

International Dual Career Network

General Data Protection Regulation (GDPR)

Website privacy notice – Version 5.0

This is the privacy notice of IDCN (International Dual Career Network). In this document, "we", "our", or "us" refer to IDCN.

We are a not for profit association registered in Switzerland.

Our registered office is at Avenue de nestle 55, Vevey 1800

1. Introduction

- 1.1. This is a notice to inform you of our policy about all information that we record about you. It sets out the conditions under which we may process any information that we collect from you, or that you provide to us. It covers information that could identify you ("personal information") and information that could not. In the context of the law and this notice, "process" means collect, store, transfer, use or otherwise act on information.
- 1.2. We regret that if there are one or more points below with which you are not happy, your only recourse is to withdraw your membership from IDCN by emailing Shivani Bhardawaj: contact@idcn.info
- 1.3. We take seriously the protection of your privacy and confidentiality. We understand that all visitors to our website are entitled to know that their personal data will not be used for any purpose unintended by them and will not accidentally fall into the hands of a third party.
- 1.4. We undertake to preserve the confidentiality of all information you provide to us, and hope that you reciprocate.
- 1.5. Our policy complies with Switzerland law accordingly implemented, including that required by the EU General Data Protection Regulation (GDPR).
- 1.6. The law requires us to tell you about your rights and our obligations to you regarding the processing and control of your personal data. We do this now, by requesting that you read the information provided at www.knowyourprivacyrights.org
- 1.7. Except as set out below, we do not share, or sell, or disclose to a third party, any information collected through our website.

2. The bases on which we process information about you

The law requires us to determine under which of six defined bases we process different categories of your personal information, and to notify you of the basis for each category.

If a basis on which we process your personal information is no longer relevant, then we shall immediately stop processing your data.

If the basis changes then if required by law, we shall notify you of the change and of any new basis under which we have determined that we can continue to process your information.

3. Information we process because we you are member of the different IDCN chapters via your spouse/partner corporate membership.

When you create an account on our website by filling the membership form, to receive the event invite and save information which can be used to match your profile with the job available in the local IDCN chapter or similar service from us, or otherwise agree to our terms and conditions, a contract is formed between you and us.

To carry out our obligations connected to your membership we must process the information you give us. Some of this information may be personal information.

We may use it to:

- 3.1. Send information about IDCN' activities;
- 3.2. Correspond with you;
- 3.3. Invite you to an upcoming event;
- 3.4. Send you surveys about IDCN's activities
- 3.5. Usage by corporate members to match the job requirements
- 3.6. provide you with suggestions and advice on the jobs available

We process this information on the basis that you are a member of IDCN and you have agreed that we use the information to primarily for the membership and event invite purposes.

Additionally, we may aggregate this information in a general way and use it to provide class information, for example to monitor our performance with respect to a service we provide. If we use it for this purpose, you as an individual will not be personally identifiable.

We shall continue to process this information until your membership of IDCN or is terminated by either party under the terms of the membership.

4. Information we process with your consent

Through certain actions when otherwise there is no membership relationship between us, such as when you browse our website or ask us to provide you more information about our association, including job opportunities, your event invites and you provide your consent to us to process information that may be personal information.

Wherever possible, we aim to obtain your explicit consent to process this information, for example, by asking you to agree to our use of cookies.

Sometimes you might give your consent implicitly, such as when you send us a message by e-mail to which you would reasonably expect us to reply.

Except where you have consented to our use of your information for a specific purpose, we do not use your information in any way that would identify you personally. We may aggregate it in a general way and use it to provide class information, for example to monitor the performance of a page on our website.

If you have given us explicit permission to do so, we may from time to time pass your name and contact information to selected associates whom we consider may provide services or products you would find useful.

We continue to process your information on this basis until you withdraw your consent, or it can be reasonably assumed that your consent no longer exists.

You may withdraw your consent at any time by instructing us at email contact@idcn.info However, if you do so, you may not be invited to our events or offered our services further.

5. Information we process for the purposes of legitimate interests

We may process information on the basis there is a legitimate interest, either to you or to us, of doing so.

Where we process your information on this basis, we do after having considered:

- 5.1. whether the same objective could be achieved through other means
- 5.2. whether processing (or not processing) might cause you harm
- 5.3. whether you would expect us to process your data, and whether you would, in the round, consider it reasonable to do so
- 5.4. For example, we may process your data on this basis for the purposes of:
 - 5.5. record-keeping for the proper and necessary administration of IDCN
 - 5.6. responding to unsolicited communication from you to which we believe you would expect a response
 - 5.7. protecting and asserting the legal rights of any party
 - 5.8. insuring against or obtaining professional advice that is required to manage organisational or business risk
 - 5.9. protecting your interests where we believe we have a duty to do so

6. Information provided on the understanding that it will be shared with a third party

Our website allows you to create a job seeker profile/membership profile, where you may choose to fill the information which you would like to disclose as with a view to that information being read, copied, downloaded, or used by the corporate recruiters and IDCN Volunteers.

Examples include:

- 7.1. posting a message our LinkedIn group
- 7.2. Images on the website or LinkedIn groups
- 7.3. Various search word for finding eligible job candidates

- 7.4. clicking on shared feedback to convey your agreement, disagreement or thanks

In posting personal information, it is up to you to satisfy yourself about the privacy level of every person who might use it.

We do not specifically use this information except to allow it to be displayed or shared.

We do store it, and we reserve a right to use it only for event invitation or deactivation of your profile when you find the job or leave IDCN network due to any reason.

Once your information enters the public domain, we have no control over what any individual third party may do with it. We accept no responsibility for their actions at any time.

Providing your request is reasonable and there is no legal basis for us to retain it, then at our discretion we may agree to your request to delete personal information that you have documented due to your membership. You can make a request by contacting us at contact@idcn.info.

7. Complaints regarding content on our website

If you complain about any of the content on our website, we shall investigate your complaint.

If we feel it is justified or if we believe the law requires us to do so, we shall remove the content while we investigate.

Free speech is a fundamental right, so we must make a judgment as to whose right will be obstructed: yours, or that of the person who posted the content that offends you.

If we think your complaint is vexatious or without any basis, we shall not correspond with you about it.

8. Information relating to your method of payment

We do not store information about any payment method.

9. Job application and employment

The membership information if only completed fully by you can be used for job matching or for offering volunteering positions.

10. Sending a message to our support team

When you contact us, whether by telephone, or by e-mail, we collect the data you have given to us to reply with the information you need.

We record your request and our reply to increase the efficiency of our association.

We keep personally identifiable information associated with your message, such as your name and email address to be able to track our communications with you to provide a high-quality service.

11. Complaining

When we receive a complaint, we record all the information you have given to us.

We use that information to resolve your complaint.

If your complaint reasonably requires us to contact some other person, we may decide to give to that other person some of the information contained in your complaint

We may also compile statistics showing information obtained from this source to assess the level of service we provide, but not in a way that could identify you or any other person.

Use of information we collect through automated systems when you visit our website

12. Cookies

When a user visits a website, cookies are used to maintain the connection to that website.

A cookie is a small file of code which is stored on the user's browser (or the hard drive of the computer) if the user "agrees" to do so. Cookies in general help to provide the user with a good experience when they browse the website.

Your web browser should allow you to delete any you choose. It also should allow you to prevent or limit their use.

When you first visit our website, we ask you whether you wish us to use cookies. If you choose not to accept them, we shall not use them for your visit except to record that you have not consented to their use for any other purpose.

If you choose not to use cookies or you prevent their use through your browser settings, you will not be able to use all the functionality of our website. Please refer to this link to learn how to disable the cookie in the browser – <http://files.investis.com/info/disabling-cookies.html>.

We use cookies in the following ways:

- 13.1. to track how you use our website
- 13.2. to record whether you have seen specific messages we display on our website
- 13.3. to keep you signed in our site

13. Personal identifiers from your browsing activity

Google analytics activated on the website, record information such as your geographical location. Google also record information such as the type of computer or device and the screen resolution.

We use this information in aggregate to assess the popularity of the webpages on our website and how we perform in providing content to you.

Our website provider Investis is not dealing with any PII (personally identifiable information) of the user.

Disclosure and sharing of your information

14. Information we obtain from third parties

IDCN do not collect any information from any third parties it is a self-registration membership-based association.

Who can access the information from database?

- 15.1. IDCN Centre of expertise
- 15.2. IDCN Local chapter Partner President
- 15.3. IDCN Local chapter Vice President
- 15.4. IDCN Local chapter Membership team lead
- 15.5. IDCN Local chapter Membership Manager
- 15.6. One local access to each local corporate member
- 15.7. One global access to each global and local corporate member (used by recruitment teams in case of profile)

Our Database provider can generate reports about how and when their access was used on very short notice

In case of volunteers as well as the corporate members, the access is manually generated and shred along with the TMP manual. When they leave IDCN the access is taken away.

The main purpose of the access:

- 15.8. IDCN Event invitation
- 15.9. Job profile matching

15. Data may be processed outside the European Union

Our data is hosted in Romania and IDCN website is hosted in United Kingdom.

We may also use outsourced services in countries outside the European Union from time to time in other aspects of our business.

Accordingly, data obtained within Switzerland or any other country could be processed outside the European Union.

For example, some of the software our website uses may have been developed in the United Kingdom or in India.

We use the following safeguards with respect to data transferred outside the European Union:

- 16.1. the processor is within the same corporate group as our business or organisation and abides by the same binding corporate rules regarding data processing.
- 16.2. the data protection clauses in our contracts with data processors include transfer clauses written by or approved by a supervisory authority in the European Union [, specifically that in the country of Switzerland]
- 16.3. we comply with a code of conduct approved by a supervisory authority in the European Union [specifically that in the country of Switzerland]
- 16.4. our service providers are certified under an approved certification mechanism as provided for in the GDPR
- 16.5. both our organisation and the processor are public authorities between whom there is either a legally binding agreement or administrative arrangements approved by a supervisory authority in the European Union relating to protection of your information

Access to your own information

16. Access to your personal information

At any time, you may review or update personally identifiable information that we hold about you, by signing in to your account on our website.

17. Removal of your information

If you wish us to remove personally identifiable information from our website, you may contact us at contact@idcn.info.

Removing the profile means the person will no longer be a member of IDCN and will not be invited to any of the local events.

18. Verification of your information

When we receive any request to access, edit or delete personal identifiable information we shall first take reasonable steps to verify your identity before granting you access or otherwise taking any action. This is important to safeguard your information.

Other matters

19. Use of site by children

Our services are not intended for children under 18 years of age. No one under age 18 may provide any information to or on the services. We do not knowingly collect Personal Information from children under 18. If we learn that we have collected or received Personal Information from a child under 18 without verification of parental consent, we will delete that information. If you believe we might have any information from or about a child under 18, please contact us at contact@idcn.info

20. How you can complain

If you are not happy with our privacy policy or if have any complaint, then you should tell us by email by contacting IDCN Program Director Shivani Bhardawaj at contact@idcn.info.

If a dispute is not settled, then we hope you will agree to attempt to resolve it by engaging in good faith with us in a process of mediation or arbitration.

21. Retention period for personal data

Except as otherwise mentioned in this privacy notice, we keep your personal information only for as long as required by us

22.1. to invite you for the IDCN events;

- 22.2. to support you, just in case you want to reactivate your IDCN membership in case of loss of job etc

22. Review of this privacy policy

We may update this privacy notice from time to time as necessary. The terms that apply to you are those posted here on our website on the day you use our website.

IDCN has appointed a data protection officer – Mrs. Shivani Bhardawaj. If you have any question regarding our privacy policy, please email us at: contact@idcn.info

Finally, IDCN would like to thank the contributors who been instrumental in preparing this policy, Esq. Serena Faccio, Ms. Manisha Jha and Shivani Bhardawaj.