

CONSUMERS INTERNATIONAL'S PRIVACY POLICY

This privacy policy explains what personal information Consumers International collect, how it is collected and why we collect it. It also contains information about our data retention processes and details of the third-party providers that we use to provide the services outlined in this privacy policy.

When we refer to “we” or “us” in this policy we are referring to Consumers International. We are a charity (No.1122155) and a not-for-profit company limited by guarantee (No. 04337865) registered in England and Wales. Our address is 24 Highbury Crescent, London N5 1RX.

For the purposes of the Data Protection Act 2018, the General Data Protection Regulation (GDPR) and any applicable replacement legislation, we are the data controller.

If you are reading this policy because you are concerned with a privacy issue that is not covered by this document, please contact us on consint@consint.org.

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2. Scope of policy

We are committed to respecting your privacy, protecting your personal information and collecting the minimum amount of personal information required to ensure that we deliver the best possible experience across all of our platforms and services.

In this policy we use the term **personal information** to mean any information you give us from which you can be identified. This might include your name, your home address, your personal email contact details, or your telephone number. Personal information does not include information where your identity has been removed (i.e. anonymous data).

3. Privacy principles

We are committed to the following privacy principles:

Accurate, accessible information

- Providing easy to access, accurate and understandable information about our privacy practices.
- Dated policies so users are aware of how recently that policy has been updated.

Choice

- Where appropriate, giving you the opportunity to opt out of receiving emails from us by following the instructions contained within the communication.
- Providing clear information on the impact that the collection and use of your personal information by third parties will have (e.g. cookies).
- Ensuring that you have the relevant information to make an informed choice about data sharing and the tools at your disposal to enact that choice.

Data

- Transparency on what personal information is collected, how it is stored and used.
- We only process personal information lawfully and fairly.
- We do not sell your personal information or rent it out to third parties who might use it for their own commercial purposes.
- We will only share your personal information with external agencies in the ways set out in our Privacy Notice.
- We only keep personal information for as long as necessary to fulfil the purposes we collected it for (for example, to satisfy any legal, accounting, or reporting requirements) or where we have legitimate interests to do so.
- If you unsubscribe from e-communications, the personal information you've submitted will be permanently deleted, with the exception of your email address which will be retained to ensure that you are not re-subscribed to our mailing lists.

Security

- We will process your personal information in a manner that ensures appropriate security, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures.

4. What personal information does Consumers International collect?

4.1 Visitors to our website

We do not collect personal information about individual visitors to our website (www.consumersinternational.org). Site activity is monitored through the use of cookies which collect anonymous, aggregate information such as:

- Total number of visits to the site
- Time spent by users on individual pages
- Users' country of origin and other top-level domains
- Downloads of papers and publications

Please see the cookies section below for more information. You can view our [full Cookies policy here](#).

If you fill in a form on our website, for example, to register your interest in an event or to receive e-communications from us, we will ask you to provide the following personal information:

- First name (optional)
- Second name (optional)
- Email address
- Preferred language

- Job title (optional)
- Organisation (optional)
- Whether your organisation is a Consumers International member
- Country
- Region

We will ask for your consent to use this information to provide the communications, to personalise the service we provide to you as an individual (for example, to ensure that communications you receive are in your preferred language) and to fulfil our service to our member organisations.

Although we use appropriate security measures once we have received your personal information, the transmission of information over the internet is never completely secure. We do our best to protect personal information, but we cannot guarantee the security of information transmitted to our website, so any transmission is at your own risk.

Our website includes links and buttons to other websites, including popular social sharing sites, to make sure we can get our information and news out to as many people as possible. We are not responsible for how third-party websites might use your personal information.

4.2 Visitors to our Digital Policy Index microsite

Our [Digital Policy Index microsite](#) enables users to submit new policy suggestions to be added to the Index. When you submit a policy suggestion, we ask you to provide the following information:

- Full name
- Email address
- Job title
- Organisation
- Details relating to the policy, including country, region, type, title, description, link.

We will use this information to contact you if we have a legitimate interest to do so, for example, to ask you to provide further information or clarification about your submission. We will only retain this information for as long as is reasonable and necessary for these purposes.

4.3 Events

We will collect personal information from you when you sign up to attend one of our events. We will send you a separate privacy policy when you make a booking.

If we arrange accommodation and travel to an event on your behalf, we may ask you to provide specific personal information such as a copy of your passport. We may also need to share this information with third parties such as a hotel, travel company or airline. We will only collect and use your personal information in this way if we are satisfied that we have legitimate interest to do so in order to provide this service and to make the booking for you.

4.4 Members

We use personal information of employees at our member organisations where it is necessary to perform the membership contract (for example, to contact members with information about invoicing requirements) or where we have a legitimate interest to do so, for example:

- to keep members informed about opportunities for connecting, learning from, and sharing information with other Consumers International member organisations;
- to share exclusive content with members, including new research and campaign resources;
- to notify members about how they can apply for grants that Consumers International administers;
- to ensure members are updated on important announcements and information relating to Consumers International's governance, strategic direction and organisation aims;

- to personalise our services to ensure that communications members receive are as they would expect (for example, in their preferred language).

We will ask for your consent to process your personal information in some circumstances, for example, if we feel we do not have a legitimate interest.

4.5 Projects

We operate a number of projects through which we also collect and process personal information. We use personal information where it is necessary to carry out the requirements of these projects, or where we have a legitimate interest to do so, for example:

- when a user subscribes to our project email discussion lists
- when we process legal information from our donors and partners
- when we process personal information from our members who are applying for, or receiving, grants
- when we process the personal information of consultants who help us to deliver our projects

If you sign up to take part in a project as a corporate subscriber, we may send you marketing communications by email where we have a legitimate interest to do so. If you take part in a project as an [individual](#) subscriber, we will only send you marketing communications by email if you have given us consent to do so.

You can opt out of email marketing either by clicking the 'unsubscribe' link at the bottom of our emails, or by contacting us at consint@consint.org at any time to opt out, change your contact details or to update your communication preferences.

4.6 Trans Atlantic Consumer Dialogue website

We are responsible for the Trans Atlantic Consumer Dialogue (TACD) website - <http://tacd.org>. When we collect and process your personal information via this website, we are committed to the same privacy principles outlined in Section 3 of this privacy policy.

The TACD website does not analyse personal information about visitors' activities on the site. Personal information will only be stored when website visitors leave comments on TACD articles. In which case your IP address and name used when submitting your comment will be stored, but not used for any other purpose. TACD does not store any cookies on its website.

4.7 Email marketing

We also collect personal information from non-members who consent to receive email marketing from us, for example, people subscribe to our monthly eNewsletter.

When you fill out our [Email News sign up form](#), you are asked to give us consent to use your personal information to provide you with timely e-communications.

You can update your preferences or unsubscribe from our e-communications at any point, either by clicking on the links at the footer of an email you receive from us, or by emailing consint@consint.org.

5. How is personal information collected?

We collect personal information about you in the following ways:

- via cookies on our website;
- when you give us your personal information directly (for example, by filling in a form on our website);

- when we receive your personal information from a third party (for example, if your employer is a member of Consumers International and they ask us to contact you).

5.1 Cookies

Cookies are text files containing small amounts of information which are downloaded to your device when you visit a website. Cookies are then sent back to the originating website on each subsequent visit, or to another website that recognises that cookie. Cookies are widely used because they allow a website to recognise a user's device and therefore allow enhanced functionality.

To find out more about what cookies Consumers International use, how and why we use them please refer to our Cookies Policy which can be found [here](#).

5.2 Personal information we receive from you

If you use the [Email News sign up form](#) on our website to sign up to receive communication updates from us, the information you provide will be stored on a private database within our email service provider, Mailchimp. We also store personal information from our members, donors and other stakeholders in our CRM database, Salesforce.

To see the privacy policy and practices our database provider, Salesforce, adheres to, please see [here](#). To see the privacy policy and practices our email service provider adheres to, please see [here](#).

6. Third parties

We will only disclose your personal information to third parties:

- where you have given us consent to share the information with the specific third party (for example, our market research provider who we commission to deliver our Member Insight surveys);
- where information such as your email address is accessible to our IT suppliers, including EPIC IT, BrandEx, Both Associates and DoGooder who provide technical support;
- Where we use a third party to arrange travel and accommodation to facilitate participants to attend events or meetings
- where we use a third-party supplier in order to deliver a service to you, as set out in this privacy policy (for example, Mailchimp, our Email service provider);
- if we are under a legal duty to disclose or share your personal information, for example, if required to do so by a court order or for the purposes of prevention of fraud or other crime;
- in order to enforce any terms and conditions or agreements between us;
- as part of a sale of some or all of our business and assets to any third party, on a temporary or permanent basis, for the purposes of a joint venture, collaboration, sale, merger, reorganisation, change of legal form, dissolution or similar event (we will always notify you in advance and we will aim to ensure that your privacy rights will continue to be protected); or
- to protect our rights, property and safety, or the rights, property and safety of others (this includes exchanging information with other companies, organisations and regulators for the purposes of fraud protection and credit risk reduction).

In some circumstances we may anonymise your personal information so that it can no longer be associated with you, in which case we may use such information without further notice to you. For example, we may share anonymised results of research that we carry out into the use of our services with third parties such as funders.

Third parties that enhance our website services are listed below with links to their privacy policies:

| Third party | Website service | Privacy policy |
|--------------------|--|---|
| Umbraco * | Our content management system | https://umbraco.com/about-us/privacy/ |
| Simple Lists * | Email discussion group | https://www.simplelists.com/privacy.php |
| cPanel * | TACD email discussion group | https://cpanel.com/privacy-policy.html |
| MailChimp * | Email service provider | https://mailchimp.com/legal/privacy/ |
| Google Analytics | Performance analysis | https://www.google.com/policies/privacy/ |
| Google Tag Manager | Performance analysis | https://www.google.com/policies/privacy/ |
| Salesforce * | Database | https://www.salesforce.com/uk/company/privacy/ |
| DoGooder * | Webforms and surveys | https://dogooder.co/privacy |
| Survey Monkey * | Surveys | https://www.surveymonkey.com/mp/legal/privacy-policy/ |
| Add This | Sharing content on social networks | http://www.addthis.com/privacy/privacy-policy |
| Facebook | Sharing content on social networks | https://www.facebook.com/about/basics/ukr1 |
| Twitter | Sharing content on social networks | https://twitter.com/privacy?lang=en |
| YouTube | Sharing media content on social networks | https://www.youtube.com/static?template=privacy_guidelines&gl=GB |
| LinkedIn | Sharing content on social networks | https://www.linkedin.com/legal/privacy-policy |
| Google+ | Sharing content on social networks | https://www.google.com/+/policy/pagesterm.html |
| Pinterest | Sharing media content on social networks | https://about.pinterest.com/en/privacy-policy |

A red asterix * signifies which third party platforms process personal information on behalf of Consumers International

7. Data retention

We will only retain your personal information 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 information, we consider the amount, nature, and sensitivity of the information, the potential risk of harm from unauthorised use or disclosure of your personal information, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

Our default retention period for personal data is 7 years from the date we receive the information, unless otherwise specified by law. If you have unsubscribed from one of our email communication services, your personal information will be deleted, with the exception of your email address which will be retained to ensure that you are not re-subscribed to our mailing lists.

These retention periods may be extended or reduced if we deem it necessary, for example, to defend legal proceedings or if there is an on-going investigation relating to the information.

10. International transfers

We may transfer the personal information you give us to countries outside the European Economic Area (EEA), specifically:

- to MailChimp, our email service provider – servers based in the United States of America
- to DoGooder, our survey and webform platform – servers based in the United States of America
- to SurveyMonkey, our survey platform – servers may be based in the United States of America
- to donors, based outside the EEA, who we work with to deliver specific projects
- to Diversity Travel, our preferred travel agency, who provide support to Consumers International for participants travelling to events and meetings that may be outside of the EEA
- to relevant hotels where we are securing accommodation for participants travelling to events and meetings that may be outside of the EEA
- for legal and accountancy purposes, specifically for overseas operations / auditing purposes at our regional offices in Africa, Asia, the Middle East and in South America.

If we transfer your information outside of the EEA in this way, and the country in question has not been deemed by the EU Commission to have adequate data protection laws, we will provide appropriate safeguards and we will be responsible for ensuring your privacy rights continue to be protected as outlined in this notice.

11. Your rights

Under certain circumstances, by law you have the right to:

- **Request access** to your personal information (commonly known as a "data subject access request"). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.
- **Ask us to correct personal information** that we hold about you which is incorrect, incomplete or inaccurate.
- **Ask us to erase your personal information** from our files and systems where there is no good reason for us continuing to hold it.
- **Object to us using your personal information** to further our legitimate interests (or those of a third party) or where we are using your personal information for direct marketing purposes.

- **Ask us to restrict or suspend the use of your personal information**, for example, if you want us to establish its accuracy or our reasons for using it.
- **Ask us to transfer your personal information** to another person or organisation.

You also have rights in relation to **automated decision making** which has a legal effect or otherwise significantly affects you. However, we do not carry out any automated processing, which produces significant legal effects concerning you.

If you want to exercise any of these rights, please contact Kate Scott, HR and Office Manager, kscott@consint.org. Written correspondence must be sent to our [London office address](#).

If you have given your **consent to us processing your personal information**, you have the right to withdraw your consent at any time. To withdraw your consent, please contact please contact Kate Scott, HR and Office Manager, kscott@consint.org. Written correspondence must be sent to our [London office address](#).

Once we have received notification that you have withdrawn your consent, we will no longer process your personal information for those purposes.

12. Queries and complaints

If you want to find out more about Consumers International's privacy policy, please contact us at consint@consint.org.

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues.