

## **PRIVACY POLICY**

At ICAN we believe in transparency and are committed to being up front about our privacy practices and how we treat your personal information. This Privacy Policy explains how we collect and use your personal information. It also describes your rights and how you can apply them. You are always welcome to contact us with any questions. Using the table of contents below, you can easily navigate to those sections of particular interest to you.

We may change this privacy policy from time to time by updating this posting. Please check this page periodically for changes. Your continued use of this site following the posting of changes to this policy will mean you accept those changes.

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### **1. What is Personal Data**

Personal Data is information that can directly or indirectly attributed to a physical person. For example images and sound recordings that are processed in a computer can be personal data even if no names are mentioned. Encrypted data, different types of electronic identities (such as IP numbers) are personal data if they can be linked to a physical person.

## 2. What Personal Data do we collect and Why?

We collect both personal and non-personal data when you visit our websites ([icanw.org](http://icanw.org) and [nuclearban.org](http://nuclearban.org)), social media pages, or subscribe to our newsletters. We do this in order to optimise the content we offer and - if you have given us permission to do so - contact you about our campaign.

- **Personal information that you provide**, such as name, address, telephone number, e-mail address and date of birth (where appropriate) is something we collect only in connection with specific activities such as campaigns, feedback, surveys, email newsletter subscriptions, donations, etc. You do not have to disclose any of this information if you do not wish to.
- **Information about transactions you complete** - If you complete a donation or another transaction through our website or a third party service on our behalf, we will use this information to process the payment and fulfill our regulatory and/or legal obligations.
- **Non-personal Data:** We collect information about how you access and use our content e.g. our websites and emails, such as: IP address (the location of the computer on the internet), pages accessed, the actions you take, and the time, frequency and duration of your activities. This helps us to determine things like how many individuals use our site, how many people visit on a regular basis, which pages are most popular and which pages are least popular, or which emails are getting a lot of opens and clicks. This information does not tell us anything about who you are, it simply allows us to monitor and improve our service. We do not track your browsing behaviour on other pages, other than which pages referred you to us: e.g. a google search. We track this information using first party cookies and third party data request (see section 7 for more information about cookies).
- **Device information:** we also collect information from and about the computers, phones, connected TVs and other web-connected devices you use to access our content. This helps us optimise our websites and emails to such devices, so you can have the best experience. This data cannot be tracked back to you individually.

## 3. External Links

We show social networking sharing buttons and widgets from Facebook, Twitter, YouTube and Vimeo on our websites to enable you to easily share ICAN campaigns and news with friends. These social networking sharing buttons and widgets come from web servers which may track your behavior on our website and may combine this with other information about you originating from other websites. You can install browser add-ons like “Disconnect” from [Chrome](#) and [Firefox](#) to disable them.

#### **4. Where and how long will the information be held and how is it protected?**

At ICAN, we work with third parties to run a range of services such as email management, data storage, data analytics and payment processing. As a small organisation, we thought it better to contract the services of professionals who can ensure the safe and rapid processing of requests at scale rather than to attempt to build these tools ourselves, which would only take away time and resources from our campaign work. However, we do strive to make sure that all your personal and non-personal data is securely held, protected and gets deleted after a certain period of time or at your request:

- Personal information submitted through the forms on ICAN websites, via email are held either by the processing party (e.g. Mailchimp for newsletters, Paypal and Raisely for donations), or in secure databases of our own, or provided by third parties such as Google, Apple and Amazon AWS3. We strive to have such data stored securely (i.e. password protected and, where necessary, encrypted) where it pertains to sensitive personal information. We will retain it only for the period necessary for processing the request for which the information was given, and to comply with any regulations.
- As we use third party and cloud services for storage, payment processing and email management, we may be obliged to hold and process your information in a non-EU country. However, we will always strive for your personal data to be processed in compliance with the EU / EEA / Swiss regulations. In these cases, the assistant party may only share the information relevant to the purpose and in compliance with existing regulations and Safeguards for sharing data overseas such as the EU- US and Swiss-US Privacy Shield, approved codes of conduct in the recipient country or standard contract clauses. Regardless of the country in which your personal data are processed, we take all reasonable legal, technical and organizational measures to ensure that the level of protection is the same as within the EU / EEA. If you want a copy of the safeguards that have been taken or information about where these have been made available, please contact us.
- We retain Personal Data in an identifiable format for the least amount of time necessary to fulfill our legal or regulatory obligations and for campaign purposes. We may retain Personal Data for longer periods than required by law if it is in our legitimate organisations interests and not prohibited by law, for example to connect with individuals that participated in previous ICAN activities .
- For more information about your rights to access, edit or delete this data, see section 6 below.

## 5. Do we share personal data?

ICAN will not sell or pass on the information you give to us with any other organization outside of ICAN for their own use, unless you have specifically given us permission to do so. When your personal information is shared with third parties, it is for purposes that are compatible with the purposes for which we have collected the information (for example, to communicate with you as a campaigner / support person).

*Example:*

*Your donations through PayPal or Raisely will be collected and processed by those third parties directly to process the payment, but we may also collect your email address on those donation platforms - provided you give us permission to contact you with updates about the campaign- we will import that email address into our email client MailChimp in order to send you information.*

We check all outside organizations to ensure that they can provide sufficient safeguards regarding the security and confidentiality of personal data. We strive to have written agreements with all outside parties through which they guarantee the security of the personal data processed and undertake to comply with our security requirements as well as restrictions and requirements regarding the international transfer of personal data.

In case of staff, contractors, or others receiving payment from ICAN, third parties such as payroll solutions may be contracted to collect, store and process the data to complete the payment. We have agreements with such parties that the data collected will only be used for those purposes, and will only be stored for the time it takes to process them or to comply with regulatory requirements such as audits.

We also share your personal information with some companies that are independent personal data administrators, meaning we are not controlling how the information submitted to the company will be treated. Independent personal data officers with whom we share your personal information are:

- Government agencies (police, tax authorities or other authorities) if we are required to do so by law or in the event of suspected crime.
- Companies handling general goods transports (logistics companies and freight forwarders for letters, magazines and possibly gifts / packages)
- Businesses offering payment solutions (card-insolvent companies, banks and other payment service providers).

When your personal information is shared with a company that is an independent personally responsible person, the company's privacy policy and personal data management applies.

## 6. What are your rights?

You have the right to understand how your personal data are processed. This means that you can request access to certain information and about the treatment. You also have the right to request that incorrect personal data be changed, excessive processing limited, unfounded processing deleted, and requesting to transfer personal data from our system to another player, e.g. data portability.

A request for any of the above can be sent to [admin@icanw.org](mailto:admin@icanw.org).

You have the 'right to be forgotten'. Please notify us in writing and we will take the necessary steps to mask or remove Personal Data and other information, but we reserve our ability to retain and access the data for so long as required to comply with applicable laws

*Example:*

*Under Swiss law, companies have a retention obligation for certain types of records, Article 958F of the Swiss Code of Obligations requires the accounting records, the annual report and audit report to be retained for a period of ten years from the expiry of the financial year in which they have been created.*

We will continue to use and disclose such Personal data in accordance with this Privacy Policy.

## 7. Cookies

Our websites use cookies to collect and track the information listed in section 2. Cookies a small piece of data sent from a website and stored on your computer by your web-browser while you are browsing. Cookies can store a wide range of information, including personally identifiable information (such as your name, home address, email address, or telephone number). However, this information can only be stored if you provide it - websites cannot gain access to information you didn't provide to them, and they can't access other files on your computer. By tracking patterns like which pages are the most visited, how well our page is loading for you, with which devices we're being visited, and what visitors like you are looking for on the website, we can make a website that is more suited to your needs.

ICAN uses the following cookies:

- **First Party Cookies** (a cookie that is set by our website).
  - [PHPSESSID](#) : This cookie is strictly necessary to determine the session
  - The following cookies are connected to the Google Analytics JavaScript libraries to "remember" what a user has done on previous pages / interactions with the website:
    - \_utmt
    - \_utma

- \_utmb
- \_utmc
- \_utmz

- **Third party Cookies:** at the moment, we do not have third party cookies placed on our website.
- **Third Party Requests** are request that are made from a user to an external service. These requests are bases so that certain features on our pages - such as social media sharing buttons or integration to Google Analytics - can run. Despite the fact that these requests don't set any cookies, they can still transfer privacy information to third parties. The services on our website for which we run such requests include:
  - Google AJAX API - which provides us with stable access to all of the most popular, open source JavaScript libraries (such as jQuery), on which some components of our website are run
  - Facebook Connect Widget - to leave comments on our articles via facebook
  - Google Analytics ga.js
  - Google Analytics \_\_utm
  - Facebook Social Plugins: Like Widget

The cookies we use have defined expiration times; unless you visit our sites or use our Services within that time, the cookies are automatically disabled and retained data is deleted. Want to know more about cookies and what they do? Check out these handy explainers by [HowStuffWorks](#) and [The Guardian](#), or visit [allaboutcookies.org](http://allaboutcookies.org)

## 8. What else should you know?

- ICAN does not collect any personal information about users, except that which is knowingly and specifically supplied to us by the user.
- ICAN is committed to ensuring the privacy of your personal information
- We will always give you the option to unsubscribe from our mailing list
- If you are under 18 years old we suggest you ask your parents or guardian before signing up on this site

## **9. Contact us**

Please contact our Data Protection Officer (DPO) for any general questions or concerns about this Privacy Policy and supplemental notices or the way in which we handle your Personal Data.

We are obliged to request proof of identity before access is given.

By Telephone: +41 22 7882063

By Email: [admin@icanw.org](mailto:admin@icanw.org)

By Post:  
Data Protection Officer  
ICAN  
150 route de Ferney  
CP 2100  
1211 Geneve 2  
Switzerland