

#### PRIVACY POLICY International Fellowship of Birdwatching Rotarians

# Introduction

The International Fellowship of Birdwatching Rotarians (IFBR) respects your privacy and is committed to protecting it by complying with this privacy policy ("Policy"). Safeguarding the data entrusted to our care by our Fellowship members, program participants, and others is of the utmost importance to us.

This Policy describes our practices for collecting, using, protecting, disclosing, and disposing of personal data. It also describes the types of data that we may collect from you or that you may provide to us when you:

- Visit our website, IFBR.org
- Join or maintain membership in this Fellowship
- Register for or attend events we host
- Participate in our programs

If you are a resident of the European Union (EU) or European Economic Area (EEA) and we collect your personal data, we will process your data in accordance with applicable laws that regulate data protection and privacy. This includes, without limitation, the EU General Data Protection Regulation (2016/679; "GDPR") and EU member state national laws that implement or regulate the collection, processing, and privacy of your personal data (together, "EU Data Protection Law"). This Policy provides information on your legal rights under EU Data Protection Law and how you can exercise them.

### Data We Collect About You and How We Collect It

We collect several types of personal data, including information by which you could be personally identified, such as your name, email address, city, state and country where you reside, your club name and Rotary District number or other sensitive information that might identify you ("personal data").

We collect data from the following people:

- People who participate in Fellowship programs, such as our annual post-convention bird watching outing.
- Donors to IFBR
- People who join IFBR

We collect this data:

• Directly from you when you provide it to us

### Data You Provide to Us

We collect personal data you provide when you interact with our Website-or with the Fellowship, including any interaction offline or in person, such as when you:

- Join this Fellowship
- Register for IFBR Fellowship events
- Provide personal data on paper forms

**Usage Details, IP Addresses, Cookies, and Other Technologies** As you interact with our Website, we do not automatically collect data about your equipment or your browsing actions and patterns.

# How We Use Your Personal Data

We use the personal data about you that we collect or that you provide to us to:

- Present our Website and its content to you
- Perform our core business purposes, including:
  - Processing financial transactions
  - Communicating key organizational messages through IFBR publications and other materials
  - Supporting the programs and members of IFBR
  - Complying with legal requirements

Unless you opt out, we will make your name, email address, city, state, country Rotary Club and Rotary District available in the Members Only section of our website.

# Lawful Grounds on Which We Collect and Process Personal Data

We process your personal data for the above purposes, relying on one or more of the following lawful grounds under EU Data Protection Law:

- When you have freely provided your specific, informed, and unambiguous consent for our Fellowship to process your personal data for particular purposes
- When we agree to provide services to you, in order to set up and perform our contractual obligations to you and/or enforce our rights
- When we need to process and use your personal data in connection with our legitimate interests and need to be able to effectively manage and operate our Fellowship; we will always seek to pursue these legitimate interests in a way that does not unduly infringe on your legal rights and freedoms and, in particular, your right to privacy; and/or
- When we need to comply with a legal obligation or for the purpose of us being able to establish, exercise, or defend legal claims

Please also note that some of the personal data that we receive and that we process may include what is known as "sensitive" or "special category" personal data about you, for example, personal data regarding your health. This is not the type of data that the Fellowship routinely collects, but if we process such sensitive or special category data, we will do it only in specific situations in which:

- You have provided us with your explicit consent to use it
- We have a legal obligation to process such data in accordance with EU Data Protection Law
- It is needed to protect your vital interests (or those of someone else), for example, in a medical emergency
- You have clearly chosen to publicize such information; or
- It is needed in connection with a legal claim that we have or may be subject to

### **Disclosure of Your Personal Data**

We may disclose aggregated data about our users, or data that cannot be used to identify any individual, without restriction.

We may disclose the personal data that we collect or that you provide as described in this Policy to:

• Rotary International, to meet Rotary Fellowship membership and program requirements (read Rotary's privacy policy at <u>rotary.org/privacy</u>)

We may also disclose your personal data:

- To comply with a court order, law, or legal process, or respond to a government or regulatory request
- If we believe disclosure is necessary or appropriate to protect the rights, property, or safety of members, participants in this Fellowship's programs and events, this Fellowship, Rotary International, or others

We may disclose your personal data to certain third-party organizations that will process data solely in accordance with our instructions ("data processors"), such event organizers, as well as professionals we hire such as lawyers, insurers, auditors, or accountants. We use only Data Processors that can guarantee to us that they have adequate safeguards to protect the personal data they process on our behalf.

In certain circumstances, we may also disclose your personal data to third parties called "Data Controllers." Due to the nature of the business of the Data Controllers, they will make their own determinations about how they process your personal data. As Data Controllers, they are required to follow the EU Data Protection Law, to protect personal data with adequate safeguards, and to notify you if their processing goes beyond the instructions Fellowship provided to the Data Controller.

# How Long We Retain Your Personal Data

IFBR retains personal data that identifies you as long as necessary according to circumstances — for example, as long as you are a member of this fellowship or have a relationship with this fellowship. The criteria we use for determining the relevant retention and disposal periods are based on the purpose for which we hold data and the reasonable expectations of those whose personal data we collect, taking into account various legislative requirements and guidance issued by relevant EU regulatory authorities.

### **Disposing of Your Personal Data**

Personal data that we no longer need will be disposed of and/or anonymized so you can no longer be identified from it.

#### Choices About How We Use and Disclose Your Personal Data We use your information only for communications with you.

# Your Personal Data Rights

You have a "subject access request" right, under which you can request information about the personal data about you that we hold, what we use that personal data for, who it may be disclosed to, and certain other information.

You may request in writing:

- That we correct personal data that we hold about you that is inaccurate or incomplete
- That we erase your personal data without undue delay if we no longer need to hold or process it
- To object and/or to restrict the use of your personal data to a purpose other than those set out above unless we have a compelling, legitimate reason; or

If you would like to exercise any of the rights above, please contact us at ifbr.birding@gmail.com

If you make a request and are not satisfied with our response, or if you believe that we are illegally processing your personal data, you have the right to complain to your country's supervisory authority under GDPR.

## Children Under the Age of 16

Our Website is not intended for children under 16 years of age. We do not knowingly collect personal data from children under 16 without parental consent. No one under age 16 may provide any personal data through our Website. If you are under 16, do not: use or provide any personal data on our Website or on or through any of its features, register on our Website, make any purchases through our Website, use any of the interactive or public comment features of our Website, or provide to us any personal data about yourself, including your name, address, telephone number, email address, or any screen name or user name. If we learn that we have collected or received personal data from a child under 16 without verification of parental consent, we will delete that personal data. If you believe we might have any personal data from or about a child under 16, please contact us at ifbr.birding@gmail.com

### **Data Security**

Your first and last name, email address, country, Rotary District and Rotary Club will be in a Members Only section on our website.

### **Changes to Our Privacy Policy**

IFBR may change, add, or remove portions of this Policy at any time. These modifications shall take effect immediately on being posted on this page. The date the Policy was last revised is noted at the bottom of the page. It is your responsibility to review this Policy for any changes.

#### **Contact Information**

If you have any questions about our Rotary Club's privacy protection practices, please contact us at ifbr.birding@gmail.com

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