



## Privacy Policy

This Privacy Policy sets out how The World Organisation Against Torture (OMCT) uses and protects any personal data that you provide OMCT either electronically or otherwise via this Website or directly to OMCT. As a data user we wish to assure you that we respect your privacy and are committed to maintaining, observing and safeguarding the confidentiality of your personal data.

For the purpose of this Privacy Policy, the term "we", "us" and "OMCT" shall include OMCT and its affiliates and the term "you" refers to all customers, visitors and users of this website.

This Privacy Policy is not intended to, nor does it create any contractual rights whatsoever or any other legal rights, nor does it create any obligation on OMCT in respect of any other party or on behalf of any party.

OMCT reserves the right to amend this Privacy Policy from time to time without prior notification to reflect changes in the applicable law, our business or Website. You should therefore review this Privacy Policy periodically to ensure you are familiar with its terms. In the event material changes are made to the Privacy Policy we will notify you by placing a prominent notice on the Website.

### 1. PERSONAL DATA COLLECTED

#### 1.1 Personal Data which OMCT collects includes:

1. any information collected or obtained such as your name, email address, phone number, home address, date-of-birth, etc and such personal information provided to any of OMCT;
2. any information collected or obtained such as when you register online via this Website, which may include personal data such as your name and contact details;
3. personal information collected when you submit your resume or application to us for consideration of employment;

4. the content of electronic forms you submit via email requesting us to provide services or information, or to take any actions;
5. information submitted if you participate in our survey or competition whether via online or otherwise; and
6. any messages or comments you submit via this Website, which may include personal data such as name, email address and telephone number.

## **2. CONSENT AND PURPOSE OF COLLECTION**

2.1 By providing any of your personal data to OMCT whether online or otherwise, you acknowledge that you have read, understood and agree to our Privacy Policy and you consent to the collection, retention and use of your personal data by us for any of the following purposes:

1. fulfilling your instructions and providing you with services under any of OMCT's organisation;
2. marketing of activities and services and sending any advertising and/or promotional material to you via telephone calls, emails or short message services if you have checked the consent box in the Newsletter sign-up form on this Website;
3. conducting research on planning, product, goods, services, security and testing for any OMCT;
4. notifying you of special campaigns, current and future activities that we consider might be of interest to you and for similar updates and promotion reasons via our Newsletter;
5. performing statistical analysis of your behaviour and characteristics in order to measure interest in and use of the various sections of this Website;
6. purposes connected with the operation, administration, development or enhancement of OMCT's activities or this Website;
7. where required by law, where we consider that such use or disclosure is necessary to respond to any claims or legal process, or where OMCT suspects that fraud or unlawful activity has been, is being or may be engaged in;
8. making such disclosures as may be required for any of the above purposes or by law;
9. where you have provided your resume, considering you for any jobs that may arise in OMCT, and if applicable, your terms and conditions of employment; and

10. carrying out studies to monitor OMCT's recruitment initiatives

2.2 Please note that in the event that sufficient personal data is not supplied, or is not satisfactory to OMCT then your application or request to OMCT for any of the above purposes under 2.1 may not be accepted or acted upon.

### 3. COOKIES

Like most websites, our Website may place a "cookie" - a small text file - in the browser of your computer. This cookie will assign you a unique number that allows us to save your information so that the information does not need to be re-entered. Cookies can be either "session" or "persistent" based. Our Website uses both types of cookies.

Persistent cookies are stored on your computer, contain an expiration date (by default the cookies expire after 23 days), and may be used to track your browsing behaviour upon return to the issuing website or component (such as plugins or embedded media, e.g., a YouTube video embedded on our website). You can remove persistent cookies by following directions provided in your internet browser's settings.

Session cookies are short-lived, are used only during a browsing session, and expire when you exit/quit your browser.

You may refuse to accept cookies by activating the setting on your browser which allows you to refuse the setting of cookies. Instructions on how to do so will vary from browser to browser but you can find out more at [www.aboutcookies.org](http://www.aboutcookies.org). Some features and functionality may be lost if you choose to disable cookies. Also, remember that you will have to adjust the cookie settings for each browser and device and you use to visit the OMCT website.

Our Website may contain links to other sites that may use cookie technology. We do not have access to, or control over, these cookies.

What cookies do we use?

- **Google Analytics:** We use Google analytics to see how our site is performing. The full list of Google Analytics cookies are below. Google

analytics collects no personal data or IP addresses.

- **Google Optimize:** We use Google Optimize to help us understand how visitors engage with the OMCT website. Google Optimize collects no personal data or IP addresses.
- **Google Adwords:** We use Google Adwords to help us create more targeted OMCT adword campaigns, these are the adverts you see in search results.
- **Facebook:** We use Facebook to measure the effectiveness of our paid facebook campaigns. It also helps us find out if are effectively communicating to the right audiences. This is done in accordance with Facebook's policies which can be found on their website.

## 4. DISCLOSURE

4.1 You further consent that personal data may be disclosed and transferred within the OMCT, which may include transfer to other parts of the OMCT in different jurisdictions. Other than to those individuals and entities listed below, your personal data will not be revealed by OMCT to any external body, unless we have your permission, or in some cases, to disclose information to governmental or other regulatory authorities for the prevention or detection of crime, or for the purpose of investigations or for compliance with any other law or an order of court. In that event, we may be precluded from seeking your consent to notify and/or from informing you that notification has been made.

4.2 The personal data provided by you may be disclosed by OMCT to:

- Other affiliates within OMCT
- OMCT's Agents and Contractors acting on our behalf
- Any relevant financial institutions
- Any referee whose details are provided by you, to verify or obtain additional information including education institutions, current/previous employers
- Third Party Service Providers (including management of this Website), for OMCT's operational, administration and development requirements
- Auditors, lawyers, professional advisory, debt collectors, bankers, advertising companies, recruitment agencies, researchers, utility and security services to use, disclose, hold, process, retain or transfer such personal data for the purposes of (2.1) above for and on behalf of OMCT

4.3 Each of the above parties, other than Regulators and your referees, are similarly bound by a duty of confidentiality to OMCT in respect of all

information disclosed to them.

4.4 OMCT uses and discloses aggregated non-personally identifying information collected through this Website as part of OMCT's process of constantly improving this Website and/or OMCT's organization activities.

## **5. SECURITY**

5.1 We have put in place appropriate physical, electronic, and administrative procedures to safeguard and help prevent unauthorised access, disclosure, loss, misuse and to maintain data integrity.

5.2 All reasonable precautions are taken to secure your personal data but we cannot guarantee that your information will never be disclosed in a manner inconsistent with this Privacy Policy due to unauthorized or illegal acts of third parties in violation of existing laws or the policies of OMCT.

## **6. STORAGE AND RETENTION OF THE PERSONAL DATA**

6.1 Your personal data may be stored either in hard copies in OMCT's offices or stored in servers located in a country where OMCT operates, which are operated by OMCT or its service providers.

6.2 Any personal data supplied by you will be retained by OMCT as long as necessary for the fulfillment of the purposes stated in (2.1) above or is required to satisfy legal regulatory, accounting requirements or to protect OMCT's interests. As a general rule the maximum retention period is 7 years.

6.3 OMCT does not offer any online facilities for you to delete your personal data held by OMCT.

6.4 OMCT will take reasonable steps to protect your personal data from misuse and loss and from unauthorised access, modification or disclosure.

## **7. COMMUNICATION OR UTILISATION DATA**

7.1 Through your use of telecommunications services to access this Website, your communications data (e.g. Internet protocol address) or utilization data (e.g. information on the beginning, end and extent of each access, and information on the telecommunications services you accessed) are technically generated and could conceivably relate to personal data.

7.2 To the extent that there is a compelling necessity, the collection, processing and use of your communications or utilization data will occur and will be performed in accordance with the applicable data privacy protection legal framework.

## **8. CONFIDENTIALITY**

8.1 Personal Data held by OMCT will be kept confidential in accordance with this Privacy Policy.

8.2 Any questions, comments, suggestions or information other than personal data sent or posted to this Website, or any part of this Website by visitors will be deemed voluntarily provided to OMCT on a non-confidential and non-proprietary basis.

8.3 OMCT reserves the right to use, reproduce, disclose, transmit, publish, broadcast and/or post elsewhere such information freely as set out in (3.2) above

## **9. RIGHT OF ACCESS TO PERSONAL DATA**

9.1 You have the right of access to your personal data held by OMCT on payment of a prescribed fee and to request correction of the personal data that is inaccurate, incomplete, misleading or not up-to-date.

9.2 If you have any questions regarding this Privacy Policy or if you wish to request access to your personal data or if you wish to correct your personal data or if you wish to withdraw your consent to the OMCT for the processing of your personal data for the purposes as set out in (2.1) above or for the transfer of your personal data to the parties stated in (3.2) above, you may send your request in writing to the following address:

Organisation Mondiale Contre la Torture (OMCT)  
World Organisation Against Torture  
Case Postale 21  
1211 Geneva 8  
Switzerland