us to third party social media sites. When you link your account or engage with us on or through third-party social media sites, plug-ins, or applications, you may allow us to have ongoing access to certain information from your social media account (e.g., name, e-mail address, photo, gender, birthday, the posts or your “likes”). For more information about how you can customise your privacy settings and how third party social media sites handle your personally identifiable information, please refer to their privacy help guides, privacy notices and terms of use.

### **How do we use your personal information?**

- Operating our websites and understanding its use for statistical purposes (number of site visits, average time visitors spend at the site, etc.) and security purposes;
- Managing and processing inquiries, registrations, donations and other interactions with you;
- Forwarding or sending petitions you have signed to advocacy targets;
- Providing you with information about services we offer such as newsletters, breaking news, reports, etc. and informing you of other relevant NPWJ activities;

We will not send you such information if you indicate you would prefer not to receive it from us or, if applicable, local law does not permit us to send you such information. Please see the section on **Your Choices Regarding Your Information** below if you do not wish to receive such information;

- Sharing the information that you provided us with third-party service providers who help us to provide our services and operate.

Sharing of information with third parties, including contractors, will be limited to the specific purposes for which such service providers will be engaged, and will require them to comply with data protection requirements.

We use service providers, which may change from time to time, to undertake some activities that include, but are not limited to:

- process donations;



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- operate our websites and other IT systems;
- administer our e-mail lists;
- complying with applicable laws and regulations.
- Conducting data analytics
- Other uses, such as:
  - Provide you with information and services;
  - Conduct data analysis so we can understand better how to inform the public;
  - Perform monitoring and training;
  - Develop new services; and
  - Conduct data processing where needed to fulfil a contract.

If we wish to use your personal information for a purpose which is not compatible with the purpose for which it was collected for, we will request your affirmative consent. In all cases, in balancing our legal use of your personal information we will give priority to your interests, rights, and freedoms, in accordance with applicable laws and regulations to make sure that your personal information is not subject to unnecessary risk.

### *Legal basis*

All processing (i.e., use) of your personal information will be in compliance with a "lawful basis" for processing. In the majority of cases, the legal basis will be that such processing is justified on the basis that it is conducted in lawful furtherance of our legitimate interests, subject to your interests and your fundamental rights. Processing may also be justified where it is necessary for the performance of a contract to which you are a party, or to take steps (at your request) to enter into a contract; necessary for us to comply with a relevant legal obligation (e.g., where we are legally required by court order to disclose the information); or necessary for the performance of a task carried out in the public interest (e.g. documenting human rights violations). In limited circumstances, we will use your consent as the basis for processing your personal information, for example, where we are required by law to obtain your prior consent in order to send you marketing communications.

### **Do we collect information from children?**

Our website is not intended for children under 16 years of age. We do not knowingly collect personal information from an individual under age 16. If you are under the age of 16, please do not submit any personal information through the website. If you have



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reason to believe that we may have accidentally received personal information from an individual under age 16, please contact us immediately at [privacy@npwj.org](mailto:privacy@npwj.org).

### **How long do we retain your personal information?**

How long we *retain* your personal information depends on the purpose for which it was obtained and its nature. We will keep your personal information only for the period necessary to fulfil the purposes described in this Policy unless a longer retention period is permitted or required by law.

In specific circumstances we may store your personal information for longer periods of time so that we have an accurate record of your dealings with us in the event of any complaints or challenges, or if we reasonably believe there is a prospect of litigation relating to your personal information or dealings.

### **Do we disclose your personal information?**

#### *Within NPWJ*

We may share your personal information within NPWJ to serve you, including for the activities listed in this statement.

We do not rent, sell or otherwise disclose personal information with unaffiliated third parties for their own marketing use. We do not share your personal information with third parties except in the following circumstances discussed below.

#### *Authorized Service Providers*

##### *1. Analytics*

We use third-party analytics tools to better understand who is using the website and how people are using it so we can continuously improve it. These tools may use cookies and other technologies to collect information about your use of the website and your preferences and activities. These tools collect information that assists us in improving the website. This information may be used to analyse and track data, determine the popularity of certain content, and better understand your online activity, among other things.

We use Google Analytics and related services to understand better who is using the website and how people are using it. Google Analytics uses cookies to collect and store information such as website pages visited, places where users click, time spent on each website page, Internet Protocol address, type of operating system used, location-based data, device ID, search history, gender, age, and phone number. We use this information to improve the website and as otherwise described in this Privacy Policy. Please see <http://www.google.com/policies/privacy/partners/> for information about how Google Analytics uses this information, and visit <https://tools.google.com/dlpage/gaoptout> for information about the Google



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Analytics Opt-out Browser Add-on. Google may track your activity over time and across websites.

### *2. Cookies and Other Tracking Technologies*

We may collect and record other information in order for us to understand more about how our website is used and make sure that it accurately reflects your needs, for example your choice of language. To do this we may send cookies to your PC. A cookie is a small file that contains information that allows us to recognise that you have used the site before. These cookies will not contain any personal data.

By browsing our website, you are accepting our use of cookies. If you do not want cookies to be stored on your PC it is possible to disable this function within your browser without affecting your navigation around the site.

In Internet Explorer, click on Tools, click on Settings, click on the Privacy tab and then use the slider bar to choose the level of privacy you want.

In Firefox, click on Tools, click on Options, click on Privacy, click on the Cookies tab and choose your level of privacy.

Our site use cookies for Google Analytics.

We use cookies and other tracking technologies on the website to help us understand and save your preferences and interests so we can compile aggregate data about website traffic and website interaction so that we can offer better website experiences and tools in the future.

### *3. Third Party Service Providers and Business Partners*

We may disclose your information to service providers we have retained (as processors) to perform services on our behalf (either in relation to services performed for you, or information which NPWJ uses for its own purposes, such as improving our website performance). These service providers are restricted from using or disclosing the information except as necessary to perform services on our behalf or to comply with legal requirements. These activities could include any of the processing activities that we carry out as described in the above section, ‘How we use your personal information.’

### *Legal Requirements and Business Transfers*

We may disclose personal information (i) if we are required to do so by law, legal process, statute, rule, regulation, or professional standard, or to respond to a subpoena, search warrant, or other legal request; (ii) in response to law enforcement authority or other government official requests; (iii) when we believe disclosure is necessary or appropriate to prevent physical harm or financial loss; (iv) in connection with an investigation of suspected or actual illegal activity; or (v) in the event that NPWJ is dissolved or otherwise reorganised. Disclosure may also be required for audits or to investigate a complaint or security threat.



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### **Do we transfer your personal information across national borders?**

We work throughout the world and may transfer certain personal information across geographical borders within NPWJ, or to authorised service providers or business partners in other countries working on our behalf in accordance with applicable law. Some of our activities and third parties may be in countries that have not been determined by the European Commission to have an adequate level of data protection. When we do transfer your personal information, we use a variety of legal mechanisms to help ensure your rights and protections travel with your data:

- we ensure transfers within NPWJ ensure that personal information receives an adequate and consistent level of protection wherever it resides within NPWJ;
- where we transfer your personal information outside NPWJ or to third parties who help provide our services, we obtain contractual commitments from them to protect your personal information; or
- where we receive requests for information from law enforcement or regulators, we carefully validate these requests before any personal information is disclosed.

If you would like further information about whether your information will be disclosed to overseas recipients, please contact us on [privacy@npwj.org](mailto:privacy@npwj.org). You also have a right to contact us for more information about the safeguards we have put in place to ensure the adequate protection of your personal information when it is transferred.

### **Do we have security measures in place to protect your information?**

The security of your personal information and respect for your right to privacy are important NPWJ priorities. NPWJ has implemented physical, technical and administrative security standards to protect personal information from loss, misuse, alteration or destruction. We will protect your personal information against unauthorised access, use or disclosure, using security technologies and procedures. NPWJ adheres to a Data Handling and Security Policy, which supplements this Policy and is available on our website.

While we take reasonable measures to protect the information you submit via the website against loss, theft, and unauthorised use, disclosure, or modification, we are also aware, and would like you to be aware, that no internet, email, or mobile application transmission is ever fully secure or error free. Email or other messages sent through the website are not automatically secure or encrypted. You should use caution whenever submitting information through email or the website and take special care in deciding which information you provide us. If you would like to



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transmit information to us more securely, please contact us to make appropriate arrangements.

### **Your Choices Regarding Your Information**

We believe you should decide how we communicate with you and what personal information we obtain and keep about you and share with others. When you provide us with personal details, if we intend to use those details for marketing purposes, we will provide you with the option of whether you wish to receive promotional e-mail, SMS messages, telephone calls and postal mail from us. At any time, you may change your mind and contact us to let us know you do not wish to receive advertising or marketing from us.

You may also choose not to receive marketing communications from us by clicking on the unsubscribe link or other instructions in our marketing e-mails or contacting us as noted below.

You may update, correct, or change your information by contacting us at [privacy@npwj.org](mailto:privacy@npwj.org) or by following the instructions in our communications to you, such as at the end of each newsletter.

### **What are your rights vis a vis your personal data?**

As NPWJ is based in the European Union, you have the following rights under the GDPR. To exercise these rights, please email us at [privacy@npwj.org](mailto:privacy@npwj.org) with a description of your request.

#### *Right to Access*

You have right to access personal information that NPWJ holds about you.

#### *Right to Rectification*

You have a right to request NPWJ to correct your personal information where it is inaccurate, incomplete or out of date.

#### *Right to be Forgotten (Right to Erasure)*

You have the right to have your personal information erased under certain conditions. Your information will be erased in compliance with GDPR unless your data is necessary for the purpose for which it was originally collected, or we have specific legal grounds for preserving or processing the data.

#### *Right to Object to Processing*

You have the right to object to the processing of your personal information at any time, on legitimate grounds, except if otherwise permitted by applicable law, or to lodge a complaint with a supervisory authority. If you raise an objection, we would





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have to show that we have compelling legitimate interests that would override your specific rights and freedoms in any specific case.

### *Right to Restrict Processing*

You have the right to restrict the processing of your personal information, where:

- its accuracy is contested, to allow us to verify its accuracy;
- the processing is unlawful, but you do not want it erased;
- it is no longer needed for the purposes for which it was collected, but we still need it to establish, exercise or defend legal claims; or
- you have objected to processing of your data, and verification of overriding grounds is pending.

### *Right to Data Portability*

You have the right to data portability, which requires us to provide personal information to you or another controller in a commonly used, machine readable format, but only where the processing of that information is based on (i) your consent; or (ii) the performance of a contract to which you are a party.

### *Right to Decline Automated Decision Making*

We currently do not use automated decision making (including automated decision making using profiling) when processing your personal information. If we ever use an automated decision-making solution, you have a right to request that a decision based off your personal information cannot be solely decided via an automated process. You have the right to not be subject to decisions based solely on automated decision making, which produce legal or significant effects for you, except where these are (i) necessary for a contract to which you are a party; (ii) authorised by law; (iii) based on your explicit consent. Even where such decisions are permitted, you can contest the decision and require NPWJ to exercise human intervention.

### *International Transfers*

As noted above, you can ask to obtain a copy of, or reference to, the safeguards under which your personal information is transferred outside of the European Union.

### **Contact Us**

If you have any questions, would like further information about this Policy, our privacy and information handling practices, would like to discuss opt-outs or withdrawing consent, or would like to make a complaint about a breach of applicable legislation or this Policy, please contact us at this address: [privacy@npwj.org](mailto:privacy@npwj.org). Alternatively, you have the right to contact your local Data Protection Authority.



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### **Changes to this Policy**

We may update this Policy from time to time. When we do, we will post the current version on this site, and we will revise the version date located at the bottom of this page. We encourage you to review this Policy periodically so that you will be aware of our privacy practices.

**This Policy was last updated on 25 May 2018.**