

External Privacy Policy

Adopted by the Board of Trustees 27 May 2019

1. Introduction

Your personal integrity is important to us at the Raoul Wallenberg Institute of Human Rights (hereafter "RWI"). In accordance with the General Data Protection Regulation (EU 2016/679) (hereafter "GDPR"), which has been in force since 25th of May 2018, you have the right to receive certain information about personal data we process about you. With this *Privacy Policy*, we aim to inform you of our processing of personal data and the rights which you possess.

It is important that you read our policy and feel comfortable with the processing we conduct. If there are any questions you are always welcome to contact us.

2. RWI is responsible for your personal data

As a data controller RWI (organisation number 845001-3548) will take adequate steps to ensure the protection of your personal integrity during the processing of your personal data in accordance with current data protection laws and the personal data policy of the RWI.

You can contact us in case of any questions at privacy@rwi.lu.se.

3. Policy Statement

In this policy RWI aims to explain how we process personal data you share with us.

4. Definitions

Personal data – Any information relating to an identified or identifiable natural person. An identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier.

Processing – Any operation or set of operations which is performed on personal data, such as collection, recording, storage, adaption or alteration, consultation, disclosure, erasure, etc.

5. Processing of personal data

How do we collect your personal data?

Most of the personal data that we process about you have been given to us by you in conjunction with courses, activities or applications. Sometimes we need additional information to be able to carry out our services or to be able to fulfil our legal obligations. We will inform you of this, at the latest, when the data is collected.

Why, for how long, and on what legal grounds do we process your personal data?

RWI only collects the personal data necessary and relevant for the applicable processing of personal data. We process your personal data to be able to carry out our obligations towards you, but also to be able to fulfil legal obligations.

Your personal data will be processed for the time it is necessary to fulfil the purpose of the processing. If the processing is based on consent, the personal data will be erased if the consent is withdrawn. If the processing is based on a contract, the personal data will be erased when the contract is fulfilled. Please note, some personal data may be processed for a longer period if there is a legal obligation to do so, or a legitimate interest.

We process personal data for different data subjects and for different reasons, such as:

When do we collect your personal data?	Why do we collect your personal data?	What legal ground do we use?	Retention period
When you apply for a job or send in a spontaneous job application	<ul style="list-style-type: none"> To enable recruiting processes. To defend legal claims. 	Consent / legitimate interest	2 years*
When you apply for a scholarship	<ul style="list-style-type: none"> To be able to grant scholarships. 	Consent / contract	3 months after choosing grant recipients
When contacting you as representative of a prospective cooperation partner or agreement partner	<ul style="list-style-type: none"> To be able to evaluate and enter into an agreement with the organization. 	Legitimate interest	6 months after last contact
In cooperation with Lund University Research Hub	<ul style="list-style-type: none"> To be able to cooperate and create the platform for Human Rights Research. 	Consent / legitimate interest	A maximum of 1 year after last activity
As subscriber to our newsletter	<ul style="list-style-type: none"> To be able to send newsletters and press releases. 	Consent	Removed immediately after the consent is withdrawn
As a participant in our programmes	<ul style="list-style-type: none"> To be able to administer participation in the programme. To be able to administer fees and payments. To be able to publish on social media. To be able to communicate with participants. 	Legal obligation / contract Legitimate interest	Up to 7 years to comply with legal obligations

As a participant of our podcast	<ul style="list-style-type: none"> To be able to publish the podcast episode. 	Legitimate interest	The lifetime of the podcast
As a student at RWI	<ul style="list-style-type: none"> To administer the student. To fulfil our legal obligations. To grade students. 	Contract / legal obligation	6 months after end of study period or inactivity (grades are saved forever)
As the contact person of a sub-contractor, cooperation partner or agreement partner	<ul style="list-style-type: none"> To be able to enter into or fulfil an agreement. To be able to administer payments and invoices. 	Legitimate interest	10 years after termination of the agreement
As our employee or an employee of Lund University or a researcher	<ul style="list-style-type: none"> See the <i>Privacy Regulation regarding Employees</i>. To be able to communicate with researchers and publish their publications. 	Contract	6 months after the end of the project
During other contacts which you have initiated or during participating in one of our numerous activities	<ul style="list-style-type: none"> Manage requests and provide you with information. Inform you of our business. 	Legitimate interest	You will be informed on a case by case, depending on the question**
As a member of the board	<ul style="list-style-type: none"> To be able to carry out their commitments 	Legal obligation / legitimate interest	As long as the legal obligation or historical legitimate interest allows
If you are a resource person	<ul style="list-style-type: none"> To be able to connect resource persons. Publishing on social media. Necessary permits (e.g. work permits). 	Legitimate interest / legal obligation / contract	For the duration of the contract or longer if based on legitimate interest, or legal obligation – according to each regulation or purpose.

**Applicants for jobs* – name, address, email, telephone, education, date of birth, sex, cover letter, CV, personal number, title, work certificate, personal characteristics (until a candidate has been chosen or the consent is withdrawn)

* *Rejection of job applicant* – name, address, email, reasons for rejection, notes from job interview (2 years after choosing a candidate)

**External contacts regarding questions and discussions not covered above – name, address, email, telephone, affiliation, title (as soon as the matter is resolved or 12 months after last contact, at the latest).

Who has access to my personal data?

As a part of our organisational security we make sure to limit access by ensuring that only the staff that needs it have access to your personal data.

The subcontractors (data processors) we hire for IT-services, email programs, cloud services, etc. are under obligation to follow our instructions (DPA), in accordance with GDPR, Privacy Shield where applicable and this Privacy Policy. RWI may also transfer your personal data to an authority if there is a legal obligation to do so.

Some of our activities extend outside the EU/EEA ("third country"). For the processing of your personal data that may be outside of this area, we have taken appropriate protection measures in order to reach as high a level of protection as possible. We will inform you if your personal data is transferred outside of the EU/EEA.

6. Your rights

You have certain rights to information and control over our processing of personal data. These rights include:

The right to access

You have the right to transparent processing, which means that you can request to receive certain information about the processing. You also have a right to obtain a copy of the personal data we process that relate to you as well as certain additional information (transcript of record-keeping).

The right to rectification

You have the right to obtain rectification of inaccurate personal data and to complete incomplete data if it is relevant to the purposes of the processing.

The right to erasure

You have the right to request erasure (*the right to be forgotten*) of your personal data in the following cases:

- If the personal data are no longer necessary in relation to the purposes for which they were collected
- If you withdraw the consent on which the processing is based
- If the personal data have been unlawfully processed
- If the personal data must be erased for compliance with a legal obligation.

RWI has the right to refuse erasure, in the event of a legal obligation to continue the processing of your personal data, to be able to carry out a task in the public interest and to be able to determine, claim or defend legal obligations toward you.

The right to object

You have the right to object to the processing of your personal data if the processing is based on our legitimate interests or if the data is used for Direct Marketing.

The right to restriction

You have the right to request that you obtain a restriction of processing from us if you contest the accuracy of the personal data for the time it takes for us to check the accuracy of

the data, the legality of the processing, make claims or defend legal claims or when the processing is based on our legitimate interests.

The right to data portability

You have a right to receive the personal data concerning you which you have provided to us, and to have it transmitted to another data controller if the processing is based on an agreement or on consent or when the processing is carried out by automated means.

7. Contacts

To be able to answer your requests as quickly as possible we ask that you first contact our Privacy Officer (privacy@rwi.lu.se). We will answer your request as soon as possible, but always within one (1) month of receiving it. In order for us to protect your rights, we do however first need to be able to correctly identify you.

If you are of the opinion that RWI does not process your personal data correctly or in accordance with GDPR you are entitled to contact The Swedish Data Protection Authority (*Datainspektionen*) to register a complaint (<https://www.datainspektionen.se/kontakta-oss/>).

8. Technical and organisational security measures

RWI cares deeply about your integrity and is constantly working towards implementing technical and organisational measures appropriate in each individual case to protect your personal data and to ensure that the processing complies with data protection regulations.

9. Policy Review

RWI will continuously reviewt this personal data policy and update it when necessary. You will find our current personal data policy on our homepage (<https://rwi.lu.se>).

10. Version Control

Document History and Version Control Table			
Version	Action	Approval Authority	Action Date
1.00	Document drafted by Deputy Director, and adopted by the Board of Trustees	Board of Trustees	2019-05-27