



**Conflict and
Environment
Observatory**

Privacy Policy

The Conflict and Environment Observatory (CEOBS) is committed to maintaining all personal data of its supporters, suppliers, and associate organisations and individuals working in partnership in a secure manner, in line with current legislation.

We keep our Privacy Policy under constant review and will update and strengthen it periodically. The most recent version of the Privacy Policy is reflected by the version date located at the bottom of this Privacy Policy. All updates and amendments are effective immediately.

What data do we collect and how do we use it?

CEOBS collects supporters' data in order to keep records of campaigning or donating activity and to update followers and supporters with information about our projects and outputs via our newsletter. This includes personal data such as names, addresses, email addresses and phone numbers. Your data is held on either our secure server or encrypted in the cloud. Personal data linked to donations via our website is processed by Paypal (see below), while personal data linked to newsletter subscriptions is held on Mailchimp (see below).

CEOBS does not:

- sell nor buy any marketing lists;
- employ any cold calling techniques asking for donations;
- keep records longer than legally necessary.

Supporters, suppliers, press, funders, interested organisations and associates are strictly only contacted by phone or post if they have requested that we do so.

Financial data security

Online credit or debit card donations are processed through **Paypal**, via a secure transaction system using encryption. Every transaction is encrypted using SSL advanced encryption technology with an encryption key length of 168 bits (the highest level commercially available) and 3D-Secure secure protocols to verify users' bank details. You can find more information on how Paypal stores your data [here](#). Paypal's privacy and data collection policy is available [here](#).

CEOBS does not get access to any personal financial data during transactions: our records are limited to your name, address, email address and Paypal's unique transaction ID. This data is held

by Paypal and on our secure server. Should it ever be necessary to process personal data linked to financial transactions in hardcopy, it will be shredded before disposal.

Mailing list security

The database used for our newsletter is managed using **MailChimp** and includes an opt-in checkbox that **clearly states how your data is being used by CEOBS**. MailChimp is a marketing automation service provided by the Rocket Science Group, based in Atlanta, USA. Servers and offices are located in the United States. Although your information may be transferred to, stored, or processed in the United States, MailChimp participates in and is compliant with the EU-U.S. Privacy Shield Framework, which will qualify as one of the available cross-border transfer mechanisms (Art. 46 of the GDPR legislation).

Data collected by ceobs.org

CEOBS collects data to monitor and analyse traffic on our website and to improve the experience of visitors. The data necessary for this is held for 26 months and is collected by Google Analytics. We collect the bare minimum of data required, for example we do not collect data for advertising or remarketing purposes or share it with Google. Data used simply to track the number of visitors and their locations by Google Analytics does not require the storage of personally identifiable information.

Action in case of data security breach

Personal data breaches are defined as where:

- data is lost, destroyed, corrupted or disclosed;
- data is accessed by an unauthorised person, or passed on without proper authorisation;
- data is made unavailable and this unavailability has a significant negative effect on individuals.

In case of a security breach, CEOBS is committed to following the procedure described in the GDPR legislation, namely documenting all breaches, notifying the Information Commissioner's Office of a breach within 72 hours of becoming aware of it, and notifying and advising affected individuals in compliance with relevant legislation.

Data updates

CEOBS endeavours to keep the data we hold as up to date and accurate as possible. If any of your details change, or if you would like to know what information about you that we hold, please contact us using any of the methods below.

Supporters can opt in or out of CEOBS mailing lists and can unsubscribe themselves from mailing lists at any time by clicking on the unsubscribe link on our newsletter or on emails.

- replying to an email we've sent you;
- emailing us at contact@ceobs.org;
- writing to CEOBS, Data Management, Bridge 5 Mill, 22a Beswick Street, Manchester, UK. M4 7HR.