

ICMC Privacy Notice v1.0

Updated: 8 July 2019

This Privacy Notice relates to the International Catholic Migration Commission (herein after “ICMC”) and it explains how ICMC collects and processes personal data of visitors, job applicants, registered users or other users of the ICMC websites (herein after “users”, “Sites”). ICMC pays attention to legal restrictions, contractual undertakings and ethics prior to deciding to collect and process the users’ personal data. This Privacy Notice explains when and how personal data is collected and processed and the rights which the users have over their own information.

This Privacy Notice also covers all the activities of the ICMC’s Policy Department, including the work of the Civil Society Action Committee and everything that is related to the GFMD Civil Society Days. This include all their specific websites (www.madenetwork.org, www.csengagement.org, www.gfmdcivilsociety.org) and other platforms and covers all personal data that can be collected for communication purposes (such as newsletters, webinars or other information sharing tools) or events (GFMD Civil Society Days or others).

Please note that if you disagree with anything in this Privacy Notice, you must not use the Sites or mobile applications, or provide personal information to us in connection with ICMC’s products or services.

1. Data Protection Contacts

ICMC is headquartered in Geneva, Switzerland. You may contact ICMC’s internal data protection resource if you have any questions or concerns about ICMC’s policies or practices regarding Personal Data.

EU Representative :

Tanja Zwack, ICMC Greece

44; Zalokosta Str. & Kifissias Avenue, 15233 Chalandri, Athens, Greece

+ 30 211 1069 361

[E-Mail:privacy@icmc.net](mailto:privacy@icmc.net)

ICMC Contact:

MATEI Mihaela

E-Mail: privacy@icmc.net

ICMC

1,rue de Varembé

1202 Geneva, Switzerland

2. Collection of Personal Information

A. Information You Directly and Voluntarily Provide to Us.

Membership: ICMC membership is composed of a worldwide network of Catholic Bishops' Conferences. Membership in ICMC does not depend on a subscription or registration, but rather on the mandate given to the organization by its founder, Pope Pius XII. Its organizational structure is built on the principle that Bishops' Conferences nominate a focal person or Catholic organization to serve as representative to ICMC. ICMC national members and their delegated representatives are automatically registered on Mailchimp, where their personal data is stored and used for communication purposes.

Events and Conferences: ICMC may host events that include in-person and virtual conferences, training, knowledge sharing and webinars. If you register for an ICMC event we will access the information in your member account to provide you with information and services associated with the event. If you register for one of our events, we will collect your first and last name, email address, business or home address, which we will use to provide you with information and services associated with the event.

Publications: We offer various publications and materials through our Sites. Some of these publications and materials are publicly accessible, or that you create an account and subscribe to receive these publications and materials. If you are not an ICMC member and you create an account for this purpose, you will be required to provide certain information as part of your account registration, including your first and last name, email address, and business or home address and professional information. Demographic data might be collected anonymously for statistics purposes and donor reports. You may manage your ICMC subscriptions by subscribing or unsubscribing at any time. If you have any difficulties managing your subscription or other preferences, email us at privacy@icmc.net

Job Applications, Tests and Trainings: When you apply for an ICMC job position, we will collect your first and last name, email address, phone number, business address, home address, demographic information and professional and education history. We may also collect and store information you provide to us about special accommodations that you may request. Only authorized employees within ICMC have access to your test scores and personal information. ICMC will collect your test results and your record of participation in continuing professional education.

Communications with ICMC: If you communicate or correspond with us by email, through postal mail, via phone or through other forms of communication, we may collect the information you provide as part of those communications. For example, if you correspond with us through email, we may collect and store the email address you use to send the applicable correspondence and use it to respond to your inquiry; to notify you of ICMC conferences, publications, or other services; or to keep a record of your inquiry.

B. Information We Automatically Collect from You.

What is "personal data": Any information that can be directly or indirectly linked to a living, natural person is considered personal data (such as a name, an identification number, location data, an online identifier or one or more factors specific to the physical, physiological, genetic, mental, economic,

cultural or social identity of that natural person). The information does not necessarily have to consist of text or numbers; rather, it can also consist of photos, videos, images or audio recordings that can be associated with a person. The terms “personally identifiable information”, “personal data”, “private information”, “sensitive Personal Information”, “special categories of data” and “legally protected information” are often used interchangeably to refer to information relating to an individual’s personal data. For the purposes of this Privacy Notice, the all-inclusive terms “Personal Information” or “Personal Data” shall be used where appropriate.

We may automatically collect information about you when you use the Sites or our services. For example, if you access the Sites through a computer, we will automatically collect information such as your browser type and version, computer and connection information, IP address and standard web log information. If you access the Sites through a mobile device, we may also be able to identify the location of your mobile device. You may choose not to share your location details with us by adjusting your mobile device’s location services settings. For instructions on changing the relevant settings, please contact your service provider or device manufacturer. This information that we automatically collect from you is used to enhance the performance of ICMC’s website. ICMC also uses your location information (if shared with ICMC) to identify the geographic locations from which our content is accessed so that we can better understand what content topics may be most relevant in that region, and to ICMC members generally, and to develop resources around those content topics.

We may automatically collect information from you when you use the Sites using “cookies” and other similar technologies, such as web beacons. Cookies are small amounts of data that are stored within your computer’s Internet browser and that are accessed and recorded by the websites that you visit so that they can recognize the same browser navigating online at a later time. The cookies are not able to execute code or access other information stored on the computer. Web beacons are transparent pixel images that are used in collecting information about website usage, email response and tracking.

Information that may be collected by cookies when you use the Sites may include, without limitation:

- the pages you visit within the Sites;
- the date and time of your visit to the Sites;
- the amount of time you spend using the Sites;
- the Internet Protocol (IP) address used to connect your computer to the Internet; and/or
- your computer and connection information such as your browser type and version, operating system and platform.

This information is collected to enhance the site performance and end user experience. You can set your browser to reject cookies or to notify you when you are sent a cookie. To learn more about your ability to manage cookies and web beacons, please consult the privacy features in your browser. In addition, to find out more about cookies, including how to see what cookies have been set on your device and how to manage and delete them, visit www.allaboutcookies.org

ICMC will not associate identifiers from cookies or similar technologies with sensitive identifiers about you, such as race, religion, age, sexual orientation or health.

C. Information Collected by Third Parties through Third-Party Links and Content.

The Sites may include links to other websites and other content from third-party organizations and can offer direct interaction with external websites, networks or platforms that are outside ICMC’s control.

These third-party businesses may use cookies, web beacons or other similar technology to collect information about you. ICMC does not have access to or control over these third parties or the cookies, web beacons or other technology that these third parties may use. We are not responsible for the security, privacy of the information collected by these third parties or the privacy practices of these third parties or the content on any third-party website. You are encouraged to review the privacy policies of the different websites you visit and of the advertisers whose ads you may choose to click while on our Sites.

D. Information Collected by Third-Party Analytics Services.

We may work with third-party analytics services to help us understand how the Sites are being used, such as tracking the frequency and duration of use of the Sites. We may use Adobe Analytics and Google Analytics, and web analytics services provided by Adobe and Google (“Analytics Tools”) to collect information about your use of the Sites. These Analytics Tools may use cookies to collect information about the content you view, what websites you visit immediately prior to and after visiting the Sites, and your system information and geographic information. The information generated by these cookies about your use of the Sites will be transmitted to and stored by the applicable analytics services. The information collected by these analytics services allows us to analyze your use of the Sites. The Analytics Tools may also transfer this information to third parties where required to do so by law, or where such third parties process the information on their behalf. You may refuse the use of cookies by selecting the appropriate settings on your browser, however, please note that if you do this you may not be able to use the full functionality of the Sites. From the moment you cancel your ICMC membership or withdraw your consent for the processing of personal information, ICMC will not be able to access the personal information processed by third-party analytics. By using the Sites, you consent to the processing of data about you by Adobe and Google in the manner and for the purposes set out above. You can opt-out of Google Analytics by installing Google’s opt-out browser add-on, and out of interest-based Google ads using Google’s Ads Settings.

E. Information You Share on Third-Party Websites or through Social Media Services.

The Sites may include links to third-party websites and social media services where you will be able to post comments, stories, reviews or other information outside of ICMC’s control. Your use of these third-party websites and social media services may result in the collection or sharing of information about you by these third-party websites and social media services. ICMC is not responsible for the security or privacy of any information collected by other websites or other services. Information collected by third parties is governed by their privacy practices. We encourage you to review the privacy policies and settings on the third-party websites and social media services with which you interact to make sure you understand the information that may be collected, used, and shared by those third-party websites and social media services.

F. Information You Post on the Sites.

If you post information on public areas of the Sites, that information may be collected and used by ICMC, other users of the Sites, and the public generally. ICMC may share the following personal data with Donors (UNHCR, EU, Governments, etc.) for this roster management platform and other ICMC platforms: your name, state, postal code, country, phone number, bio, email, job title, company, certifications, education (university or school and degree), areas of interest, membership level, memberships, work experience, date of birth, photo and staff membership.

If you decide to participate in our platforms and professional networking features, keep in mind that your personal information (for example, your name and online user name), along with any substantive information you disclose in the communication you decide to post, will be publicly accessible and viewable by others who visit that area (e.g. LinkedIn). In addition, we may highlight certain users' postings or contributions to other members of the ICMC professional networking features. For example, users who participate actively in our social networking features, like contributing materials and engaging in certain online activities, will be listed as "active members" in a roster that is viewable by all other registered users. It is possible that your posting may result in unsolicited messages from third parties. We strongly recommend that you do not post any information on the public areas of the Sites that allows strangers to identify or locate you or that you otherwise do not want to share with the public.

G. Information You Provide to Donor Payment Processors.

All payments made to ICMC Inc. are processed by a PCI/DSS-compliant (these are payment card industry security standards) payment processing service engaged by ICMC. All information collected by these third-party providers for purposes of processing your payments is not available to us, unless you have otherwise provided this information to us in connection with your use of the Sites or our products and services.

H. Personal Information Provided by Third Parties.

We may receive personal information about individuals from third parties. This may happen if your employer pays and registers you for training, certification, or membership, however, we will only share information about you with your employer if you consent in advance to our sharing this information. Our third-party training partners may also share your personal information with ICMC when you sign up for jobs, training, or membership.

3. Online Advertising; Tracking (e.g. Facebook, Twitter, LinkedIn, Instagram, etc.)

ICMC and third-party businesses may use the information collected through the Sites using cookies, web beacons, and other similar technologies to help manage online advertising programs. This information may enable ICMC and our third-party advertising services and other third-party businesses to track the actions of users online over time and across different websites or platforms to measure statistics relating to marketing efforts, and to deliver electronic advertisements that may be more relevant to individual consumers and that will improve the consumer experience. For information about how tracking works for online advertising purposes, and what happens when you elect a do-not-track option, visit <http://www.aboutads.info/choices>. In addition, some third-party businesses may provide a mechanism to opt-out of their technology. For more information about the opt-out process, you may visit the Network Advertising Initiative website, available at: http://www.networkadvertising.org/managing/opt_out.asp

Do Not Track: Your browser may allow you to adjust your browser settings so that "do not track" requests are sent to the websites that you visit. However, ICMC does not respond to "Do Not Track" (DNT) signals. To determine whether any of the third-party services it uses honor the "Do Not Track" requests, please read their privacy policies.

4. Use, Sharing and Retention of Personal Information

A. How We Use Your Information.

ICMC uses personal information for the purposes described at the time of collection, including registering you for event or regular meetings programs, or registering you for reduced hotel price rates, and to otherwise process your requests or address your inquiries. ICMC also publishes the names, titles, country and affiliations of episcopal conferences, committee members and others who have assisted with initiatives or projects to provide recognition of their achievements to the ICMC community. ICMC also uses your information, as permitted by law, for recruitments processes and to provide you with information about ICMC events in which we believe you may be interested. If you are a member, we may email you about events that we believe may be of interest to you. If you wish to opt-out of receiving these emails from us, please follow the instructions contained in an applicable email you receive from us, which will allow you to opt-out of receiving these types of email communications from us. We may also use your personal information to tailor your experience at our Sites, to compile and display content and information that we think you might be interested in, and to provide you with content according to these preferences.

B. How We Share Your Information with Third Parties.

Except as set forth in this Privacy Notice or when specifically agreed to by you, we will not disclose personal information we gather from you to third parties unless ICMC is required to share this information to complete your request or for legitimate business purposes. ICMC shares personal information in the following circumstances:

Third-Party Service Providers. We may share your information with vendors or third parties who deliver or provide goods and services or otherwise act on behalf of or at the direction of ICMC. These third parties may include, for example, our third-party technology providers, including our mobile application vendor, exam-testing agencies and training providers and partners, product-fulfillment companies, and third-party event hosts, hotels for conference registrants, sponsors, co-sponsors and exhibitors. These third-party service providers will only have access to the information needed to perform these limited functions on our behalf. If you do not wish to have your information included in an attendee list or to receive information from sponsors, co-sponsors and/or exhibitors, you can express your preferences when you register for events or you may contact ICMC directly atprivacy@icmc.net

Volunteers and Board Members. We may share your information with our affiliates, subsidiaries and ICMC volunteers and board members for purposes of conducting ICMC's internal operations. ICMC also makes publicly available the names, titles, country and business affiliations of episcopal conferences, committee members and others who have assisted with initiatives or projects.

Other ICMC Organizations. We may share your information with our Field Offices but only with your consent and for the specific purpose, meeting, etc., specified on that occasion.

ICMC Events. If you are an event attendee, speaker, or sponsor, certain items of your personal data might be collected through the specific conference application. ICMC provides conference attendee information to BlueJeans (First Name, Last Name, Company Name, Country, Email address (not publicly visible unless the user chooses to make it publicly visible to other app users), Session

selections (Conference specific)) during conference registration. Any collected data is deleted by the third party after the event takes place. Further, by registering and attending an ICMC event, you agree irrevocably, with no compensation to you, that ICMC or any third party who is acting on ICMC's behalf may create images, videos and/or sound recordings of you ("works") at the event for communication purposes. This grant of rights in the works also includes the rights to adapt, reproduce, distribute, perform, make available to the public, broadcast, retransmit or sublicense the works to ICMC's affiliates. This grant of rights in the works also includes all current and future media and is not restricted to time or territory.

Job Applicants. If you use our Roster portal or the Vacancy Page, the information you include in your profile will be shared with our Donor and will be subject to the Donor's privacy policies. When you provide this information may be accessible to potential employers or recruiters. ICMC will only share information about you with potential employers or recruiters if you consent in advance to our sharing of this information.

Response to Court Orders, Government Requests or to Protect Rights and to Comply with Our Policies. To the extent permitted by law, we will disclose your information to government authorities or third parties if: (a) required to do so by law or regulation, or in response to a court order or any other enforceable governmental request or order; (b) we believe in our sole discretion that disclosure is reasonably necessary to protect against fraud, to protect the property or other rights of us or other users, third parties or the public at large; or (c) we believe that you have abused the Sites by using them to attack other systems or to gain unauthorized access to any other system, to engage in spamming or otherwise to violate applicable laws. You should be aware that, following disclosure to any third party, your information may be accessible by others to the extent permitted or required by applicable law.

Organizational Transfers, Bankruptcy. In the event of a merger, acquisition, bankruptcy or other sale of all or a portion of our assets, any user information owned or controlled by us may be one of the assets transferred to third parties. Unless you are residing in the European Economic Area, we reserve the right, as part of this type of transaction, to transfer or assign your information and other information we have collected from users to third parties. ICMC will still ensure the confidentiality and security of any user information. Other than to the extent ordered by a bankruptcy or other court, the use and disclosure of all transferred user information will be subject to this Privacy Notice.

Aggregate Information. We may share your information with affiliated or unaffiliated third parties on an anonymous, aggregate basis. While this information will not identify you personally, in some instances these third parties may be able to combine this aggregate information with other data they have about you, or that they receive from third parties, in a manner that allows them to identify you personally.

Where we do share your personal data with third parties, ICMC takes steps to ensure that they use appropriate safeguards to protect your personal data.

C. Information for Individuals Located in the European Union.

Legal Basis for The Processing of Personal Information from EEA Residents

If you reside within the European Economic Area (EEA), our processing of your personal information

will be legitimized as follows:

(i) Whenever we require your consent for the processing of your personal information such processing will be justified pursuant to Article 6(1) lit. (a) of the General Data Protection Regulation (EU) 2016/679 (“GDPR”). This article in the GDPR describes when processing can be done lawfully.

(ii) If the processing of your personal data is necessary for the performance of a contract between you and ICMC or for taking any pre-contractual steps upon your request, such processing will be based on GDPR Article 6(1) lit. (b).”). If this data is not processed, ICMC will not be able to execute the contract with you.

(iii) Where the processing is necessary for us to comply with a legal obligation, we will process your information on basis of GDPR Article 6(1) lit. (c), for example complying in the fields of employment law.

(iv) And where the processing is necessary for the purposes of ICMC’s legitimate interests, such processing will be made in accordance with GDPR Article 6(1) lit. (f), for example to detect fraud.

Transferring Personal Data from the EU to the US:

ICMC has its headquarters in Geneva, Switzerland. ICMC Inc. has its headquarters in the United States. Information we collect from you in US will be processed in the United States. The United States has not sought nor received a finding of “adequacy” from the European Union under Article 45 of the GDPR). A finding of “adequacy” in short means that the European Commission has decided that this country outside the EEA ensures an adequate level of data protection. ICMC relies on derogations as set forth in Article 49 of the GDPR as the United States has no “adequacy” decision and no other safeguards under the GDPR are in place (for example binding corporate rules on the transfer outside the EEA). In particular, ICMC collects and transfers to the U.S. personal data only: with your explicit consent; to perform a contract with you; in a manner that does not outweigh your rights and freedoms. If this data is not processed and transferred, ICMC will not be able to execute the contract with you or you will not have access to any or all of the benefits and features associated with your transaction. ICMC endeavors to apply suitable safeguards to protect the privacy and security of your personal data and to use it only consistent with your relationship with ICMC and the practices described in this Privacy Notice. ICMC also minimizes the risk to your rights and freedoms by not collecting or storing sensitive information about you.

If you wish to confirm that ICMC is processing your personal data, or to have access to the personal data ICMC may have about you, please contact us at privacy@icmc.net

European Union Data Subject Rights

The European Union’s General Data Protection Regulation and other countries’ privacy laws provide certain rights for data subjects (these are persons that can be identified).

This Privacy Notice is intended to provide you with information about what personal data ICMC collects about you and how it is used.

If you wish to confirm that ICMC is processing your personal data, or to have access to the personal

data ICMC may have about you, or have other questions, please contact us at privacy@icmc.net

You may also request information at privacy@icmc.net about the purpose of the processing; the categories of personal data concerned; who else outside ICMC might have received the data from ICMC; what the source of the information was (if you did not provide it directly to ICMC); where the personal data is stored and how long it will be stored. You have a right to correct (rectify) the record of your personal data maintained by ICMC if it is inaccurate. You may request that ICMC erase that data or cease processing it, subject to certain exceptions. You may also ask ICMC for your personal data to be supplemented or updated, or for their transformation into anonymous format or to block any data held in violation of the law, as well as to oppose their treatment for any and all legitimate reasons. You may withdraw your consent for the processing of personal data or the further processing of personal data by ICMC at any time. You may also request that ICMC cease using your data for direct marketing purposes. In many countries (including EEA countries), you have a right to lodge a complaint with the appropriate data protection authority if you have concerns about how ICMC processes your personal data. When technically feasible, ICMC will—at your request—provide your personal data to you or transmit it directly to another controller. You have the right to receive your personal information in a structured and standard format.

In addition to the information contained in this Privacy Notice, you may be provided with additional and contextual information concerning particular services or the collection and processing of your personal data upon request.

Reasonable access to your personal data will be provided at no cost to ICMC members, conference attendees and others upon request made to ICMC at privacy@icmc.net. If access cannot be provided within a reasonable time frame, ICMC will provide you with a date when the information will be provided. If for some reason access is denied, ICMC will provide an explanation as to why access has been denied.

D. Security of Your Information.

ICMC uses reasonable physical, technical and administrative measures to safeguard personal information you provide through the Sites or in connection with ICMC's products and services. Please be aware that no data transmission over the Internet can be guaranteed to be 100% secure. As a result, ICMC cannot guarantee or warrant the security of any information you transmit on or through the Sites and you do so at your own risk.

E. Data Storage and Retention.

Your personal data is stored by ICMC on its servers, and on the servers of the database management services ICMC engages, located on Microsoft Servers (in Sweden, Ireland, France, Netherlands, Switzerland). ICMC retains data for the duration of the data subject's or member's relationship with ICMC and otherwise as required under applicable law. Personal data will be kept for no longer than is necessary for the purposes for which your personal data are processed. We will retain your personal data as long as you are an ICMC member or require our services so that we can provide these services to you.

If you are located in the European Economic Area, at the moment you cancel your ICMC membership / newsletter subscription or withdraw your consent for the processing of your personal information, all

your personal data received and stored are erased if no longer needed by us. Unless we are required to retain this personal data by law or to comply with our regulatory obligations. In such a case, we will only keep this personal data for as long as necessary. For more information on where and how long your personal data is stored, and for more information on your rights of erasure and portability, please contact our data privacy resource at privacy@icmc.net

5. Special Information for California Residents.

If you want to opt-out of ICMC sharing your information with third parties for their own marketing purposes, you can opt out by contacting privacy@icmc.net

Upon receipt, verification and confirmation of your request, ICMC will process your opt-out and you will receive an email confirming that you have opted-out and that ICMC stopped using/collecting your personal data as well as deleted it, if the data is no longer required by law.

Section 1798.83 of the California Civil Code requires select businesses to disclose policies relating to the sharing of certain categories of your information with third parties. If you reside in California and have provided your information to ICMC, you may request information about our disclosures of certain categories of information to third parties for direct marketing purposes. Such requests must be submitted to us at privacy@icmc.net

6. How to Contact ICMC and Modify Your Information or Preferences.

Questions regarding this Privacy Notice should be directed to ICMC's data privacy privacy@icmc.net. If you would like to modify the types of communication messages you receive from ICMC, you may do so by following the instructions within the body of any email message that you receive from us.

To help us keep your personal information up to date, or to request access to the personal information ICMC maintains about you, you may contact us at privacy@icmc.net at 1 rue de Varembe, 1202 Geneva, Switzerland. Or, if you are a registered user of one of our Sites, you may go online to your personal profile and update your information in that area.

7. Children.

ICMC is a nonprofit international organization and the Sites are not directed to children under the age of 13. ICMC does not knowingly collect personally identifiable data from persons under the age of 13 of COPPA (The Children's Online Privacy Protection Act). If you are a parent of a child under 13, and you believe that your child has provided us with information about him or herself, please contact us at privacy@icmc.net

8. Modifications to this Privacy Notice.

From time to time, ICMC may need to update or modify this Privacy Notice, to reflect changes in our organization practices, data collection practices or organization. We reserve the right to amend this Privacy Notice at any time, for any reason, without notice to you, other than the posting of the amended Privacy Notice on the Sites, or, if you have provided your email address to us, sending you an email notifying you of the amended Privacy Notice. It is strongly recommended to check the Site

often, referring to the date of the last modification listed at the top. We will in any case not reduce your rights under this Privacy Notice without your explicit and informed consent. If you do not agree to the changes, you should discontinue your use of the Sites, and cease providing personal information to us, prior to the time the modified Privacy Notice takes effect. If you continue using the Sites or provide personal information after the modified Privacy Notice takes effect, you will be bound by the modified Privacy Notice.

9. Questions, Concerns or Complaints

If you have any questions or concerns about this Privacy Notice, please contact ICMC's data protection resource at privacy@icmc.net

ICMC constantly updates its privacy notice, to access the revised notice and terms, please visit <https://www.icmc.net/terms-and-conditions>. By continuing to use the site, you agree to the revised terms.

By pressing Accept, I understand and agree that the information I have provided will be used as described in the ICMC Privacy Policy.

By pressing Accept, I further agree to the website Terms, and confirm that the information I have provided is my own.

Upon receipt, verification and confirmation of your request, ICMC will process your opt-out and you will receive an email confirming that you have opted-out and that ICMC stopped using/collecting your personal data as well as deleted it, if the data is no longer required by law.

Section 1798.83 of the California Civil Code requires select businesses to disclose policies relating to the sharing of certain categories of your information with third parties. If you reside in California and have provided your information to ICMC, you may request information about our disclosures of certain categories of information to third parties for direct marketing purposes. Such requests must be submitted to us at privacy@icmc.net