



**JESUIT WORLDWIDE LEARNING**  
HIGHER EDUCATION AT THE MARGINS

**Your Privacy**

May 25, 2018

Jesuit Worldwide Learning – Higher Education at the Margins (JWL) is a registered non-government Association in Geneva, Switzerland (registration CHE 334 930 559 and registered in the United States of America as a 501 c(3) non-profit entity organized in the State of Washington 46-2795989. JWL is committed to protecting your privacy.

We endeavour to at all times respect any personal information you share with us, or that we receive from other organisations, and keep it safe. This Privacy Policy (henceforth referred to as ‘Policy’) sets out our data processing practices and your rights and options regarding the ways in which your personal information is collected (through our website – [www.jwl.org](http://www.jwl.org)) and used.

This Policy contains important information about your personal rights to privacy. Please read it carefully to understand how we use your personal information.

The provision of your personal information to us is voluntary. However, without providing us with your personal information, your use of our services or your interaction with us may be impaired. For example, you will be unable to make a donation or receive our newsletter.

**Policy Content Index**

1. How is your personal data protected?
2. When do we collect personal information about you?
3. What personal information do we use?
4. How and why will we use your personal information?
5. Lawful bases
6. Communications for marketing/ fundraising
7. Donations
8. How long do we keep your personal information?
9. Will we share your personal information?
10. Security/ storage of and access to your personal information
11. International data transfers
12. Exercising your rights
13. Changes to this Policy
14. Links and third parties
15. How to contact us

**1. How is your personal data protected?**

Your personal data is protected by specific legislation, including:

- The Privacy and Electronic Communications (EC Directive) Regulations 2003, as amended by The Privacy and Electronic Communications (EC Directive) (Amendment) Regulations 2011
- Directive 2009/136/EC of 25 November 2009 (“The European Union Cookie Directive”).
- General Data Protection Regulation (EU) 2016/679.

## 2. When do we collect personal information about you?

- **When you give it to us directly**

For example, personal information that you submit through our website by making a donation, signing up for our e-mail newsletter or filling in a form to register your interest in our activities (volunteering, becoming a professor, a tutor, a donor), or personal information that you give to us when you communicate with us by email, phone, letter, through our website and social media sites.

- **When it is available publicly**

Your personal information may be available to us from external publicly available sources. For example, depending on your privacy settings for social media services, we may access information from those accounts or services (for example when you choose to interact with us through platforms such as Facebook, You-Tube, Instagram or Twitter).

### **When you visit our website**

We do not collect any personal information when you browse our website. We only collect personal information if you choose to do so by subscribing to our newsletter, communicate an interest in becoming a professor and tutor via the online application process or volunteer by emailing [jwlinfo@jwl.org](mailto:jwlinfo@jwl.org), and wish to donate). In general, we may combine your personal information from these different sources for the purposes set out in this Policy.

### **JWL Newsletter**

Via our website you can also register for our Newsletter. In this case, you will have to consent to the following:

You are giving your consent to processing your email address for the purpose of sending a Newsletter with information about JWL. We will not transfer the email address we have received for newsletters to any third party, except for the purpose of sending out the newsletter, where we may work with a specialised provider contracted by us:

Mailchimp: <https://mailchimp.com/legal/privacy/>, The Rocket Science Group LLC d/b/a MailChimp, 675 Ponce de Leon Ave NE, Suite 5000 Atlanta, GA 30308 USA. You can, of course, unsubscribe from the newsletter at any time via email [jwlinfo@jwl.org](mailto:jwlinfo@jwl.org), or better by following the instructions provided at the bottom of each newsletter. After unsubscribing, your email address will be removed from the system handling the newsletter.

### **Social Plugins**

- Facebook Like Button: [https://de-de.facebook.com/full\\_data\\_use\\_policy](https://de-de.facebook.com/full_data_use_policy) by Facebook Inc., 1601 S. California Avenue, Palo Alto, CA 94304, USA; Facebook, 4 Grand Canal Square, Dublin 2, Ireland
- Twitter Tweets: <http://twitter.com/privacy> by Twitter Inc., 1355 Market St, Suite 900, San Francisco, CA 94103, USA; Twitter, 1 Cumberland Place, Dublin 2, Ireland
- Instagram integration, <https://help.instagram.com/155833707900388>, by Instagram LLC, 1601 Willow Rd, Menlo Park CA 94025, USA
- LinkedIn Share Button, <https://www.linkedin.com/legal/privacy-policy> by LinkedIn Ireland Unlimited Company, Wilton Plaza, Wilton Place, Dublin 2, Ireland
- YouTube: <https://support.google.com/youtube/answer/2801895?hl=en>, YouTube LLC, 901 Cheery Ave., San Bruno, CA 94066, USA

Most of those services will not be contacted unless you specifically click on the respective buttons, but they may also establish a direct connection, which will allow the services to combine the information that you are accessing our service with your account information, if you are logged in to the respective service. Upon clicking the respective logo, the information will then be made publicly available, according to the specific policies of the service as well as your preferences within that service.

### **Becoming a JWL Professor or Tutor**

Should you be interested in applying and registering to become a JWL Professor or Tutor, you will have to agree to the following data application processing. In order to register as a JWL Professor or Tutor, you must successfully apply first.

The application process meets two more goals:

- To ensure that you are eligible to become a Professor or Tutor.
- To ensure that you meet our eligibility criteria as a JWL Professor or Tutor, according to your qualifications and motivation.

The following pieces of data are collected and used to create your JWL Professor or Tutor account as an applicant:

- first name
- last name
- email
- gender
- country
- city
- date of birth
- phone number
- languages
- country you went to school
- your education level
- your previous educational degrees
- resume
- whether you previously attended university or not
- Your current position
- Your current employer and employer location
- Previous experience and skills

The respective documents uploaded or emailed to us by you are stored separately from your account information.

When your application is successful you may be provided an email account with an address having two letters, representing the first initial of your first and last names, and a number. This account will be maintained by Google Inc., and administered by us as part of their Google-for-Nonprofits programme.

The data is transferred to Google Inc., under an agreement, which includes the standard-clauses predefined by the European Commission, as a possible legal basis for such transferal.

To use our service you will need to agree to Google's terms of service (<https://www.google.com/intl/en/policies/terms/>) and privacy policy (<https://www.google.com/policies/privacy/>).

Effectively, the account entails a number of functions, which are part of the G Suite. A core functionality, besides Email, is the use of the login-mechanism, i.e. you will need to login via this account, when wanting to access our services.

**For further information see:**

<https://apps.google.com/faq/security/>

<https://cloud.google.com/security/whitepaper>

**Services**

As a JWL Professor or Tutor you are given access to a number of services and functionalities of the platform, for which personal data needs to be collected. Specifically:

- to provide recommendations for supporting which online courses
- to provide further information about our recent developments at JWL
- to deliver a possibility for exchange through our online learning forum

JWL may collect, process and use the content and other information users provide when using the services, including the data submitted for signing up for a service, creating or sharing content, and messaging or communicating with others on the website. Such information may include:

- first name
- last name
- email
- gender
- country
- city
- date of birth
- phone number
- etc.

Additional Information via phone, email and other means. JWL may send you updated information via email or other messaging services for which the respective contact details are used.

**These services include:**

- WhatsApp: for certain services we may also ask you to communicate through WhatsApp Messenger service ( <https://www.whatsapp.com/legal/#privacy-policy>)
- Google Hangouts: may be used for phone conversations with students and video calls within JWL -organized group tutorial sessions (<https://www.google.com/+/policy/call-phones-terms.html>)
- Facebook Groups: May be used for recruiting purposes and for the organisation of student events. ([https://www.facebook.com/legal/FB\\_Work\\_Privacy](https://www.facebook.com/legal/FB_Work_Privacy))

Such messages may include information about our organization and recent developments. We may also contact you in case of questions in connection with the JWL platform, as well as to inform you on changes with regard to this Data Privacy Policy or any other Terms of Services.

## **Other disclosures**

Other than in the aforementioned cases JWL will not transmit your personal data to any third parties, unless we are obliged to do so because of legal regulations (e.g. disclosure to courts or law enforcement authorities), you have given us your explicit consent, or the disclosure is permitted by law. A disclosure may for example be permitted when such disclosure is required for us to be able to render our services to the user on the JWL platform.

## **3. What personal information do we use?**

### **We may collect, store and otherwise process the following kinds of personal information:**

- your name and contact details including postal address, telephone number, email address and, where applicable, social media identity;
- your financial information, such as bank details and/ or credit/ debit card details, account holder name, sort code and account number;
- personal descriptions and photographs;
- details of your qualifications/ experience;
- any other personal information which you choose to share with us as per clause 1.

### **Do we process special categories of data?**

The EU General Data Protection Regulation (GDPR) recognizes certain categories of personal information as sensitive and therefore requiring more protection, for example information about your health, ethnicity and political opinions.

In certain situations, the JWL may collect and/or use these special categories of data. We will only process these special categories of data if there is a valid reason for doing so and where the GDPR allows us to do so.'

## **4. How and why will we use your personal information?**

Your personal information, however provided to us, will be used for the purposes specified in this Policy. In particular, we may use your personal information:

- to provide you with information you have requested;
- to provide services to our beneficiaries (students);
- to provide further information about our work, services or activities (where necessary, and only where you have provided your consent to receive such information);
- to process your donations;
- to answer your questions/ requests and communicate with you in general;
- to manage relationships with our supporters and beneficiaries;
- to further our charitable aims in general, including for fundraising activities;
- to analyse and improve our work, services, activities or information (including our website), or for our internal records;
- to report on the impact and effectiveness of our work;
- to run/ administer our website, keep them safe and secure and ensure that content is presented in the most effective manner for you and for your device;
- to register, administer and personalise online accounts;
- to register and administer your participation in events;
- to process your application for a job or volunteer role with us when you apply through our Becoming a professor, Becoming a tutor or Get involved pages;
- to administer your employment/contracting relationship with us (example, pay your salary);

- to audit and/ or administer our accounts;
- to satisfy legal obligations which are binding on us, for example in relation to regulatory, government and/ or law enforcement bodies with whom we may work (for example requirements relating to the payment of tax or anti-money laundering);
- for the prevention of fraud or misuse of services; and/or
- for the establishment, defense and/ or enforcement of legal claims.

## 5. Lawful bases

The GDPR requires us to rely on one or more lawful bases to use your personal information. We consider the grounds listed below to be relevant:

- Where you have provided your **consent** for us to use your personal information in a certain way (for example, you have subscribed to receive our newsletter or e-mailed us asking for further information about our programmes).
- Where necessary so that we can **comply with a legal obligation** to which we are subject (for example, where we are obliged to share your personal information with regulatory bodies which govern our work and services).
- Where **necessary for the performance of a contract** to which you are a party or to take steps at your request prior to entering a contract (for example, if you apply to work for/ volunteer with us).
- Where there is a **legitimate interest** in us doing so.

The GDPR allows us to collect and process your personal information if it is reasonably necessary to achieve our or others' legitimate interests (as long as that processing is fair, balanced and does not unduly impact your rights).

In broad terms, our "legitimate interests" means the interests of running JWL as a charitable entity and pursuing our aims and ideals; for example providing information about current humanitarian crises, processing donations, administering events and taking applications for volunteers.

When we process your personal information to achieve such legitimate interests, we consider and balance any potential impact on you (both positive and negative), and your rights under data protection laws. We will not use your personal information for activities where our interests are overridden by the impact on you, for example where use would be excessively intrusive (unless, for instance, we are otherwise required or permitted to by law).

## 6. Communications for marketing/ fundraising

We may use your contact details to provide you with information about our work, events, services and/ or products which we consider may be of interest to you (for example, about services you previously used, or updates about fundraising appeals and/or volunteering opportunities via our newsletter).

Where we do this via email or telephone, we will not do so without your prior consent (unless allowed to do so via applicable law). Where you have provided us with your consent previously but do not wish to be contacted by us about our projects in the future, please let us know by email at [jwlinfo@jwl.org](mailto:jwlinfo@jwl.org). You can opt out of receiving emails from the JWL at any time by clicking the "unsubscribe from this list" link at the bottom of our emails.

## 7. Donations

When you use our secure online donation function you will be directed to a specialist payment services provider who will receive your financial information to process the transaction. We will provide your personal information to the payment services provider only to the extent necessary for the purpose of processing your donation.

## 8. How long do we keep your personal information?

In general, unless still required in connection with the purpose(s) for which it was collected and/or processed, we remove your personal information from our records six years after the date it was collected. However, if before that date (i) your personal information is no longer required in connection with such purpose(s), (ii) we are no longer lawfully entitled to process it or (iii) you validly exercise your right of erasure (please see Section 11 below), we will remove it from our records at the relevant time.

If you request to receive no further contact from us, we will keep some basic information about you on our suppression list in order to comply with your request and avoid sending you unwanted materials in the future.

## 9. Will we share your personal information?

**We do not sell or rent your personal information to third parties for marketing purposes.** However, in general we may disclose your personal information to selected third parties in order to achieve the purposes set out in this Policy:

- JWL USA;
- suppliers and sub-contractors for the performance of any contract we enter into with them, for example IT service providers such as website hosts or cloud storage providers;
- financial companies such as Paypal that collect or process donations on our behalf;
- professional service providers such as accountants and lawyers;
- news media outlets;
- social media platforms (certain online identifiers, such as IP address, only);
- regulatory authorities, such as tax authorities;

In particular, we reserve the right to disclose your personal information to third parties:

- if we are under any legal or regulatory duty to do so; and/or
- to protect the rights, property or safety of JWL, its personnel, users, visitors or others.

## 10. Security/ storage of and access to your personal information

JWL is committed to keeping your personal information safe and secure and we have appropriate and proportionate security policies and organisational and technical measures in place to help protect your information.

Your personal information is only accessible by appropriately trained staff, volunteers and contractors, and stored on secure servers with features enacted to prevent unauthorised access.  
IT Security

For the purpose of handling security incidents and to help diagnosing problems with our servers, we automatically store log files of the data which your browser sends when visiting the page.

Additionally we collect diagnostic data which may include personally identifiable information, such as:

- Name (as you enter it to a form on our website)
- Email address (which you use to Login or enter on our website)
- Username (which you use on our website)
- Mobile Device ID (of your mobile device)
- IP Address (the number that is automatically assigned to your computer when you use the Internet)
- Browser type and -version
- Operating System
- Referrer URL (the page, from which this page was linked, including the search term, in case of a search engine)
- Time and date of the request.

## 11. International Data Transfers

Given that we are part of an international organisation and because we use agencies and/ or suppliers to process personal information on our behalf, it is possible that personal information we collect from you will be transferred to and stored in a location outside the European Economic Area (“EEA”), for example the United States.

Please note that some countries outside of the EEA have a lower standard of protection for personal information, including lower security requirements and fewer rights for individuals. Where your personal information is transferred, stored and/or otherwise processed outside the EEA in a country that does not offer an equivalent standard of protection to the EEA, we will take all reasonable steps necessary to ensure that the recipient implements appropriate safeguards (such as by entering into standard contractual clauses) designed to protect your personal information and to ensure that your personal information is treated securely and in accordance with this Policy. If you have any questions about the transfer of your personal information, please contact us using the details below.

Unfortunately, no transmission of your personal information over the internet can be guaranteed to be 100% secure – however, once we have received your personal information, we will use strict procedures and security features to try and prevent unauthorised access.

## 12. Exercising your Rights

Where we rely on your consent to use your personal information, you have the right to withdraw that consent at any time. You also have the following rights:

- **Right of access** – you can write to us to ask for confirmation of what personal information we hold on you and to request a copy of that personal information. Provided we are satisfied that you are entitled to see the personal information requested and we have successfully confirmed your identity, we will provide you with your personal information subject to any exemptions that apply.
- **Right of erasure** – at your request we will delete your personal information from our records as far as we are required to do so. In many cases we would propose to suppress further communications with you, rather than delete it.
- **Right of rectification** – if you believe our records of your personal information are inaccurate, you have the right to ask for those records to be updated. You can also ask us to

check the personal information we hold about you if you are unsure whether it is accurate/up to date.

- **Right to restrict processing** – you have the right to ask for processing of your personal information to be restricted if there is disagreement about its accuracy or legitimate usage.
- **Right to object** – you have the right to object to processing where we are (i) processing your personal information on the basis of the legitimate interests ground, (ii) using your personal information for direct marketing or (iii) using your information for statistical purposes.
- **Right to data portability** – to the extent required by the GDPR, where we are processing your personal information (that you have provided to us) either (i) by relying on your consent or (ii) because such processing is necessary for the performance of a contract to which you are party or to take steps at your request prior to entering into a contact, and in either case we are processing using automated means (i.e. with no human involvement), you may ask us to provide the personal information to you – or another service provider – in a machine-readable format.
- **Rights related to automated decision-making** – you have the right not to be subject to a decision based solely on automated processing of your personal information which produces legal or similarly significant effects on you, unless such a decision (i) is necessary to enter into/perform a contract between you and us/another organisation; (ii) is authorised by EU or Member State law to which JWL is subject (as long as that law offers you sufficient protection); or (iii) is based on your explicit consent.

We may ask you for additional information to confirm your identity and for security purposes, before disclosing personal information requested to you. Please note that some of these rights only apply in limited circumstances. For more information, we suggest that you contact us using the details below.

You are further entitled to make a complaint about us or the way we have processed your personal information to the data protection supervisory authority in your home country. In the Switzerland, the data protection authority is the Federal Data Protection and Information Commissioner (FDPIC) <http://www.privatim.ch/de/privatim/> In Germany, it is Die Bundesbeauftragte für den Datenschutz und die Informationsfreiheit <http://www.bfdi.bund.de/>. For further information on how to exercise this right, please contact us using the details below.

### 13. Changes to this Policy

We may update this Policy from time to time. We will notify you of significant changes by contacting you directly where reasonably possible for us to do so and by placing an update Policy on our website. This Policy was last updated on 25 May 2018.

### 14. Links and third parties

We link our website directly to other sites. This Policy **does not** cover external websites and **we are not responsible** for the privacy practices or content of those sites. We encourage you to read the privacy policies of any external websites you visit via links on our website.

## **15. Cookies**

In order to optimize our services, we use cookies on different pages of the JWL platform. Cookies are small text files that are stored on your device. Some of the cookies will be deleted at the end of your browser session (so-called session cookies). Other cookies may remain on your device and allow us to identify your browser the next time you visit the JWL platform (so-called persistent cookies).

If any of the cookies which are implemented on our websites process personal information, then only for the purpose of improving the usability of the websites and within our legitimate interest in accordance with Art. 6 para. 1 lit. f EU GDPR.

You can set your browser so that it enables you to decide in each case whether or not to accept or reject all cookies or specific cookies being installed by a webpage. In case of non-acceptance of cookies, the functionality of the JWL platform may be limited. More information about the cookie settings for your browser can be found under following links:

Google Chrome: <https://support.google.com/chrome/answer/95647> Mozilla Firefox: <https://support.mozilla.org/en-US/kb/enable-and-disable-cookies-website-preferences> Microsoft Internet Explorer: <https://support.microsoft.com/en-us/help/17442/windows-internet-explorer-delete-manage-cookies> Apple Safari: <https://support.apple.com/kb/ph21411> Opera: <http://help.opera.com/Windows/10.20/en/cookies.html>

## **16. How to contact us**

Please let us know if you have any questions or concerns about this Policy or about the way in which JWL processes your personal information by contacting us at the following channels:

- Email: [jwlinfo@jwl.org](mailto:jwlinfo@jwl.org)
- Telephone: +41 (0)22 525 3833
- Post: Jesuit Worldwide Learning (JWL), 18 Rue Jacques-Dalphin, 1227 Carouge, Geneva, Switzerland