

## **PRIVACY POLICY of District 28 of Zonta International**

### **Introduction**

District 28 of Zonta International (hereafter "District 28") respects the user's confidentiality and undertakes to protect it as described in this privacy policy. The protection of personal data entrusted to us is of the utmost importance for District 28.

This Statement describes the types of data that may be collected by us or provided by users, when they visit <https://Zonta-district28.com> (hereinafter "Site"), or in other circumstances specified below, as well as our methods, purpose and scope of communication and dissemination of such data.

This Statement refers to the data collected by us:

- By e-mail, text messages and other electronic messages exchanged with the user.
- Through the Zonta clubs, areas and District 28.
- When registering for events organized by us.
- In publishing news from clubs, areas and districts about events, services, etc. which include names / images.
- In other types of interaction with Zonta District 28 - for example, in case of contacts for requests for information.

This Statement describes the methods and procedures for processing personal data (when it allows identification of the individuals to which they refer). This Statement may be changed periodically (see Changes to this Statement). It is therefore advisable to read it periodically.

### **Type of information collected and methods of collection**

We do not collect any data directly from users on our site.

From users (members of Zonta International and non-members) who communicate them to us in various ways as indicated above, we can collect different types of data, including:

- Data that could personally identify the user, such as name and surname, postal address, e-mail address or telephone number ("personal data");
- Data concerning the user without identifying him personally, such as age, gender, language preferences, skills, date of birth.

This information is collected:

- When the user provides it directly.
- From clubs, areas, District 28 and Zonta International.

### **Data provided by the user**

We collect the information you provide in your dealings with District 28, including:

- Information provided to request information from us, or at the time of membership as a member.
- Personal information requested to candidates of scholarships from Zonta International.
- Emails and other electronic messages, including posts on social media exchanged with users who contact us.
- Other features may be developed in the future that could lead to the collection of additional information.

The user can provide personal information to be published on the Site (hereinafter "posted") or transmitted to other users or third parties (hereafter referred to collectively as "user content"). In these cases, the user assumes the risk of publication and transmission to third parties. Although Zonta District 28 limits access to certain pages through login reserved to members, the absolute security of information cannot be guaranteed.

### **Details on use, IP addresses, cookies and other technologies**

We do not routinely collect information about the equipment, the browser and the user's usage habits. Although we do not automatically collect personal data, this information may be provided directly by you or by other sources to which you have connected. In this case, these data will be processed in compliance with the indications in this statement.

### **How we use the information collected**

The data acquired on the user, or that the user himself provides us, including any personal data, are used for:

- Provide information, upon user request (for example on officers in charge)
- Realize the goals of our core activities
- Comply with our obligations of Zonta District 28 towards our members
- Support Zonta International Foundation
- Facilitate planning the District Conference and special events
- Communicate of key messages of our organization

- Support for programs and membership of Zonta International
- Comply with all legal obligations
- All other purposes for which the user is informed when providing his data
- All other purposes for which the user gives us his consent.

Zonta District 28 confirms its commitment not to disclose the data of its members without prior authorization. The user who wishes to prevent his data from being used in the ways described above, may do so by contacting us. For further information see *User's choices regarding our methods of use and disclosure of information*.

### **Communication of information**

We may share personal information obtained directly by the user as described in this Statement:

- To enable us to carry out the activities for which the user has provided us with his data.
- For any other purpose the user will be informed when asked to provide such information.
- With the user's consent.

The personal information collected may also be disclosed:

- To respond to court orders, legal proceedings and other legal measures imposed by the competent authorities.
- If we believe that disclosure is necessary to protect the rights, property or safety of Zonta District 28, members of the Zonta clubs, the District and Zonta International.

This includes the exchange of information with other companies and organizations to protect us from fraud.

### **Donor Privacy Information**

Donations made to Zonta International do not pass through our Site, and related information is accessible to our Ambassadors only through reports sent directly from Zonta International Foundation (ZIF) to Ambassadors who have entered into a confidentiality agreement. In the ZIF forms for donations, it is possible to indicate that the donor intends to remain anonymous. In that case, the information about the donor will not even reach the Ambassadors.

Zonta International and Zonta International Foundation have established their privacy policy (see [www.zonta.org](http://www.zonta.org))

### **Data Processors Data Controller:**

Zonta International Governor District 28: Annemarie Loosli-Locher

Email Owner: [loosli-locher@sunrise.ch](mailto:loosli-locher@sunrise.ch)

Webmaster District 28: Kathrin Laubacher

Email webmaster: [contact@zontadistrict28.org](mailto:contact@zontadistrict28.org)

### **Access to personal data and changes:**

You can send an email to [webmaster@zonta-district28.com](mailto:webmaster@zonta-district28.com) to request access to your data, or to correct or delete data that you had provided previously. Change requests may be rejected, if they are considered to be in violation of the law. The contents on the user, even if removed by the owner, may still be viewable on the pages of the cache or archive, or may have been copied or archived by other users of the Site. For more information on the user or other content, see *Terms and conditions of use*.

However, for residents in the EU / EEA, this does not prejudice the rights that are mandatorily guaranteed by EU legislation (see the *EU Privacy Policy below*).

### **Children under the age of 16**

Zonta District 28 does not knowingly collect information relating to individuals under the age of 16. Should we notice that we have collected personal information relating to a minor under 16, in the absence of demonstrable parental consent we will delete them. Anyone who believes that we have collected information about a minor under 16, please contact us at [webmaster@zonta-district28.com](mailto:webmaster@zonta-district28.com).

### **Data Protection**

Zonta District 28 has taken appropriate measures to protect information from risks of loss and unauthorized access, use, alteration and disclosure. All information provided by users is stored on secure servers protected by firewalls and we use Secure Sockets Layer (SSL) to ensure that the transmission of sensitive data is encrypted and properly protected. Our Webmaster is informed about the importance of data protection, and we focus specifically on practices related to protection against unauthorized disclosure of personal data. We are ready to respond to incidents that violate Zonta District 28 security or privacy regulations.

The security of information also depends on the user. The password reserved to members of Zonta International in our District 28 to allow access to certain sections of our Site must be kept confidential by the user. Caution should be also exercised before releasing information to be published in sections of our Site that are open to the public, as they may be seen by anyone.

Unfortunately, the transmission of information via the Internet is not always completely secure. Although we do our best to protect your personal information, we cannot guarantee the absolute security of personal information transmitted to us. The user must therefore assume the risk of transmitting personal data. Zonta District 28 declines any responsibility for the possible circumvention of the data protection settings and other security measures set up on our Site.

## **Changes to this Statement**

Zonta District 28 may change, add, modify or remove sections of this Statement at any time. These changes will come into force immediately with their publication on our Site. The date of the last revision of the information is shown at the bottom of the page. It is up to the user to periodically consult this document to inquire about any updates. By continuing to visit our Site, you consent to changes to the information.

## **Contacts**

For questions or clarifications on the procedures adopted by Zonta District 28 to protect your privacy, or if you believe that Zonta District 28 has not acted in accordance with this Policy, you can contact us at [contact@zontadistrict28.org](mailto:contact@zontadistrict28.org)

Last update: June 2019

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## **Additional privacy policy for residents in the EU**

*The following additional information concerns residents of the European Union (EU) or the European Economic Area (EEA).*

### **1. Introduction**

1.1 – *when we collect personal data from residents in the EU or EEA, this is done in compliance with all EU applicable regulations on data protection and privacy. This includes, but is not limited to, the EU General Data Protection Regulation (2016/679) ('GDPR') and the national laws of EU member states that process or regulate the collection, processing and privacy of personal data (collectively "EU Data Protection Standards").*

1.2 - *This Privacy Statement for residents of the EU ("privacy notice for EU residents"), to be read together with the Zonta District 28 privacy policy, provides further information, as required by the EU Rules for the protection of data, about how we process or process personal data that we collect and about those with whom we may share them.*

1.3 - *This privacy statement also provides information on the rights recognized by law in accordance with EU data protection rules and how to exercise them.*

### **2. Methods of collecting personal data**

2.1 - *Given the global nature of our organization and its club network, Zonta District 28 can hold and process data collected from clubs, districts and partner organizations around the world within the EU / EEA.*

2.2. *This means, among other things, that the personal data of members residing in the EU / AEE (who have consented to this transfer) are transferred from the EU / AEE to the Zonta International headquarters in the United States, by the club to which these members belong. Zonta international has asked all Zonta clubs to confirm that each individual member has authorized collection and communication of personal data to Zonta International for the management of the membership, and requires confirmation at every renewal of the annual membership fee. None of this information passes through our Site.*

### **3. Direct marketing**

District 28 does not carry out direct marketing.

### **4. Foundations of lawfulness for data processing**

- 4.1. Personal data are processed by us in accordance with one or more of the following foundations of lawfulness recognized by the EU Data Protection Standards:
- (a) when the specific, informed and unambiguous consent to the processing of personal data by District 28 has been freely expressed for specific purposes;
  - (b) when District 28 shall provide services to the interested party (for example to register a member to district conferences);
  - (c) when it is necessary for us to process and use personal data in relation to our Zonta mission and to effectively manage our organization consistently in each territory. At all times, we will endeavor to pursue such legitimate interests in compliance with the legally recognized rights of those concerned, and in particular their right to privacy; and / or
  - (d) when it is necessary for us to comply with legal obligations, or in order to be able to certify, exercise or protect our rights in court.
- 4.2. It should also be noted that some of the personal data received and processed by us may include so-called "sensitive" data. This type of data is not part of those normally collected by District 28 or its clubs, but should this be the case, we will do it only in specific situations where:
- (a) the data were supplied to us giving explicit consent to their use;
  - (b) there is a legal obligation for us to process the data in accordance with the EU rules
  - (c) when it is necessary during legal actions to which we could be subject.

### **5. Disclosure of personal data to third parties**

We will treat personal data as confidential and will not disclose it to third parties without informing the interested parties. The exceptions concern legal proceedings and cases where there is a legal obligation for us to do so without informing the person concerned. In any case, it is our intent to ensure that personal data are used by the third parties with whom we work for lawful purposes and in compliance with the principles of EU data protection law.

### **6 Duration of the retention of personal data**

- 6.1. District 28 retains personal identification data for the time required in the specific circumstances (for example, as long as the person is affiliated with a club), in compliance with the duties imposed on us by the EU Data Protection Standards.
- 6.2. In accordance with the data retention regulations above, personal data that we no longer need will be deleted or converted into anonymous form, untraceable to the identity of the subjects.

### **7 Rights of users to their personal data**

- 7.1. In accordance with the rights recognized by the EU Data Protection Standards, users have the right to submit requests on their personal data held by us, on the use that we make of such personal data.
- 7.2. We will have up to one month to respond to such a request. However, we reserve the right to verify the identity of the applicant and, in particularly complex cases, to request two additional months to respond. We may also request a contribution for the administrative time of processing manifestly unreasonable or excessive requests. We may also request additional information to locate the specific information that is the subject of the request, and it is possible that certain legal exemptions established by the EU Data Protection Standards may be applied when replying to requests for access.
- 7.3. Residents in the EU / EEA also have the following rights, which are exercisable upon written request:
- (a) that we correct their inaccurate or incomplete personal data held by us;
  - (b) that we erase their personal data without undue delay where the need to detain or process them no longer exists;
  - (c) to object (where applicable) to automatic processing performed by us in relation to their personal data;
  - (d) to object to and / or restrict the use of personal data for purposes other than those set out above, except for legitimate compelling reasons.
- 7.5. Anyone wishing to exercise any of the above rights is invited to contact us at [contact@zontadistrict28.org](mailto:contact@zontadistrict28.org)