

Last updated 2019-05-06

RAOUL WALLENBERG ACADEMY'S INTEGRITY POLICY

Your personal integrity is a human right which we protect!

PERSONAL DATA PROCESSING

” No one shall be subjected to arbitrary interference with his privacy, family, home or correspondence, nor to attacks upon his honour and reputation. Everyone has the right to the protection of the law against such interference or attacks.” – Article 12, United Nations Universal Declaration of Human Rights.

Your personal integrity is important for the Raoul Wallenberg Academy (RWA), and something we want to protect. We are required to process personal data in order for us to develop our activities, offer services and training, as well as communicate our projects. Information on which personal data the Raoul Wallenberg Academy processes, for which purposes, on which legal basis, and for what duration of time is found below. This policy also explains your rights and how you can apply them.

It is important that you learn about our integrity policy and are comfortable in our processing of your personal data. You are welcome to contact us if you have any questions.

PERSONAL DATA

Personal data is any information which is directly or indirectly referable to a natural person. You submit your personal data to us when you apply for a programme on our website, contact us, apply for an event, or subscribe to one of our news or information broadcasts. Examples of personal data are name, personal ID number, e-mail address, telephone number, application material, and billing and mailing addresses. Further, we process information regarding how you use RWA's website, your IP address, and your geographical information.

RWA's processing of personal data is in accordance with the General Data Protection Regulation (Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016) ("GDPR"). This implies that among other aspects we do not handle personal data to a larger extent than what is required to fulfil our organisational goals, or for purposes other than those listed below.

We process various categories of personal data, with varying purposes and legal bases. In addition, the duration in which personal data is stored varies depending on the purpose for which we process your personal data. **The various processes are presented below – so that you can easily learn about the personal data policy relevant for you.**

PERSONAL DATA CONTROLLER

Raoul Wallenberg Academy for Young Leaders, organisational number 802424-1740 (Grev Turegatan 44, 114 38, STOCKHOLM, e-mail: info@rwa.se) is the personal data controller for the foundation's processing of your personal data. You can contact us at any time with questions or thoughts regarding how we process your personal data.

YOUR RIGHTS

In accordance with applicable law you have a number of rights which give you information about, and control of, your own personal data. A short summary of your rights is as follows:

The right to information and access to your personal data

You have the right to know if we have your personal data, and if we do we will inform you about how your personal data is handled. You have the right to request copies of these data.

The right to amend

You have the right to request an amendment if you believe that our data regarding you is incorrect. You also have the right to request an amendment if something is missing.

The right to object

You have the right to object to our processing of your data with regard to balance of interests. Processing of your data shall cease if we cannot show that our interests for processing your data weigh heavier than your interests.

The right to deletion

You have the right to request that we delete your personal data. For example, you may consider that the data is no longer needed for the purpose for which it was collected, or that the processing of personal data is based on your consent which you want to withdraw.

RAOUL WALLENBERG ACADEMY'S PROCESSING OF YOUR PERSONAL DATA

We process various categories of personal data with various purposes and legal bases. In addition, the duration in which personal data is stored varies depending on the purpose for which we process your personal data. The various processes are presented below – so that you can easily understand the personal data policy relevant for you.

What we use your data for

In order to process your data there must be support in relevant legislation – there must be legal basis. To process your personal data in accordance with the law it is required that such action is necessary

- To fulfil an agreement with you
- To fulfil a legal obligation of the Order of the Teaspoon.

Processing of your personal data can also be done

- After a balance of interest where the Order of the Teaspoon's interest to process data is weighed against your interest to protect your integrity
- After you have given consent to processing. Consent is submitted separately and you can always withdraw consent by contacting us.

Who we can share your personal data with

Raoul Wallenberg Academy engages external suppliers to provide the services we require in order to implement our programmes. These suppliers act as personal data assistants for us when they process information on our behalf and according to our instructions. We have personal data assistants who assist with:

- 1) Our gift shop (where we sell our goods)
- 2) Logistics (logistical companies and forwarding agents)
- 3) Payment solutions (payment companies, banks, and other payment service providers)
- 4) Marketing (print and distribution, social media, media firms or advertising firms)
- 5) IT services (companies who manage necessary operations, technical support, and maintenance of our IT solutions).

When personal data is shared with a third party we require that the third party agrees to protect and process your personal data in accordance with applicable law, regulations, and contractual agreements, as well in accordance with other instructions from us. When your personal data is transferred to and processed by recipients outside the EU/EES, e.g. the USA, we ensure that the recipients are certified in accordance with the EU-U.S. Privacy Shield (or equivalent for other countries), thereby ensuring a suitable level of protection for personal data from a European legal data protection perspective.

INFORMATION PROTECTION

We will take appropriate technical and organisational action to protect your personal data in accordance with applicable data protection law. We will only use approved service providers to ensure that your personal data is protected. Computers and servers used to store personal data are stored in a secure environment.

We process your personal data

1. [WHEN YOU REGISTER FOR OUR NEWSLETTER](#)
2. [WHEN YOU MAKE A PURCHASE IN OUR WEB STORE](#)
3. [WHEN YOU MAKE A DONATION](#)
4. [WHEN YOU HAVE REGISTERED FOR A COURSE, SCHOOL PROGRAMME, OR EVENT](#)
5. [COOPERATION OR POTENTIAL COOPERATION](#)
6. [WHEN YOU HAVE ORDERED MATERIAL FROM US](#)
7. [WHEN YOU APPLY FOR A JOB OR INTERNSHIP WITH US](#)
8. [WHEN YOU CONTACT US](#)
9. [WHEN YOU ARE PRESENT IN PHOTOGRAPHS, VIDEO, OR SOUND RECORDINGS](#)
10. [WHEN YOU MAKE A NOMINATION FOR A PRIZE, ARE NOMINATED, OR RECEIVE A PRIZE](#)
11. [WHEN YOU VISIT OUR WEBSITE OR USE OUR MATERIAL](#)
12. [OUR USE OF COOKIES](#)

I. WHEN YOU REGISTER FOR OUR NEWSLETTER

Why do we collect information? To market our operations and events, and to provide information about RWA and Raoul Wallenberg.	Which information is processed? <ul style="list-style-type: none">• E-mail address	How do we use this information? Direct marketing.
Legal basis Legitimate interest: Your personal data is processed in order to send you the newsletter which you subscribed to.		
Duration of storage We process your personal data as long as you are a registered subscriber to our newsletter. You can at any time cancel your subscription by either following the link provided in each newsletter or by contacting info@rwa.se . Our processing of your personal data ceases when you cancel your subscription.		

2. WHEN YOU MAKE A PURCHASE IN OUR GIFT SHOP

<p>Why do we collect information?</p> <p>In order to process the order/purchase, and to develop and improve our assortment.</p>	<p>Which information is processed?</p> <ul style="list-style-type: none"> • Name • Address • E-mail address • Telephone number • Credit card number • Purchase information (the product that was ordered) 	<p>How do we use this information?</p> <p>In order to 1) deliver the product you have purchased and to accept payment, 2) fulfil the agreement which is entered into in conjunction with an order in our gift shop.</p>
<p>Legal basis</p> <p>Completion of the purchase agreement. The collection of your personal data is required in order for us to fulfil our obligations in accordance with the purchase agreement. Without such data we are unable to fulfil our obligations and are thus forced to deny your purchase.</p>		
<p>Duration of storage</p> <p>Until the purchase is completed (including delivery and payment), and for a period of 36 months thereafter in order to process any returns and warranty claims.</p>		

3. WHEN YOU MAKE A DONATION

<p>Why do we collect information?</p> <p>The collection of funds for active projects within RWA's operations.</p>	<p>Which information is processed?</p> <ul style="list-style-type: none"> • Name • E-mail address • Address • Telephone number • Credit card details or bank account • Personal number 	<p>How do we use this information?</p> <p>In order to 1) receive and register gifts and donations, 2) provide good service and offer relevant information (note that you can at any time decline further contact with us), 3) perform analyses to improve the cost-effectiveness of our collection efforts.</p>
<p>Legal basis:</p> <p>Fulfilment of agreement as well as legitimate interest: Processing of your personal data is required so that we can fulfil our obligations in accordance with agreements of e.g. monthly donations. Furthermore, your data is processed with a legitimate interest and according to the above purpose.</p>		
<p>Duration of storage</p> <p>From the time of donation and for a period of 36 months subsequent.</p>		

4. WHEN YOU HAVE REGISTERED FOR A COURSE, SCHOOL PROGRAMME, OR EVENT

<p>Why do we collect information? In order to perform our operations in the best manner, and to cater to your needs and wishes.</p>	<p>Which information is processed?</p> <ul style="list-style-type: none"> • Name • E-mail address • City • Telephone number (removed after participation) • Job title • School • Date of birth (removed after participation) • Payment status (removed) • Meal preferences (sensitive data removed after participation) • Motivation – why one wants to participate (removed after participation) • Photographs / video • Any specific needs (sensitive data – removed after participation) • Year of participation 	<p>How do we use this information?</p> <p>When you participate in our programmes your personal data is used to 1) implement the programme, 2) cater to your wishes, 3) send relevant information, 4) visualise geographical reach as we actively work with diversity and representation, 5) send updated information and event invitations, 6) invoicing, 7) create networks.</p> <p>After participation: 1) perform analyses based on your evaluation, 2) further cooperation in other ways, 3) event invitations, 4) send new material, 5) showcase school /alumni activities, 6) learn which schools have participated, 7) visualise geographical reach.</p> <p>Note that you can refuse further contact with us at any time.</p>
<p>Legal basis: Legitimate interest: your personal data is processed so that we can develop our programmes in a way that we believe has meaning for you and our common goals.</p>		
<p>Duration of storage In advance of, during, and after courses/school programmes/events, e.g. distribution of material and evaluation forms. The data will be active again if a person or school wishes to participate again. After three years since a person last showed interest we will anonymize personal data by removing individual names. Only the number per school will remain.</p>		

5. COOPERATION OR POTENTIAL COOPERATION

<p>Why do we collect information? To develop RWA's programmes in the best way,</p>	<p>Which information is processed?</p> <ul style="list-style-type: none"> • Name • E-mail address 	<p>How do we use this information? To facilitate further contact with you. Your personal data may</p>
--	---	---

as well as to create conditions for a sustainable society together with you.	<ul style="list-style-type: none"> • Address • Telephone number • Company/organisation • Title • Where we met 	appear in protocols, meeting notes, as an invoice reference or similar if you are in contact with us through your profession or are involved in our programmes in another way.
<p>Legal basis</p> <p>Legitimate interest: Your personal data is processed so that we can maintain an ongoing cooperation or take initiative for future cooperation.</p>		
<p>Duration of storage</p> <p>We will store your personal data as long as we have an ongoing cooperation, or plans for upcoming cooperation, and for three years subsequent.</p>		

6. WHEN YOU HAVE ORDERED MATERIAL FROM US

<p>Why do we collect information?</p> <p>To process your order, offer relevant services, and to develop and improve our projects.</p>	<p>Which information is processed?</p> <ul style="list-style-type: none"> • Name • E-mail address • School • Title • Address 	<p>How do we use this information?</p> <p>In order to 1) fulfil our agreement with you, 2) enable good service and offer relevant information, 3) perform analyses based on the material you ordered.</p> <p>Note that you can refuse further contact with us at any time.</p>
<p>Legal basis</p> <p>Fulfilment of agreement: the collection of your personal data is required so that we can fulfil our obligations according to the order. Without such data we are unable to fulfil our obligations and are thus forced to deny your purchase.</p>		
<p>Duration of storage</p> <p>From the time of order and 24 months subsequent in order to process any returns and warranty claims, as well as according to the above-described purpose. Thereafter information no longer required by us will be removed or anonymized.</p>		

7. WHEN YOU APPLY FOR A JOB OR INTERNSHIP WITH US

<p>Why do we collect information? In order to choose the most suitable individual for the position, as well as to administer the employment and internship.</p>	<p>Which information is processed?</p> <ul style="list-style-type: none"> • Name • Personal number • E-mail address • Address • Telephone number • Photograph (for employment) • References • Number of sick-leave days(sensitive data) • Salary (sensitive data) 	<p>How do we use this information?</p> <ul style="list-style-type: none"> • In order to 1) determine if you are the person we seek for the offered position and to contact you, 2) be able to offer you relevant services. • When you are employed or have an internship with us your personal data is used for personnel administration, salary administration, and to ensure your physical security, as well as to ensure our IT- and information security. • To communicate our staff to an external party via e.g. our website and newsletter.
<p>Legal basis Fulfilment of agreement, legal obligation, as well as legitimate interest: Your personal data is processed so that we can conduct recruitment and administer your position, as well as so that we can develop our programmes in a way that we believe has meaning for you and our common goals.</p>		
<p>Duration of storage We store your data in advance of, during, and subsequent to the recruitment process so that we can communicate with you. For employment your data will be saved until the employment ends and 12 months subsequent. Salary specifications are stored in accordance with relevant law.</p>		

8. WHEN YOU CONTACT US

<p>Why do we collect information? In order to effectively maintain contact regarding current cooperation.</p>	<p>Which information is processed?</p> <ul style="list-style-type: none"> • Name • E-mail address • Telephone number 	<p>How do we use this information? In order to 1) address your correspondence and process queries, 2) enable good service and offer relevant information, 3) follow up on your errand. This is applicable regardless of communication channel. Note that you can refuse further contact with us at any time.</p>
--	--	--

Legal basis

Legitimate interest: Your personal data is processed so that we can develop our programmes in a way that we believe has meaning for you and our common goals.

Duration of storage

Your personal data is processed as long as you have a relation with us. Thereafter the data is deleted or anonymized which is no longer needed by us, up to 36 months subsequent. An exception is for applicable law if your data is found in e.g. invoices.

9. WHEN YOU ARE PRESENT IN PHOTOGRAPHS, VIDEO, OR SOUND RECORDINGS

<p>Why do we collect information?</p> <p>To communicate our programmes in a relevant and positive way to an interested public.</p>	<p>Which information is processed?</p> <ul style="list-style-type: none"> • Photograph of you • Video with you • Your voice in a sound recording 	<p>How do we use this information?</p> <ul style="list-style-type: none"> • To show how our efforts and our projects work, using our website, presentations, reports, or applications. • For communication in social media.
<p>Legal basis</p> <p>Consent and legitimate interest: Your personal data is processed so that we can develop our programmes in a way that we believe has meaning for you and our common goals. Regarding photography, video, or sound recordings of persons under 15 years of age we process personal data based on voluntary consent which clearly explains the purpose of the personal data to be processed. Such consent can be recalled at any time. Legitimate interest applies regarding photography, video, or sound recordings for persons over 15 years of age.</p>		
<p>Duration of storage</p> <p>Your personal data is processed until you recall consent or until the project is completed. Maximum 36 months. Printed imagery, published films and communication via social media etcetera are stored until you notify us that the photograph/video/sound recording containing you shall be deleted. Photographs, video, and sound recordings with sensitive information are handled with extra care.</p>		

10. WHEN YOU MAKE A NOMINATION FOR A PRIZE, ARE NOMINATED, OR RECEIVE A PRIZE

<p>Why do we collect information? So that you can nominate yourself or others, as well as to enable the awarding of prizes.</p>	<p>Which information is processed?</p> <ul style="list-style-type: none"> • Name • E-mail address • Address • Telephone number • School • Date of birth <p>Those who travel to Budapest:</p> <ul style="list-style-type: none"> • passport number (deleted) • contact information of nearest relative (deleted) 	<p>How do we use this information? In order to 1) receive and administer nominations and based on such, choose the most suitable recipient, 2) read about and possibly contact those who are suggested / nominated, 3) administer the awarding of prizes and follow-up of prize recipients, 4) identify potential participants for our leadership training.</p>
<p>Legal basis Legitimate interest: Your personal data is processed so that we can develop our programmes in a way that we believe has meaning for you and our common goals.</p>		
<p>Duration of storage Your personal data is processed until the decision-making processes are completed, and for a period of time after the prize is awarded for administration and follow-up (applies to stipend recipients). We delete personal data of those who were nominated but did not advance (from the time they were nominated until the Raoul Wallenberg prize) 12 months after. We retain nominee data for 36 months. Winner data is retained longer for historical reasons.</p>		

11. WHEN YOU VISIT OUR WEBSITE OR USE OUR MATERIAL

<p>Why do we collect information? You wish to create an account</p> <p>You are participating in a contest</p>	<p>Which information is processed?</p> <ul style="list-style-type: none"> • e-mail address and chosen password <ul style="list-style-type: none"> • name • e-mail address 	<p>How do we use this information? To maintain account functionality, supply you with marketing material to the extent allowed by law, and with the purpose of analysing your interests for marketing purposes.</p> <p>To implement the contest, inform the winner, deliver the prize to the winner, and if appropriate implement the event, as well as for marketing and advertising purposes.</p>
--	---	--

Legal basis

Legitimate interest: you have submitted data to either create an account or participate in a contest.

Duration of storage

We store account information as long as you wish to maintain an account with us. You can cancel the account at any time. Data associated with a contest are deleted six months after the end of the contest.

12. OUR USE OF COOKIES

Why do we use cookies?

To improve your experience at our website.

What are cookies and how do we use them?

Cookies are a small text file consisting of letters and numbers sent out from our web servers, which are saved by your web reader or device. At raoulwallenberg.se we use the following cookies:

- 1) Session cookies (a temporary cookie which is deleted when you close your web reader or device).
- 2) Permanent cookies (cookies which remain on your computer until you remove them or they expire).
- 3) First-party cookies (cookies which are placed by the website you are visiting).
- 4) Third-party cookies (cookies which are placed by a third-party website. We use these primarily for analysis, e.g. Google Analytics.).
- 5) Similar technology (technology which stores information on your web reader or in your device in a way which resembles cookies).

The cookies we use improve access to our website and identify recurring visitors. Some of our services require cookies in order to function properly, while others improve services for you. We use cookies for strategic analytical information regarding your use of our services, and to store functional settings such as language and other data.

Via Google Analytics we collect referral address, date and time of visit, type of web reader, geographical location, language and version of web reader software, and information regarding software and hardware. Via Albacross we gather further information about your IP-address.

Raoul Wallenberg Academy shows videos on our Youtube-channel which are imbedded in our website. Cookies are used by Youtube in conjunction with the presentation of these videos. We do not have access to or store this information.

We use the tool Hotjar to occasionally ask questions to our website visitors. Hotjar stores cookies for 365 days. You can follow the instructions on the below link if you do not want Hotjar to use cookies. <https://www.hotjar.com/opt-out>.

Can you control the use of cookies yourself?

Yes! Your web reader or device gives you the option to change settings for the use and scope of cookies. Go to settings for your web reader or device to learn more about how you adjust settings for cookies. Examples of what you can adjust are blocking of all cookies, to only accept first-party cookies, or to delete cookies when you shut down your web reader. You can read more about cookies on the Sweden Post and Telecom Authority website, www.pts.se.

Legal basis

Legitimate interest: In order to conduct marketing and customer analysis, methodology and business development, and to collect statistical documentation. We need to process your personal data as above in order to fulfil these interests.

Duration of storage

The length of time that your personal data is processed depends on which type of cookie is activated. Maximum is 24 months.

COMPLAINTS

If you are dissatisfied and have a complaint regarding any aspect of RWA's processing of your personal data you have the right to submit a complaint to the regulator at the Swedish Data Protection Authority (datainspektionen.se, datainspektionen@datainspektionen.se, telephone number: 08 657 61 00).

We may make changes to our integrity policy. The latest version of the policy is always available here on our website.