

Effective as of 21/02/2023.

# **Privacy Notice**

Your privacy is important to Women Political Leaders AISBL ("WPL", "we", "us", or "our") and we recognise the responsibility you entrust us with when providing your personal data. WPL is an international not-for-profit organisation registered in the company register under BE: 0798.707.304 with the registered seat in Bd Charlemagne 96, 1000 Bruxelles.

This Privacy Notice explains how we handle and treat your personal data when you visit our Sites: https://www.womenpoliticalleaders.org/ or associated sites or pages (our "Sites"), take part in our events or initiatives. The purpose of this Privacy Notice is to provide you with a clear explanation of what personal data we collect, when, why and how we collect, use and share your personal data and it explains your statutory rights.

We strongly urge you to read this notice and make sure you fully understand our practices in relation to personal data before you access or use our Site. If you read and fully understand this Privacy Notice, but remain opposed to our practices, you must immediately leave our Site, and avoid or discontinue all use of any of our services. Where you have read this notice but would like further clarification, please contact us at privacy@wpleaders.org.

## 1. What personal data do we collect and how do we collect it?

Personal data is information that can be used to contact or identify you, such as your name, email address, phone number, etc.

Information you provide to us through the Site or otherwise:

- When you contact us by email: we collect your name; your email address; as well as any information you decide to share with us.
- When you sign up to receive our newsletter: we collect your name and email address.
- When you register to our (online) events: we collect your name; email address; country; organisation; your preferences regarding the subscription to our newsletter; as well as any information you decide to share with us.



- When you register as a participant at conferences organised by WPL: we may collect your name; email address; job title; organisation; sector of activity; gender; country of residence; nationality; and short official bio. We may further collect your age range; Twitter account; and a profile photo.
- When you participate as a speaker at one of the conferences that we organise: we collect your name: email address; job title; organisation; short official bio and picture. Such information is published on our Sites.
- When you participate in one of our survey: we may collect your age; your country of residence, the sector you work in; your gender; as well as any information you decide to share with us. For WPL Board members, WPL global ambassadors, WPL country ambassadors and WPL Special envoys: we collect your name:
- email address; job title; organisation; short official bio and picture. Such information is published on our Sites.
- Special category of personal data: we may collect special categories of personal data, such as information about political opinion or affiliation. Special categories of personal data will only be collected with your consent and will only be used in accordance with this privacy policy.

# Information we obtain from Third-party sources:

We may process and combine personal data we receive from you with personal information we obtain from other sources, such as:

- Public sources, such as government agencies, public records, social media platforms, and other publicly available sources.
- Partners, such as joint marketing partners and event co-sponsors.

## Information we obtain from social media platforms:

• When you visit or interact with our pages on social media platforms, such as Twitter, Facebook, LinkedIn, Instagram, YouTube and other third-party platforms, you are agreeing to the platform provider's privacy policy. This may include sharing with us your name, profile, photos, reactions and comments to our posts, etc. The platform provider's privacy policy applies to your interactions and their collection, use and processing of your personal data. You or the platforms may provide us with information through the platform, and we will treat such information in accordance with this Privacy Policy.



Information collected by automated means from your browser and device through cookies and other tracking technologies:

With your permission where it is required by applicable laws, we and/or, our service providers, and our business partners may automatically log information about you, your browser, your computer or mobile device, and your activity on the Site. The information that may be collected automatically includes your computer or mobile device operating system type and version number, manufacturer and model, device identifier (such as the Google Advertising ID or Apple ID for Advertising), browser type, screen resolution, IP address, the website you visited before browsing to our website, general location information such as city, state or geographic area; and information about your use of and actions on the Site, such as pages or screens you viewed, how long you spent on a page or screen, navigation paths between pages or screens, information about your activity on a page or screen, access times, and length of access. Our service providers business partners may collect this type of information over time and across third-party websites and mobile applications. This information is collected using cookies, and similar tracking technologies. Please consult our Cookie Policy for more information.



# 2. How We Use Your Personal data

We use your personal data for the following purposes and as otherwise described in this Privacy Policy or at the time of collection:

# To provide our services and operate the Sites:

We use your personal data to

- respond to your request, questions and feedback or communicate with you;
- provide you with information and content you have requested;
- promote and administer our activities and events;
- provide, operate and improve the Sites and our services;
- enable security features of the Sites, such as by sending you email when you forget your participant account password;
- communicate with you about the Sites and our services, including sending you announcements, updates, security alerts, and support and administrative messages;
- personalise your experience with the Sites and our communications;
- provide support and maintenance for the Sites.

# To administer your participation in our (online) events and other conferences

We use your personal data to register and administer your participation and enable your participation in our online events and other conferences, and to send you updates about the same.

## To administer your participation in our surveys

We use your personal data to register and administer your participation in our surveys, and to send you updates about the same.



# To send you marketing communications

With your consent where required by applicable laws, we may send you marketing communications, such as our newsletter; communicate with you about our events or surveys.

# For research and development:

We use your personal data to:

- analyse use of our Sites to analyse and improve our Sites and to develop new services;
- conduct research and produce reports based on your participation in our surveys and feedback provided to us.

# For compliance, fraud prevention, and safety

We may use your personal data and disclose it to law enforcement, government authorities, and private parties as we believe necessary or appropriate to: (a) protect our, your or others' rights, privacy, safety or property (including by making and defending legal claims); (b) enforce the Terms and Conditions that govern the Sites; and (c) protect, investigate and deter against fraudulent, harmful, unauthorised, unethical or illegal activity.

# To create anonymous, aggregated or de-identified data

We may create anonymous, aggregated or de-identified data from your personal data and other individuals whose personal data we collect. We make personal data into anonymous, aggregated or de-identified data by removing information that makes the data personally identifiable to you. We may use this anonymous, aggregated or de-identified data and share it with third parties for our lawful purposes, including to analyse and improve the Site, and to produce reports related to the surveys that conduct.

#### To comply with law

We use your personal data as we believe necessary or appropriate to comply with applicable laws, lawful requests, and legal process, such as to respond to subpoenas or requests from government authorities.

# To display advertisements

We work with advertising partners to display advertisements elsewhere online. These advertisements may be targeted based on your use of the Site or your activity elsewhere online.



#### 3. How We Share Your Personal data

We share your personal data with third parties where it is necessary to provide our services and Sites, and for purposes described in this Privacy Policy:

#### Affiliates:

We may share your personal data with our affiliates and subsidiaries, for purposes consistent with this Privacy Policy.

# Service providers:

We may share your personal data with third party companies and individuals that provide services on our behalf or help us operate the Sites (such as support, hosting, analytics, email delivery, marketing, quality assurance vendors, IT services and developers, and database management services).

#### Partners:

We may sometimes share your personal data with partners or enable partners to collect information directly from you or via our Site, e.g., to co-sponsor events or promotions, to cooperatively offer services, or to offer products or services that may be of interest to you.

## Third-party platforms and social media networks:

If you have enabled features or functionality that connect the Site to a third-party platform or social media, we may disclose the personal data that you authorised us to share. In particular, our Site includes certain social media features, including social media share buttons. If you choose to share a post using the social media share button, information about that content will be shared with Facebook, Twitter, Instagram, LinkedIn, YouTube etc. We do not control the third party's use of your personal data. Please consult the third-party platforms' privacy policy to understand how they use your personal data.

## Professional advisors:

We may disclose your personal data to professional advisors, such as lawyers, bankers, auditors and insurers, where necessary in the course of the professional services that they render to us.



# Authorities and others for compliance, fraud prevention and safety:

We may share your personal data for the compliance, fraud prevention and safety purposes described above.

# 4. Your Choices

In this section, we describe the rights and choices available to all users.

Under applicable laws, you may have rights to access, update, rectify, or erase certain personal data that we have about you or restrict or object to certain activities in which we engage with respect to your personal data. If you have such rights and your request complies with the requirements under applicable laws, we will give effect to your rights as required by law.

To exercise any rights you may have under applicable privacy laws, please log in to your account if you are an account holder to amend any of your details, or contact us using the details in the "Contact Us" section below. We may need to request specific information from you to help us confirm your identity and ensure your right to access the personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

# 5. Security Practices

We are committed to keeping the personal data provided to us secure and we have implemented appropriate information security policies, rules and technical measures to protect the personal data that we have under our control from unauthorised access, improper use or disclosure, unauthorised modification and unlawful destruction or accidental loss. We have put in place procedures to deal with any suspected breach of personal data and will notify individuals and any applicable regulator of a breach where we are legally required to do so.

# 6. How long do we keep your personal data?

We will retain your personal data as long as necessary for the purpose for which it was collected, and beyond such time to the extent legally permitted and based on our legal obligations or legitimate interests (e.g. in retaining data for the purposes of responding to possible disputes or complaints).



#### 7. International Data Transfers

Your personal data may be transferred and stored outside your place of residence to countries that are subject to different standards of data protection. In particular, you should be aware that your personal data may be shared with, and transferred to service providers who are located outside the European Economic Area (EEA) or the United Kingdom. We will take appropriate steps to ensure that transfers of personal data are in accordance with applicable laws.

#### 8. Children

Our Sites are not intended for children under 16 years old and we do not knowingly process personal data about children under 16 years old. Parents and guardians should supervise their children's activities at all times. If we learn we have collected or received personal data from a person under 16 without verification of parental consent, we will delete that information. If you believe we might have any information from or about a person under 16, please contact us at privacy@wpleaders.org].

## 9. Links to Other Websites

The Sites may contain links to other websites, mobile applications, and other online services operated by third parties. We are not responsible for the collection, processing or disclosure of personal data collected through other websites. We are also not responsible for any information or content contained on such websites. Links to other websites are provided solely for convenience. Your usage and browsing on any such website are subject to that website's own policies. Please review the privacy notices posted on other websites that you may access through our website. We may provide you with additional or different privacy notices in specific instances which describe how your personal data is collected and used for a specific service.

# 10. Changes to this Privacy Policy

We may make changes to this Privacy Notice from time to time. To ensure that you are always aware of how we use your personal data we will update this Privacy Notice from time to time to reflect any changes to our use of your personal data. We may also make changes as required to comply with changes in applicable law or regulatory requirements. Please regularly check these pages for the latest version of this Privacy Notice.



# 11. How to Contact Us

Please direct any questions or comments about this Policy or privacy practices to privacy@wpleaders.org. You may also write to us via postal mail at:

Women Political Leaders AISBL (WPL) Blvd. Charlemagne 96 1000 Brussels, Belgium

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# EEA/UK GDPR supplemental notice

If you are located in the European Economic Area or the United Kingdom, this EEA/UK GDPR supplemental notice applies to you.

# 1. Who is the Controller?

Women Political Leaders AISBL ("WPL") is the controller of your personal data. Pursuant to Article 27 of the UK GDPR, WPL has appointed a UK GDPR representative in the UK. You can contact WPL's UK GDPR representative regarding matters pertaining to the UK GDPR at: sfenwick-smith@wpleaders.org

## 2. What Are Our Legal Bases for Processing Personal Data?

We use your personal data only as permitted by law. Our legal bases for processing the personal data described in this Privacy Policy are described below.

#### Performance of a contract

We process your personal data as is necessary to provide the services that you requested from us. For example:

- we use your information in order to register and administer your participation in our (online) events or other conferences;
- We share your information with services providers and partners to provide you with the services you requested.

#### Your Consent

We process certain information based on your consent, which you may revoke at any time. For example:



- We and our partners use cookies and similar technologies, as described in more detail in our Cookie Policy, based on your consent;
- We will send you marketing communications where you have consented to receiving such communications in accordance with applicable law;
- We process personal data where you consent to take part in our surveys;
- We process special categories of personal data, such as information about political opinion or affiliation where you have consented to such processing.

# Legitimate Interests

We may process your information where it is necessary for the purposes of our legitimate interests or our partners' legitimate interests. In particular, we process your information in furtherance of the following legitimate interests:

- Analysing your response to our surveys to conduct research and produce reports;
- Keeping the Services safe and secure: We and our service providers use your information because it is necessary to pursue our legitimate interests in ensuring our Site is secure, such as implementing and enhancing security measures and protections, protecting against fraud, spam and abuse;
- Providing, improving, and developing the services: We and our service providers use your information to provide the Site as well our services, including any personalised services, and to understand and improve our business. We do so as it is necessary to pursue our legitimate interests of providing an innovative and tailored offering to our users and participants on a sustained basis.

## Legal Obligation

We may process your information in order to comply with a legal obligation, a court order, or to exercise and defend legal claims. For example:

- We may preserve and disclose your information if it is necessary to respond, based on applicable law, to a valid legal request (e.g. a subpoena, search warrant, court order, or other binding request from government or law enforcement); and
- We may retain and process your information where it is necessary for compliance with applicable laws.

As detailed in the Privacy Policy, where we process your information based on legitimate interests, you have the right to object to such processing. Where you exercise your right to object, we will cease processing your information for that specific purpose, unless there are compelling legitimate grounds overriding your objection or where your information is processed for legal reasons.



## 3. Your rights:

You have the following rights in relation to the personal data we hold about you: Right of access: you can ask us to provide you with information about our processing of your personal data and give you access to your personal data;

- Right to rectification: If the personal data we hold about you is inaccurate or incomplete, you are entitled to request to have it rectified;
- Right to erasure: You can ask us to delete or remove personal data where there is no lawful reason for us continuing to store or process it, where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons that will be notified to you, if applicable, at the time of your request;
- Right to restrict processing: you can ask us to suspend the processing of your personal data if, (i) you want us to establish the data's accuracy; (ii) where our use of the data is unlawful but you do not want us to erase it; (iii) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (iv) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.
- Right to object: Where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation that makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms.
- Right to data portability: You have the right, in certain circumstances, to ask us to provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.
- Right to withdraw consent at any time: where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent.



Please note that some of these rights may be limited where we have an overriding interest or legal obligation to continue to process the personal data or where certain exemptions apply.

To exercise any of these rights, please contact us using the contact details provided above.

Although we urge you to contact us first to find a solution for every concern you may have, you always have the right to lodge a complaint with your competent data protection authority. You can find your data protection authority

For the EEA <u>here</u> For the UK <u>here</u>

# 4. How Do We Protect Personal Data if we transfer it internationally?

We may transfer your personal data outside of the EEA and/or UK. Some of these recipients are located in countries in respect of which either the European Commission and/or UK Government (as and where applicable) has issued adequacy decisions, in which case, the recipient's country is recognized as providing an adequate level of data protection under UK and/or European data protection laws (as applicable) and the transfer is therefore permitted under Article 45 of the GDPR.

Some recipients of your personal data may be located in countries outside the EEA and/or the UK for which the European Commission or UK Government (as and where applicable) has not issued adequacy decisions in respect of the level of data protection in such countries ("Restricted Countries"). For example, the United States is a Restricted Country. Where we transfer your personal data to a recipient in a Restricted Country, we will either:

- Enter into appropriate data transfer agreements based on so-called Standard Contractual Clauses approved from time-to-time under GDPR Art. 46 by the European Commission, the UK Information Commissioner's Office or UK Government (as and where applicable); or
- Rely on other appropriate means permitted by the EU/UK GDPR, which establish that such recipients will provide an adequate level of data protection and that appropriate technical and organisational security measures are in place to protect personal data against accidental or



unlawful destruction, loss or alteration, unauthorised disclosure or access, and against all other unlawful forms of processing.

You may ask for a copy of such appropriate data transfer agreements by contacting us using the contact details above.

