

# Cewas Data Policy

Effective date: May 25, 2018

Welcome to our data policy! Here you will find all necessary information about the nature, scope and purpose of the personal data we collect, how we process your data and how you may opt out from our being counted by the analytics tool we use. Moreover, data subjects are informed, by means of this data protection declaration, of the rights to which they are entitled.

The processing of personal data, such as the name and e-mail address of a data subject shall always be in line with the General Data Protection Regulation (GDPR), and in accordance with the country-specific data protection regulations applicable to cewas. We use your data to provide and improve cewas.org. By using our service, you agree to the collection and use of information in accordance with this policy.

cewas has implemented numerous technical and organizational measures to ensure the most complete protection of personal data processed through this website. However, internet-based data transmissions may in principle have security gaps, so absolute protection may not be guaranteed.

## 1. Definitions

The present data use policy is based on the terms used by the European legislator for the adoption of the General Data Protection Regulation (GDPR). Our data use policy should be legible and understandable for everyone. To ensure this, we would like to first explain the terminology used. In this data use policy, we use, inter alia, the following terms:

### **Service**

By “service” we mean the cewas.org website operated by cewas, Willisau, Switzerland.

### **Personal data**

Personal data means any information relating to an identified or identifiable natural person (“data subject”). An identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, location data, an online identifier (e.g. e-mail address) of that natural person.

### **Data subject (user)**

Data subject is any identified or identifiable natural person, whose personal data is processed by the controller responsible for the processing (anyone who is using our service and is the subject of personal data).

### **Processing**

Processing is any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval,

consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

### **Usage Data**

Usage Data is data collected automatically either generated by the use of the Service or from the Service infrastructure itself (for example, the duration of a page visit).

### **Cookies**

Cookies are small pieces of data (it's a text file) stored on your device (computer or mobile device).

### **Controller responsible for the processing**

Data Controller denotes the natural or legal person who (either alone or jointly or in common with other persons) determines the purposes for which and the manner in which any personal information are, or are to be, processed. Where the purposes and means of such processing are determined by Union or Member State law, the controller or the specific criteria for its nomination may be provided for by Union or Member State law.

### **Processor**

The processor is a natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller.

### **Data Processors (or Service Providers)**

Data Processor (or Service Provider) means any natural or legal person who processes the data on behalf of the Data Controller. On cewas.org we use the services of the third-party companies Google Analytics and Mailchimp in order to process your data more effectively.

### **Recipient**

Recipient is a natural or legal person, public authority, agency or another body, to which the personal data are disclosed, whether a third party or not. However, public authorities which may receive personal data in the framework of a particular inquiry in accordance with European Union or Member State law shall not be regarded as recipients; the processing of those data by those public authorities shall be in compliance with the applicable data protection rules according to the purposes of the processing.

### **Third Party**

A third party is a natural or legal person, public authority, agency or body other than the data subject, controller, processor and persons who, under the direct authority of the controller or processor, are authorised to process personal data.

### **Consent**

Consent of the data subject is any freely given, specific, informed and unambiguous indication of the data subject's wishes by which he or she, by a statement or by a

clear affirmative action, signifies agreement to the processing of personal data relating to him or her.

## **2. Name and address of the controller**

Controller for the purposes of the General Data Protection Regulation (GDPR), other data protection laws applicable in Member states of the European Union and other provisions related to data protection is:

cewas

Müligass 7  
6130 Willisau  
Switzerland

Internet: [www.cewas.org](http://www.cewas.org)

Email: [info@cewas.org](mailto:info@cewas.org)

## **3. Types of data collected on cewas**

### **3.1. Personal Data**

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

- Email address
- First name and last name
- Cookies
- Usage Data

We may use your Personal Data to contact you with newsletters. You may opt out of receiving any, or all, of these communications from us by following the unsubscribe link or instructions provided in any email we send. Unless you specifically opt-in to our newsletter, you will not be contacted by us.

### **3.2. Usage Data**

We may also collect information how the Service is accessed and used ("Usage Data"). This Usage Data may include information such as your computer's Internet Protocol address (e.g. IP address), browser type, browser version, the pages of our Service that you visit, the time and date of your visit, the time spent on those pages, unique device identifiers and other diagnostic data.

### **3.3.Cookies**

#### **What are cookies?**

The Internet pages of cewas.org use cookies. Cookies are text files that are stored in a computer system via an Internet browser.

Cookies are small pieces of text sent to your web browser by a website you visit. A cookie file is stored in your web browser and allows the Service or a third-party to recognize you and make your next visit easier and the Service more useful to you.

Cookies can be "persistent" or "session" cookies. Persistent cookies remain on your personal computer or mobile device when you go offline, while session cookies are deleted as soon as you close your web browser.

Through the use of cookies, cewas can provide the users of this website with more user-friendly services that would not be possible without the cookie setting.

By means of a cookie, the information and offers on our website can be optimized with the user in mind. Cookies allow us, as previously mentioned, to recognize our website users. The purpose of this recognition is to make it easier for users to utilize our website. The website user that uses cookies, e.g. does not have to enter access data each time the website is accessed, because this is taken over by the website, and the cookie is thus stored on the user's computer system.

#### **How cewas uses cookies**

When you use and access the Service, we may place a number of cookies files in your web browser.

We use cookies for the following purposes:

- To enable certain functions of the Service
- To provide analytics

We use both session and persistent cookies on the Service and we use different types of cookies to run the Service:

- Essential cookies. We may use cookies to remember information that changes the way the Service behaves or looks, such as a user's language preference on the Service.
- Analytics cookies. We may use analytics cookies to track information how the Service is used so that we can make improvements. We may also use analytics cookies to test new advertisements, pages, features or new functionality of the Service to see how our users react to them.

#### **Tracking Cookies Data**

We use cookies and similar tracking technologies to track the activity on our Service and hold certain information.

Cookies are files with small amount of data which may include an anonymous unique identifier. Cookies are sent to your browser from a website and stored on your device. Tracking technologies also used are beacons, tags, and scripts to collect and track information and to improve and analyze our Service.

You can instruct your browser to refuse all cookies or to indicate when a cookie is being sent. However, if you do not accept cookies, you may not be able to use some portions of our Service.

Examples of Cookies we may use:

- **Session Cookies.** We use Session Cookies to operate our Service.
- **Preference Cookies.** We use Preference Cookies to remember your preferences and various settings.
- **Security Cookies.** We use Security Cookies for security purposes.

### **Third-party cookies**

In addition to our own cookies, we may also use various third-parties cookies to report usage statistics of the Service, deliver advertisements on and through the Service, and so on.

Currently, we use Google Analytics cookies to collect usage data and sharethis.com-cookies that enable you to share our content on social media. See section 5, subheading “Google Analytics” for details.

If you want to opt out of having third-party cookies downloaded to your computer, consult the next section “what are your choices regarding cookies”. Read on!

### **What are your choices regarding cookies**

If you'd like to delete cookies or instruct your web browser to delete or refuse cookies, please visit the help pages of your web browser.

Please note, however, that if you delete cookies or refuse to accept them, you might not be able to use all of the features we offer, you may not be able to store your preferences, and some of our pages might not display properly.

- For the Chrome web browser, please visit this page from Google: <https://support.google.com/accounts/answer/32050>
- For the Internet Explorer web browser, please visit this page from Microsoft: <http://support.microsoft.com/kb/278835>
- For the Firefox web browser, please visit this page from Mozilla: <https://support.mozilla.org/en-US/kb/delete-cookies-remove-info-websites-stored>

- For the Safari web browser, please visit this page from Apple: [https://support.apple.com/kb/PH21411?locale=en\\_US](https://support.apple.com/kb/PH21411?locale=en_US)
- For any other web browser, please visit your web browser's official web pages.

**Opting out of Google Analytics cookies:**

See the Google analytics section in chapter 5 of this data use policy. .

**Where can you find more information about cookies**

You can learn more about cookies and the following third-party websites:

- AllAboutCookies: <http://www.allaboutcookies.org/>
- Network Advertising Initiative: <http://www.networkadvertising.org/>

## **4. Use of Data**

cewas uses the collected data for various purposes:

- To provide and maintain our Service
- To notify you about changes to our Service
- To allow you to participate in interactive features of our Service when you choose to do so
- To provide customer support
- To gather analysis or valuable information so that we can improve our Service
- To monitor the usage of our Service
- To detect, prevent and address technical issues
- To provide you with news

## **5. Service Providers**

We may employ third party companies and individuals to facilitate our Service ("Service Providers"), to provide the Service on our behalf, to perform Service-related services or to assist us in analyzing how our Service 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.

## **Google Analytics**

We use third-party Service Provider Google to monitor and analyze the use of our Service. The software we use is Google Analytics.

Google Analytics is a web analytics service offered by Google that tracks and reports website traffic. Google uses the data collected to track and monitor the use of our Service. This data is shared with other Google services. Google may use the collected data to contextualize and personalize the ads of its own advertising network.

You can opt-out of having made your activity on the Service available to Google Analytics by installing the Google Analytics opt-out browser add-on. The add-on prevents the Google Analytics JavaScript (ga.js, analytics.js, and dc.js) from sharing information with Google Analytics about visits activity.

For more information on the privacy practices of Google, please visit the Google Privacy Terms web page: <http://www.google.com/intl/en/policies/privacy/>

## **Mailchimp**

When you enter your e-mail address to subscribe to our newsletter, your e-mail address is transferred by our server to Mailchimp, A US-American company that specializes in Newsletter and e-mail management. Your e-mail address is stored by Mailchimp on a US-American server. You can visit their page here: [www.mailchimp.com](http://www.mailchimp.com). Their services are very secure (fully certified) and fully comply with the EU's GDPR.

## **6. Legal basis for processing personal data under General Data Protection Regulation (GDPR)**

If you are from the European Economic Area (EEA), seecon international gmbh's legal basis for collecting and using the personal information described in this data use policy is [Art. 6\(1\) lit. a](#) GDPR.

cewas may process your Personal Data because:

- You have given us permission to do so
- The processing is in our legitimate interests and it's not overridden by your rights
- To comply with the law

## **7. Retention of Data**

cewas will retain your personal data only for as long as is necessary for the purposes set out in this data use policy. We will retain and use your Personal Data to the extent necessary to comply with our legal obligations (for example, if we are required to retain your data to comply with applicable laws), resolve disputes, and enforce our legal agreements and policies.

cewas will also retain Usage Data for internal analysis purposes. Usage Data is generally retained for a shorter period of time, except when this data is used to strengthen the security or to improve the functionality of our Service, or we are legally obligated to retain this data for longer time periods.

## **8. Period for which the personal data will be stored**

There is no automatic deletion of user data. cewas will, of course, honor any request to permanently delete and stop public display of such data by means of an e-mail to [info@cewas.org](mailto:info@cewas.org). Such request may take up to 4 weeks to process.

## **9. Security of data**

The security of your data 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 Data, we cannot guarantee its absolute security.

cewas will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this data use policy and no transfer of your Personal Data will take place to an organization or a country unless there are adequate controls in place including the security of your data and other personal information.

## **10. Transfer of Data**

Your information, including Personal Data, may be transferred to — and maintained on — computers located outside of your state, province, country or other governmental jurisdiction where the data protection laws may differ than those from your jurisdiction.

If you are located outside Switzerland and choose to provide information to us, please note that we transfer the data, including personal data, to Switzerland and the Netherlands and Estonia and process it there.

Your consent to this Data Use Policy followed by your submission of such information represents your agreement to that transfer.

## **11. Disclosure of Data**

### **Disclosure for Law Enforcement**

Under certain circumstances, cewas may be required to disclose your Personal Data if required to do so by law or in response to valid requests by public authorities (e.g. a court or a government agency).

### **Legal Requirements**

cewas may disclose your Personal Data in the good faith belief that such action is necessary to:

- To comply with a legal obligation
- To protect and defend the rights or property of cewas
- To prevent or investigate possible wrongdoing in connection with the Service
- To protect the personal safety of users of the Service or the public
- To protect against legal liability

## **12. Routine erasure and blocking of personal data**

The data controller shall process and store the personal data of the data subject only for the period necessary to achieve the purpose of storage, or as far as this is granted by the European legislator or other legislators in laws or regulations to which the controller is subject to.

If the storage purpose is not applicable, or if a storage period prescribed by the European legislator or another competent legislator expires, the personal data are routinely blocked or erased in accordance with legal requirements.

## **13. Subscription to our newsletters**

On the website of cewas, users are given the opportunity to subscribe to our newsletter. Your e-mail address, as well as your IP-address, time and date of your subscription is sent to Mailchimp.com, our newsletter service provider located in the United States of America.

When you enter your e-mail address and click “subscribe”, you agree to receive news, updates on our activities and cewas-related training suggestions and announcements. Your e-mail address is not used for any other purpose. We never sell your e-mail address to any company. These newsletters may only be received by the data subject if (1) the data subject has a valid e-mail address and (2) the data subject registers for the newsletter shipping on the website.

During the registration for the newsletter, we also store the IP address of the computer system assigned by the Internet service provider (ISP) and used by the data subject at the time of the registration, as well as the date and time of the

registration. The collection of this data is necessary in order to understand the (possible) misuse of the e-mail address of a data subject at a later date, and it therefore serves the aim of the legal protection of the controller.

The subscription to our newsletter may be terminated by the data subject at any time. The consent to the storage of personal data, which the data subject has given for shipping the newsletter, may be revoked at any time. For the purpose of revocation of consent, a corresponding link is found in each newsletter. It is also possible to unsubscribe from the newsletter at any time directly on the website of the controller, or to communicate this to the controller in a different way.

## **14. Newsletter-Tracking**

The cewas-newsletters contain so-called tracking pixels. A tracking pixel is a miniature graphic embedded in such e-mails, which are sent in HTML format to enable log file recording and analysis. This allows a statistical analysis of the success or failure of online marketing campaigns. Based on the embedded tracking pixel, provided for by Mailchimp, the cewas-team may see if and when an e-mail was opened by a data subject, and which links in the e-mail were called up by data subjects.

Such personal data collected in the tracking pixels contained in the newsletters are stored and analyzed by the controller in order to optimize the shipping of the newsletter, as well as to adapt the content of future newsletters even better to the interests of the data subject. These personal data is transmitted and handled by Mailchimp, our newsletter service provider. Mailchimp may access this Personal Data, according to [their privacy policy](#). After a data subject's consent revocation, these personal data will be deleted by the controller. cewas automatically regards a withdrawal from the receipt of the newsletter as a revocation.

## **15. Contact possibility via the website**

The cewas website contains information that enables a quick electronic contact to the secretariat (info@cewas.org), which also includes a general address of the so-called electronic mail (e-mail address). If a data subject contacts the controller by e-mail or via a contact form, the personal data transmitted by the data subject are automatically stored. Such personal data transmitted on a voluntary basis by a data subject to the data controller are stored for the purpose of processing or contacting the data subject. There is no transfer of this personal data to third parties.

## **16. Links to other sites**

Our Service may contain links to other sites that are not operated by us. If you click on a third party link, you will be directed to that third party's site. We strongly advise you to review the Privacy Policy of every site you visit. We have no control over and

assume no responsibility for the content, privacy policies or practices of any third party sites or services.

## **17. Rights of the data subject**

### **Right of confirmation**

Each data subject shall have the right granted by the European legislator to obtain from the controller the confirmation as to whether or not personal data concerning him or her are being processed. If a data subject wishes to avail himself of this right of confirmation, he or she may, at any time, contact any employee of the controller.

### **Right of access**

Each data subject shall have the right granted by the European legislator to obtain from the controller free information about his or her personal data stored at any time and a copy of this information. Furthermore, the European directives and regulations grant the data subject access to the following information:

- the purposes of the processing;
- the categories of personal data concerned;
- the recipients or categories of recipients to whom the personal data have been or will be disclosed, in particular recipients in third countries or international organisations;
- where possible, the envisaged period for which the personal data will be stored, or, if not possible, the criteria used to determine that period;
- the existence of the right to request from the controller rectification or erasure of personal data, or restriction of processing of personal data concerning the data subject, or to object to such processing;
- the existence of the right to lodge a complaint with a supervisory authority;
- where the personal data are not collected from the data subject, any available information as to their source;
- the existence of automated decision-making, including profiling, referred to in Article 22(1) and (4) of the GDPR and, at least in those cases, meaningful information about the logic involved, as well as the significance and envisaged consequences of such processing for the data subject.

Furthermore, the data subject shall have a right to obtain information as to whether personal data are transferred to a third country or to an international organisation. Where this is the case, the data subject shall have the right to be informed of the appropriate safeguards relating to the transfer.

If a data subject wishes to avail himself of this right of access, he or she may, at any time, contact any employee of the controller.

## **Right to rectification**

Each data subject shall have the right granted by the European legislator to obtain from the controller without undue delay the rectification of inaccurate personal data concerning him or her. Taking into account the purposes of the processing, the data subject shall have the right to have incomplete personal data completed, including by means of providing a supplementary statement.

If a data subject wishes to exercise this right to rectification, he or she may, at any time, contact any employee of the controller.

## **Right to erasure (Right to be forgotten)**

Each data subject shall have the right granted by the European legislator to obtain from the controller the erasure of personal data concerning him or her without undue delay, and the controller shall have the obligation to erase personal data without undue delay where one of the following grounds applies, as long as the processing is not necessary:

- The personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed.
- The data subject withdraws consent to which the processing is based according to point (a) of Article 6(1) of the GDPR, or point (a) of Article 9(2) of the GDPR, and where there is no other legal ground for the processing.
- The data subject objects to the processing pursuant to Article 21(1) of the GDPR and there are no overriding legitimate grounds for the processing, or the data subject objects to the processing pursuant to Article 21(2) of the GDPR.
- The personal data have been unlawfully processed.
- The personal data must be erased for compliance with a legal obligation in Union or Member State law to which the controller is subject.
- The personal data have been collected in relation to the offer of information society services referred to in Article 8(1) of the GDPR.

If one of the aforementioned reasons applies, and a data subject wishes to request the erasure of personal data stored by cewas or on cewas service providers, he or she may, at any time, contact any employee of the controller. All employees of the cewas secretariat shall promptly ensure that the erasure request is complied with immediately.

Where the controller has made personal data public and is obliged pursuant to Article 17(1) to erase the personal data, the controller, taking account of available technology and the cost of implementation, shall take reasonable steps, including technical measures, to inform other controllers processing the personal data that the data subject has requested erasure by such controllers of any links to, or copy or

replication of, those personal data, as far as processing is not required. A cewas employee will arrange the necessary measures in individual cases.

### **Right of restriction of processing**

Each data subject shall have the right granted by the European legislator to obtain from the controller restriction of processing where one of the following applies:

- The accuracy of the personal data is contested by the data subject, for a period enabling the controller to verify the accuracy of the personal data.
- The processing is unlawful and the data subject opposes the erasure of the personal data and requests instead the restriction of their use instead.
- The controller no longer needs the personal data for the purposes of the processing, but they are required by the data subject for the establishment, exercise or defence of legal claims.
- The data subject has objected to processing pursuant to Article 21(1) of the GDPR pending the verification whether the legitimate grounds of the controller override those of the data subject.

If one of the aforementioned conditions is met, and a data subject wishes to request the restriction of the processing of personal data stored by cewas or on cewas accounts of our service providers, he or she may at any time contact any employee of the controller. The employee of the cewas secretariat will arrange the restriction of the processing.

### **Right to data portability**

Each data subject shall have the right granted by the European legislator, to receive the personal data concerning him or her, which was provided to a controller, in a structured, commonly used and machine-readable format. He or she shall have the right to transmit those data to another controller without hindrance from the controller to which the personal data have been provided, as long as the processing is based on consent pursuant to point (a) of Article 6(1) of the GDPR or point (a) of Article 9(2) of the GDPR, or on a contract pursuant to point (b) of Article 6(1) of the GDPR, and the processing is carried out by automated means, as long as the processing is not necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller.

Furthermore, in exercising his or her right to data portability pursuant to Article 20(1) of the GDPR, the data subject shall have the right to have personal data transmitted directly from one controller to another, where technically feasible and when doing so does not adversely affect the rights and freedoms of others.

In order to assert the right to data portability, the data subject may at any time contact any employee of the cewas secretariat.

### **Right to object**

Each data subject shall have the right granted by the European legislator to object, on grounds relating to his or her particular situation, at any time, to processing of personal data concerning him or her, which is based on point (e) or (f) of Article 6(1) of the GDPR.

cewas shall no longer process the personal data in the event of the objection, unless we can demonstrate compelling legitimate grounds for the processing which override the interests, rights and freedoms of the data subject, or for the establishment, exercise or defence of legal claims.

In addition, the data subject has the right, on grounds relating to his or her particular situation, to object to processing of personal data concerning him or her by cewas for scientific or historical research purposes, or for statistical purposes pursuant to Article 89(1) of the GDPR, unless the processing is necessary for the performance of a task carried out for reasons of public interest.

In order to exercise the right to object, the data subject may contact any employee of the cewas secretariat. In addition, the data subject is free in the context of the use of information society services, and notwithstanding Directive 2002/58/EC, to use his or her right to object by automated means using technical specifications.

#### **Automated individual decision-making, including profiling**

Each data subject shall have the right granted by the European legislator not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning him or her, or similarly significantly affects him or her, as long as the decision (1) is not necessary for entering into, or the performance of, a contract between the data subject and a data controller, or (2) is not authorised by Union or Member State law to which the controller is subject and which also lays down suitable measures to safeguard the data subject's rights and freedoms and legitimate interests, or (3) is not based on the data subject's explicit consent.

If the decision (1) is necessary for entering into, or the performance of, a contract between the data subject and a data controller, or (2) it is based on the data subject's explicit consent, cewas shall implement suitable measures to safeguard the data subject's rights and freedoms and legitimate interests, at least the right to obtain human intervention on the part of the controller, to express his or her point of view and contest the decision.

If the data subject wishes to exercise the rights concerning automated individual decision-making, he or she may, at any time, contact any employee of the cewas secretariat.

cewas does not use automatic decision-making or profiling and does not plan to in the future.

#### **Right to withdraw from data protection consent**

Each data subject shall have the right granted by the European legislator to withdraw his or her consent to processing of his or her personal data at any time.

If the data subject wishes to exercise the right to withdraw the consent, he or she may, at any time, contact any employee of the cewas secretariat.

## **18. Changes to this data use policy**

We may update our data use policy from time to time. We will notify you of any changes by posting the new data use policy on this page.

We will let you know via email and/or a prominent notice on our Service, prior to the change becoming effective and update the "effective date" at the top of this data use policy.

You are advised to review this data use policy periodically for any changes. Changes to this data use policy are effective when they are posted on this page.

## **19. Contact Us**

If you have any questions about this data use policy, please contact us:

- By email: [info@cewas.org](mailto:info@cewas.org)
- By visiting this page on our website: <https://www.cewas.org/contact>
- By phone: +41(0)61 261 40 04 (Switzerland)
- By snail mail: cewas Müligass 7, 6130 Willisau, Switzerland