

# PRIVACY POLICY

The Better Governance Project respects and values your privacy. This Privacy Policy applies to information we (The Better Governance Project) collect about individuals who interact with our organisation. It explains what personal information we collect and how we use it.

All personnel with a role in TBGP are expected to uphold this policy. As a living document, this policy can be revised, with any revision be approved by the Governing Board.

This is version n. 1, approved by the Board on and effective from 17.01.2022.

Please reach out to us at [info@bettergovernance.se](mailto:info@bettergovernance.se) if you have any question pertaining this policy or how we collect, store, and/or use your information.

## 1. Personal data that we process

The following table explains the types of data we collect and the legal basis, under current data protection legislation, on which this data is processed.

*Table 1 Data, purpose and legal basis for processing*

Purpose	Periodicity	Data (key elements)	Basis
1. Enquiring about our organisation and its work	Ad-hoc	Name, email, phone, message	Legitimate interests - it is necessary for us to read and store your message so that we can respond in the way that you would expect.
2. Subscribing to our newsletter (email updates about our work and other relevant information)	Maximum twice per month	Name, email	Consent - you have given your active consent.
3. Making a donation – private person	Ad-hoc	Name, email, address, payment information	Legitimate interests - this information is necessary for us to fulfil your intention of donating money and your expectation of receiving a confirmation message.
4. Making a donation or grant - organisation	Ad-hoc	Name, email, address, payment information	Legitimate interests - this information is necessary for us to fulfil your intention of making a donation or grant, your expectation of receiving a confirmation message and following up.
5. Signing up as a member	Ad-hoc	Name, email, phone	Contract - by paying your membership fees you have entered into a contractual relationship with us as set out in our membership terms and conditions.
6. Working with us – as an individual expert	Ad-hoc	Name, email, phone, CV, cover letters, pen portraits, professional references, information about	Legitimate interests - it is necessary for us to read and store your CV and personal data so that we can respond and contact you regarding work or collaboration opportunities.

		previous work with TBGP	
7. Working with us – as an organisation	Ad-hoc	Name, email, phone, position, information about the organisation, collaboration history	Legitimate interests - it is necessary for us to read and store your information so that we can respond and contact you regarding work or collaboration opportunities.
8. Governance research	Ad-hoc	Name, position, contact information, social media, links to reports and newspaper articles	Legitimate interests - For the purposes of fulfilling the organisations mission to strengthen governance, we need to carry out research on individuals in positions of public responsibility, largely from publicly available sources
9. Website functionality	Ad-hoc	Website activity collected through cookies	<p>Legitimate interests - it is necessary for us to store a small amount of information, usually through cookies, to deliver functionality that you would expect, such as remembering the contents of your order before you have fully completed the process.</p> <p>We may also collect IP addresses, domain names, and similar items regarding users of this site to measure the number of visits, pages visited, average time spent on this site, and similar items using tools such as Google Analytics. We use this data only to serve you better and improving our website, increasing public awareness of our work, and maximizing our search engine optimization (SEO).</p>

Your data is collected from the information you provide directly to us (on our website, emails, etc) or from third parties. It is processed by The Better Governance Project staff and Board members.

## 2. How we use your data

We will only use your data in a manner that is appropriate considering the basis on which that data was collected, as set out in Table 1 at the top of this policy.

We may use your personal information to:

- reply to enquiries you send to us;
- refine the outputs and services we offer;
- handle donations or other transactions that you initiate;
- contact you for service administration purposes (for instance, if you have forgotten your password) or check that our records are correct;
- invite you to participate in or contribute to specific projects and studies being undertaken by The Better Governance Project;
- where you have specifically agreed to this, periodically send you news, updates and other marketing communications by email relating to our work which we think may be of interest to you;



- match your profiles with relevant positions and contact you regarding work or collaboration opportunities.

### **3. When we share your data**

We will only pass your data to third parties in the following circumstances:

- you have provided your explicit consent for us to pass data to a named third party;
- we are using a third party purely for the purposes of processing data on our behalf and we have in place a data processing agreement with that third party that fulfils our legal obligations in relation to the use of third-party data processors; or
- we are required by law to share your data a court, regulatory agency, subpoena, law, regulation, or other body of competent jurisdiction and authority

In addition, individual experts' personal data (see purpose 6 in Table 1) could be share with:

- Clients (as part of a grant process or contracted assignments),
- Partners (as part of a grant process or contracted assignments)
- Experts assisting with grants (as part of a grant process or for selection)
- Experts working in the field (for selection)
- Insurance companies
- Government agencies

With the exception of the circumstances for individual experts listed above, we will only pass data to third parties outside of the EU where appropriate safeguards are in place as defined by Article 46 of the General Data Protection Regulation.

### **4. How long we keep your data**

We take the principles of data minimisation and removal seriously and have internal policies in place to ensure that we only ever ask for the minimum amount of data for the associated purpose and delete that data promptly once it is no longer required.

### **5. Rights you have over your data**

You have a range of rights over your data, which include the following:

- Where data processing is based on consent, you may revoke this consent at any time and we will make it as easy as possible for you to do this (for example by putting 'unsubscribe' links at the bottom of all our marketing emails). If at any time you would like to stop receiving information or opt-out of a feature, you may also change your options by contacting [info@bettergovernance.se](mailto:info@bettergovernance.se)
- You have the right to ask for rectification and/or deletion of your information.
- You have the right of access to your information.
- You have the right to lodge a complaint with the Information Commissioner if you feel your rights have been infringed.

If you would like to access the rights listed above, or any other legal rights you have over your data under current legislation, please get in touch with us at [info@bettergovernance.se](mailto:info@bettergovernance.se).

Please note that relying on some of these rights, such as the right to deleting your data, will make it impossible for us to continue to deliver some services to you. However, where possible we will always try to allow the maximum access to your rights while continuing to deliver as many services to you as possible.

## 6. Cookies & usage tracking

A cookie is a small file of letters and numbers that is downloaded on to your computer when you visit a website. Cookies are used by many websites and can do a number of things, eg remembering your preferences, recording what you have put in your shopping basket, and counting the number of people looking at a website.

Where cookies are used to collect personal data, we list these purposes in section 1 above, along with other personal data that we collect. However, we also use some cookies that do not collect personal information but that do help us collect anonymous information about how people use our website. We use Google Analytics for this purpose. Google Analytics generates statistical and other information about website usage by means of cookies, which are stored on users' computers. The information collected by Google Analytics about usage of our website is not personally identifiable. The data is collected anonymously, stored by Google and used by us to create reports about website usage. Google's privacy policy is available at <http://www.google.com/privacypolicy.html>.

## 7. Modifications

We may modify this Privacy Policy from time to time and will publish the most current version on our website. If a modification meaningfully reduces your rights, we'll notify people whose personal data we hold and is affected.

