

# Privacy Policy

## INTRODUCTION

This is the Privacy Policy of the International Panel on the Information Environment (IPIE).

The IPIE respects your privacy and is committed to protecting your personal data. This Privacy Policy will inform you as to how we look after your personal data when you visit our website (regardless of where you visit it from) and tell you about your privacy rights and how the law protects you.

This privacy policy is provided in a layered format so you can click through to the specific areas set out below. Please also use the Glossary to understand the meaning of some of the terms used in this Privacy Policy.

This Privacy Policy is relevant for IPIE Affiliates and Staff, but also for members of the public interacting with the IPIE website and IPIE content on digital platforms. Please contact us at [secretariat@IPIE.info](mailto:secretariat@IPIE.info) with any relevant questions.

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## **IMPORTANT INFORMATION AND WHO WE ARE**

### **PURPOSE OF THIS PRIVACY NOTICE**

This Privacy Policy aims to give you information on how the IPIE collects and processes your personal data.

It is important that you read this Privacy Policy together with any other Privacy Policy or fair processing notice we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This Privacy Policy supplements the other notices and is not intended to override them.

Data protection law requires IPIE, as data controller for your data:

- To process your data in a lawful, fair, and transparent way;
- To only collect your data for explicit and legitimate purposes;
- To only collect data that is relevant, and limited to the purpose(s) we have told you about;
- To ensure that your data is accurate and up to date;
- To ensure that your data is only kept as long as necessary for the purpose(s) we have told you about;
- To ensure that appropriate security measures are used to protect your data.

## **CHANGES TO THE PRIVACY NOTICE AND YOUR DUTY TO INFORM US OF CHANGES**

This version was last updated on 4 May 2023. We may need to update this notice from time to time. If the change is material, we will give you not less than two months' notice of the change so that you can exercise your rights, if appropriate, before the change comes into effect. We will notify you of the change by contacting you at the details you have provided to us in your last correspondence.

It is important that the personal data we hold about you is accurate and current. We may ask you to confirm updates to your personal data from time to time but please keep us informed if your personal data changes during your relationship with us in the meantime. Please inform the IPIE of any changes in your data at the following email address: [secretariat@IPIE.info](mailto:secretariat@IPIE.info).

## **THIRD-PARTY LINKS AND SOCIAL MEDIA**

This website may include links to third-party websites, plug-ins, and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you.

We have a social media presence for the purpose of engaging with the variety of entities and individuals with whom our work is of interest.

If you enable such connections or choose to communicate your personal data to us via third-party websites, third-party email providers or social media, please remember that we do not control these third-party systems and are not responsible for their privacy statements. When you leave our website or interact with us on social media, we encourage you to read the Privacy Policy of every website or forum that you visit or use.

## THE DATA WE MAY COLLECT ABOUT YOU

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

- **Identity Data** includes first name, maiden name, last name, username or similar identifier, marital status, title, date of birth, gender, and photographs.
- **Contact Data** includes postal address, email address and telephone numbers.
- **Professional Data** includes academic qualifications and achievements, references, profession, job title, employer, and professional history of the same.
- **Welfare Data** includes grievance and disciplinary information, pastoral care records, information relating to criminal convictions and allegations of criminal activity, medical records and information including dietary requirements and religious information.
- **Financial Data** includes bank account and payment card details.
- **Transaction Data** includes details about payments to and from you and other details of transactions you have entered into with us.
- **Technical Data** includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access this website.
- **Profile Data** includes your username and password to any IPIE online service, your interests, preferences, feedback, and survey responses.
- **Usage Data** includes information about how you use our website and services.
- **Marketing and Communications Data** includes your preferences in receiving marketing from us and our third parties and your communication preferences.

We refer to the above categories of data in the data subject category tables which can be found [here](#).

We also collect, use, and share **Aggregated Data** such as statistical or demographic data for any purpose. Aggregated Data may be derived from your personal data but is not considered personal data in law as this data does **not** directly or indirectly reveal your identity. For example, we may aggregate your Professional Data to calculate the percentage of students who go into a sector or industry. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this Privacy Policy.

We may collect any **Special Categories of Personal Data** about you as relevant (this may include details about special categories as defined under GDPR, such as race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data). Much of this information is provided by way of Welfare Data and identified as such in our information tables. We may also collect information about criminal convictions and offences. Further legal controls apply to data relating to criminal convictions and allegations of criminal activity. All such information is collected in accordance with this Privacy Policy. We have in place appropriate policy documents and/or other safeguards which we are required by law to maintain when processing such data.

## IF YOU FAIL TO PROVIDE PERSONAL DATA

Where we need to collect personal data by law, or under the terms of a contract that we have with you and you fail to provide that data when requested, we may not be able to fulfil the contract we have or are trying to enter into with you. We will notify you if this is the case at the time.



## HOW YOUR PERSONAL DATA IS COLLECTED

We use different methods to collect data from and about you including through:

- **Direct interactions.** You may give us your Identity, Contact and Financial Data by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:
  - Affiliate yourself with us as an expert/scientist;
  - donate to the IPIE;
  - request access to our reports and materials, including newsletters;
  - keep in touch with our development office;
  - make a payment to us for events or services; or
  - give us some feedback.
- **Automated technologies or interactions.** As you interact with our website, we may automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, [server logs] and other similar technologies. [We may also receive Technical Data about you if you visit other websites employing our cookies.]
- **Third parties or publicly available sources.** We may receive personal data about you from various third parties and public sources as set out below (further details can be found in the information tables):
  - Technical Data from the following parties:
    - (a) analytics providers [such as Google based outside the EU and Switzerland]; and
    - (b) search information providers [such as [Google] based [inside **OR** outside] the EU and Switzerland].
  - Contact, Financial and Transaction Data from providers of technical, payment and delivery services.
  - Professional Data from other establishments and/or employers if they provide references to the IPIE.
  - Identity and Contact Data from members of the IPIE, family members, friends, and other contacts who may provide us with information about you.
- Identity and Contact Data from publicly available sources.

## HOW WE USE YOUR PERSONAL DATA

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Where we need to fulfil the contract we are about to enter or have entered into with you.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal or regulatory obligation.

We may also use your personal information, typically in an emergency, where this is necessary to protect your vital interests, or someone else's vital interests.

Generally, we do not rely on consent as a legal basis for processing your personal data other than in relation to sending third party direct marketing communications to you via email or text message (or in relation to certain special categories of (sensitive) personal data).

## PURPOSES FOR WHICH WE WILL USE YOUR PERSONAL DATA

We have set out, in table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate. Please click on the category relevant to you for more information.

- [Affiliates/Employees](#)
- [Suppliers](#)
- [Donors](#)
- [General Public](#)

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data.

## DISCLOSURES OF YOUR PERSONAL DATA

We do not sell your personal data to third parties. We will only share your personal data with third parties where we are allowed or required to do so by law. We set out in the relevant table the identity and purpose of such disclosure where it is possible for us to do so.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third parties to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions. Third parties who process your data on our behalf are subject to contracts under which their processing activities are managed. Where your personal data is shared with third parties, we will seek to share the minimum amount of information necessary to fulfil the purpose.

## INTERNATIONAL TRANSFERS

Some of our external third parties are based outside the Switzerland) so their processing of your personal data will involve a transfer of data outside Switzerland.

Whenever we transfer your personal data out of Switzerland, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- We will only transfer your personal data to countries that have been deemed to provide an adequate



level of protection for personal data.

- Where we use certain service providers, we may use specific contracts which give personal data the same protection.
- Where we use providers based in the US, we may transfer data to them if they are part of the Privacy Shield which requires them to provide similar protection to personal data shared between the Europe and the US.

## AFFILIATES AND EMPLOYEES

If you are a fellow, member affiliate, employee, volunteer, or applicant to IPIE, this section will be relevant to you. This notice does not form part of any contract of employment.

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest	Third party processing and international transfer information
To engage you as our employee	(a) Identity (b) Contact (c) Professional (d) Welfare (e) Financial	(a) Performance of the employment contract; (b) Necessary to comply with a legal obligation; (c) Necessary for our legitimate interests - processing Welfare Data to carry out a background check is necessary for the protection of the public; processing Identity and Welfare Data for equality monitoring purposes is necessary for us to promote and maintain equality	Third parties providing financial accounting software are engaged to maintain and manage our financial records.  FTA is provided information for tax and accounting purposes.  We engage third parties to administer document destruction services on our behalf.
To manage our relationship with you which will include:  (a) To pay salary, expenses, taxes, pension contributions  (b) To manage grievance, disciplinary and capability matters  (c) To ensure health and safety  (d) Notifying you about changes to our policies and procedures  (e) To provide you with appropriate resources	(a) Identity (b) Contact (c) Professional (d) Welfare (e) Financial	(a) Performance of the employment contract and any other contracts you may enter with the IPIE (e.g., in respect of joint equity scheme arrangements); (b) Necessary to comply with a legal obligation; (c) Necessary for our legitimate interests in respect of: <ol style="list-style-type: none"> <li>health and safety management;</li> <li>catering services to ensure that you receive appropriate service on an ongoing basis;</li> <li>of pension contributions to</li> </ol>	

<p>(f) Providing you with catering</p> <p>(g) Detailing your attendance at and participation in IPIE administrative meetings</p> <p>(h) Processing conflict of interest declarations</p> <p>(i) To manage your absence records (including holiday, sickness records, sabbatical entitlement, and other absences)</p> <p>(j) To manage research project and funding applications and renewals</p> <p>(k) To manage leave and buyout requests</p>		<p>enable the pension provider to operate the pension in accordance with the scheme and your and their respective rights and obligations;</p> <p>iv. your attendance at meetings, we have a legitimate interest in compiling a record of administrative and managerial matters;</p> <p>v. conflict of interest declarations, we have a legitimate interest in understanding when your interests conflict with those of the IPIE and when you will be unable to contribute to management and/or decisions;</p> <p>vi. Professional Data, we have a legitimate interest in holding an up to date record of your learning and development achievements for workforce planning and recognition;</p> <p>vii. Welfare Data as we have a legitimate interest in the proper investigation and handling of relevant complaints, disputes and grievances;</p> <p>viii. absence records as we have a legitimate interest in monitoring and managing the availability of employees;</p> <p>iv. research projects/funding as we have a legitimate interest in recording the research activities of our employees and</p>
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		identifying sources of funding they receive and supporting applications for funding
To administer and protect the IPIE and this website and other digital resources (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	(a) Identity (b) Contact (c) Technical	(b) Necessary for our legitimate interests (for running the IPIE, provision of administration and IT services, network security and to prevent fraud);  (c) Necessary to comply with a legal obligation
To use data analytics to comply with regulatory requirements, improve our website, services, marketing, staff relationships and experiences	(a) Technical  (d) Usage	(a) Necessary to comply with a legal obligation;  (d) Necessary for our legitimate interests (to keep our website updated and relevant, to develop our facilities and to inform our employee engagement strategies)

## SUPPLIERS

If you are a supplier to the IPIE, this section will be relevant to you. This notice does not form part of any contract to provide services.

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest	Third party processing and international transfer information
To register you as a supplier	(a) Identity (b) Contact	(a) Performance of a contract	Third parties providing financial accounting software are engaged to maintain and manage our financial records.
To process and deliver orders for services including to manage payments, fees, and charges	(a) Identity (b) Contact (c) Financial (d) Transaction (e) Marketing and Communications	(a) Performance of a contract	We engage third parties to administer document destruction services on our behalf.
To manage our relationship with you which will include notifying you about changes to our terms or privacy policy	(a) Identity (b) Contact (c) Profile (d) Marketing and Communications	(a) Necessary to comply with a legal obligation; (b) Necessary for our legitimate interests (to keep our records updated and to study how we use supplier services)	
To administer and protect the IPIE and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting	(a) Identity (b) Contact	(a) Necessary for our legitimate interests (for running the IPIE, provision of administration and IT services, network security and to prevent fraud)	

and hosting of data)	(c) Technical	(b) Necessary to comply with a legal obligation	
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## DONORS

If you are a donor of funds, materials, services, or in-kind support to the IPIE, this section will be relevant to you.

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest	Third party processing and international transfer information
To record you as a donor	(a) Identity (b) Contact	(a) Performance of a contract (b) Necessary for our legitimate interests (to record the source of donations for administration and to develop our archive and fundraising strategies)	We engage third parties to administer document destruction services on our behalf.
To process your donation including to collect donations pledged to us	(a) Identity (b) Contact (c) Financial (d) Transaction (e) Marketing and Communications	(a) Performance of a contract (b) Necessary to comply with a legal obligation	
To manage our relationship with you which will include notifying you about changes to our terms, policies or procedures including our privacy policy	(a) Identity (b) Contact (c) Profile (d) Marketing and Communications	(a) Performance of a contract (b) Necessary to comply with a legal obligation	
To administer and protect the IPIE	(a) Identity	(a) Necessary for our legitimate interests (for	

and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	(b) Contact (c) Technical	running the IPIE, provision of administration and IT services, network security and to prevent fraud)  (b) Necessary to comply with a legal obligation
To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications (f) Technical	(a) Necessary for our legitimate interests (to study how donors interact with us, to develop our relationship with donors, to grow the IPIE and to inform our archiving and fundraising strategy)
To use data analytics to improve our website, services, marketing, customer relationships and experiences	(a) Technical (b) Usage	(a) Necessary for our legitimate interests (to define types of donor for the IPIE, to keep our website updated and relevant, to develop the IPIE and to inform our archiving and fundraising strategy)
To make suggestions and recommendations to you about events or fundraising efforts that may be of interest to you	(a) Identity (b) Contact (c) Technical (d) Usage (e) Profile	(a) Necessary for our legitimate interests (to develop the IPIE)



## GENERAL PUBLIC

If you are a member of the public or a visitor who accesses our services or facilities, this section will be relevant to you.

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest	Third party processing and international transfer information
To register you where you seek to access our publications, materials, or attend an event	(a) Identity (b) Contact	(a) Performance of a contract	Agents are engaged by us to manage and administer accommodation bookings for non- students during vacation periods.  We engage third parties to administer document destruction services on our behalf.
To deliver services, events, or access to you including:  (a) Manage payments, fees and charges  (b) Collect and recover money owed to us  (c) Providing catering	(e) Identity (f) Contact  (e) Welfare (f) Financial (g) Transaction  (h) Marketing and Communications	(b) Performance of a contract  (c) Necessary for our legitimate interests (to recover debts due to us)	
To manage our relationship with you which will include notifying you about changes to our terms or privacy policy	(a) Identity (b) Contact (c) Profile (d) Marketing and Communications	(a) Necessary to comply with a legal obligation	
To ensure safety and security at our premises	(a) Identity	(a) Necessary for our legitimate interests (in ensuring the safety and security of	
	(b) Contact	individuals and our assets on our premises)	
To administer and protect the IPIE and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of	(a) Identity (b) Contact (c) Technical	(a) Necessary for our legitimate interests (for running the IPIE, provision of administration and IT services, network security and to prevent fraud)  (b) Necessary to comply with	

data)		a legal obligation
To deliver relevant website content and marketing delivered to you and measure or understand the effectiveness of the marketing we serve to you	<ul style="list-style-type: none"> <li>(a) Identity</li> <li>(b) Contact</li> <li>(c) Profile</li> <li>(d) Usage</li> <li>(e) Marketing and Communications</li> <li>(f) Technical</li> </ul>	(a) Necessary for our legitimate interests (to understand how our visitors use our services and facilities, to develop them and to develop the IPIE)
To use data analytics to improve our website, services, marketing, public relationships, and experiences	<ul style="list-style-type: none"> <li>(a) Technical</li> <li>(b) Usage</li> </ul>	(a) Necessary for our legitimate interests (to define types of users of our events and services, to keep our website updated and relevant, to develop the IPIE)
To make suggestions and recommendations to you about events or services that may be of interest to you	<ul style="list-style-type: none"> <li>(a) Identity</li> <li>(b) Contact</li> <li>(c) Technical</li> <li>(d) Usage</li> <li>(e) Profile</li> </ul>	(a) Necessary for our legitimate interest (to develop our events and services)

## **CHANGE OF PURPOSE**

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

## **DATA SECURITY**

We have in place appropriate security measures to prevent your personal data from being accidentally lost, used, or accessed in an unapproved way, altered, or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions, and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

## **DATA RETENTION**

### **HOW LONG WILL YOU USE MY PERSONAL DATA FOR?**

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unapproved use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

By law we must keep some basic information (including Contact, Identity, Financial and Transaction Data) for pre-determined periods such as for tax purposes.

In some circumstances we may anonymize your personal data (so that it can no longer be associated with you) for research or statistical purposes, in which case we may use this information indefinitely without further notice to you.

## GLOSSARY

**Legitimate Interest** - means the interest of the IPIE in conducting and managing the IPIE to enable us to give you the best service and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law).

**Performance of Contract** - means processing your data where it is necessary for the performance of a contract or agreement to which you are a party or to take steps at your request before entering such a contract.

**Comply with a legal or regulatory obligation** - means processing your personal data where it is necessary for compliance with a legal or regulatory obligation that we are subject to.