

Girls in Tech™

**DRAFT**

**GDPR**  
**Privacy Policy**

**JULY 21, 2020**

## **GIRLS IN TECH EUROPE / UK PRIVACY POLICY**

### **GDPR**

#### **1. INTRODUCTION**

- 1.1 This is the privacy policy of the EEA-based chapters (as listed in Annex II) of Girls in Tech (the “Policy”), which are referred to as the “Girls in Tech”, “us” or “we” throughout this Policy. Any reference to “Girls in Tech”, “we” or “us” is a reference to the chapter in your jurisdiction (each a “Chapter”). This Policy provides details of the ways in which we process personal data in line with our obligations under data protection law including the General Data Protection Regulation (No 2016/679) (“GDPR”).
  
- 1.2 For the purposes of GDPR, [Girls in Tech Inc.] is the ultimate controller of any personal data collected from you or otherwise for the purpose of conducting or developing our relationship with you. We are an educational non-profit for women in technology located in the [United States of America at 575 Market Street, 5th Floor, San Francisco, CA 94105, USA]. We have appointed a representative in the European Union, who can be contacted at: DLA Piper, Inc. France 27 Rue Laffitte, 75009 Paris, France +33 1 40 15 24 00

## **2. BACKGROUND AND PURPOSE**

- 2.1. The purpose of this Policy is to explain what personal data we process and how and why we process it. For the purposes of this Policy, personal data means any information relating to an identified or identifiable person. Please read this Policy carefully as it provides important information about how we use personal data and explains your legal rights.

In addition, this Policy outlines our duties and responsibilities regarding the protection of such personal data. The manner in which we process data will evolve over time and we will update this Policy from time to time to reflect changing practices and law. We will notify you of any changes, either the next time you visit a website or to the contact details we hold for you.

- 2.2 In order to meet our transparency obligations under data protection law, we will incorporate this Policy by reference into various points of data capture used by us (e.g. application forms etc.) and may provide additional information where relevant.

### 3. GIRLS IN TECH AS A DATA CONTROLLER

3.1 We will act as a data controller in respect of personal data provided to us by various individuals in connection with the operation and administration of Girls in Tech. Such individuals will generally include the following:

- a) members of the board;
- b) members of the advisory board;
- c) volunteers;
- d) subscribers/event attendees;
- e) corporate sponsors and partners; and
- f) website visitors.

We sometimes use third party providers to collect this information on our behalf such as Eventbrite, Google, Survey Gizmo and Survey Monkey.

3.2 The types of personal data are described in Annex I. In order for us to provide our services to you we require certain personal data from you. This personal data is processed by us for the following purposes:

#### PURPOSE OF PROCESSING

Administration purposes, including approval of new membership applications by the Chapter.

#### LAWFUL BASIS UNDER GDPR

Such processing is necessary for the performance of a contract between us and members.

Training, quality monitoring or evaluating the services we provide.

Such processing is necessary for the legitimate interests pursued by the Chapter of improving the quality of services we provide to users.

The organisation, promotion and running of events and fundraising.

Such processing is necessary: (a) in our legitimate interests as a non-profit in furthering our goals by running event and fundraisers, (b) for the performance of a contract between us and event attendee in accordance with the event terms and conditions; and (c) based on attendees' consent.

Maintaining contact details of subscriber, and communicating with them through various means including email, text message and online social media retargeting.

As necessary for the performance of the Chapter's legitimate interests as a non-profit and, where photographs or details are published, the consent of the relevant individuals.

Publishing and circulating a newsletter, website updates and other member communications, which may include publication of photographs or details of members and other individuals.

The consent of the relevant individuals.

Website services, including for troubleshooting, data analysis, and survey purposes.

We have a legitimate interest in operating a website and for related purposes.

Statistical information that cannot be related back to individuals to help us improve the services we offer.

We have a legitimate interest in operating a website and for related purposes.

Facilitating the sharing of CVs and other job posting services.

The performance of a contract between us and the individual who signs up for the job posting services.

#### 4. INDIVIDUAL DATA SUBJECT RIGHTS

4.1 Data protection law provides certain rights in favour of data subjects (the “**Data Subject Rights**”), including the right:

- a) of a data subject to receive detailed information on the processing (by virtue of the transparency obligations on the controller);
- b) of access to personal data;
- c) to rectify or erase personal data (right to be forgotten);
- d) to restrict processing;
- e) of data portability;
- f) to withdraw consent at any time, without affecting the lawfulness of processing based on consent before its withdrawal; and

g) to object to automated decision making, including profiling, and where we rely on its legitimate interests to process your personal data (for example, for marketing purposes).

4.2 You may make a request to us to exercise any of the Data Subject Rights by contacting the relevant Chapter (at the contact details listed in Annex II). Your request will be dealt with in accordance with data protection law.

## **5. DATA SECURITY AND DATA BREACH**

5.1 We have technical and organisational measures in place to protect personal data from unlawful or unauthorised destruction, loss, change, disclosure, acquisition or access. Personal data are held securely using a range of security measures including, as appropriate, IT measures such as encryption, and restricted access through approvals and passwords.

5.2 The GDPR obliges data controllers to notify the relevant data protection supervisory authority and affected data subjects in the case of certain types of personal data security breaches. Any data breaches identified in respect of personal data controlled by us will be dealt with in accordance with data protection law and our internal data breach procedure.

## **6. GIRLS IN TECH AND DATA PROCESSORS**

6.1 We will engage certain event, ticketing and surveying service providers (including Eventbrite, Google, Survey Gizmo and Survey Monkey) to perform certain services on our behalf which may involve the collection and processing of personal data.

To the extent that such processing is undertaken based on the instructions of us and gives rise to a data controller and data processor relationship, we will ensure that such relationship is governed by a contract which includes the data protection provisions prescribed by data protection law.

## **7. DISCLOSING PERSONAL DATA**

- 7.1 From time to time, we may disclose personal data to third parties, or allow third parties to access personal data which we process (for example where a law enforcement agency or regulatory authority submits a valid request for access to personal data).
- 7.2 We share personal data with Girls in Tech headquarters in the United States. Girls in Tech headquarters will send out newsletters and surveys to the global database when there is news, information and events relevant and applicable to all chapters and members.

## **8. DATA RETENTION**

- 8.1 We will keep personal data only for as long as the retention of such personal data is deemed necessary for the purposes for which that personal data are processed (as described in Section 3.2 of this Policy). The retention period depends on a number of factors including statutory limitation periods, consents provided by users and other legal requirements.



## 9. DATA TRANSFERS OUTSIDE THE EEA

- 9.1 In the event that we are required to transfer personal data to countries outside the European Economic Area we will ensure that such processing of your personal data is in compliance with data protection law. If the country is not recognised as adequate by the European Commission, we will either rely on the Privacy Shield Framework (if the recipient is certified) or enter into Model Contractual Clauses (as published by the European Commission). If you require more information on the means of transfer of your data or would like a copy of the relevant safeguards, please contact us at the details provided below.

## 10. COOKIES

- 10.1 Cookies are small text files that may be placed on your browser when you visit our website (the “**Site**”). Cookies are used primarily for administrative purposes, to improve your experience with our Site. For instance, when you return to the Site after logging in, cookies provide information to the Site, including personal data, so that the Site will remember who you are. Our Site uses cookies primarily to capture anonymous analytics used to improve our Site experience and performance. This includes compiling statistical information concerning, among other things, the frequency of use of our Site, the pages visited, and the length of each visit, as well as information about your computer, operating system, browser, language and country. We do not use cookies to store any personal data that could be read or understood by others.

10.2 Using the settings of your Internet browser, you can choose to have your computer warn you each time a cookie is being sent, or you can choose to turn off all cookies.

10.3. Consult your browser Help menu to learn the correct way to modify your cookies. If you choose to turn off cookies, you may not have access to certain features of our Site. You may at any time delete any cookies set by using the relevant option of your Internet browser or by deleting the cookies on your hard drive.

10.4 We use the following cookies where we have obtained consent:

<b>COOKIE DESCRIPTION</b>	<b>RETENTION PERIOD TYPE</b>	<b>DESCRIPTION</b>
<b>-gt</b> Cookie description: Used by Google Analytics to distinguish users and sessions. More info here: <a href="https://developers.google.com/analytics/devguides/collection/analyticsjs/cookie-usage">https://developers.google.com/analytics/devguides/collection/analyticsjs/cookie-usage</a>	For the duration of site usage (session).	Performance - Statistic cookies helps Girls in Tech to understand how visitors interact with websites by collecting and reporting information anonymously.
<b>_gat</b> Cookie description: Used by Google Analytics to distinguish users and sessions. More info here: <a href="https://developers.google.com/analytics/devguides/collection/analyticsjs/cookie-usage">https://developers.google.com/analytics/devguides/collection/analyticsjs/cookie-usage</a>	For the duration of site usage (session).	Performance - Statistic cookies helps Girls in Tech to understand how visitors interact with websites by collecting and reporting information anonymously

## 11. FURTHER INFORMATION/COMPLAINTS PROCEDURE

- 11.1 For further information about this Policy and/or the processing of your personal data by or on behalf of the Girls in Tech please contact the relevant chapter at the contact details listed in Annex II.
- 11.2 While you may make a complaint in respect of our compliance with data protection law to the relevant data protection supervisory authority in your jurisdiction, we request that you contact the relevant chapter (at the contact details listed below) in the first instance to give us the opportunity to address any concerns that you may have. A list of data protection supervisory authorities is available [here](#).

Date: [ ● ] 2020

## ANNEX I

### TYPES OF PERSONAL DATA

CATEGORIES OF DATA SUBJECT	TYPE OF PERSONAL DATA
<b>Volunteers</b>	Name, contact details including email and phone number.
<b>Board Members</b>	Name, address, contact details including email and phone number.
<b>Advisory Board Members</b>	Name, contact details including email and phone number.
<b>Event Participant</b>	Name, address and email.
<b>Corporate Sponsors and Partners</b>	Name and email.
<b>Website Visitors</b>	Domain; IP address; date, time and duration of your visit; browser type; operating system; page visits; other information about your computer or device; and internet traffic. Any Personal Data provided by users using the email addresses provided on our website.

## ANNEX II

### CHAPTERS

CHAPTER	CONTACT EMAIL	WEBSITE
Dublin	<a href="mailto:dublin@girlsintech.org">dublin@girlsintech.org</a>	<a href="https://dublin.girlsintech.org/">https://dublin.girlsintech.org/</a>
Gibraltar	<a href="mailto:gibraltar@girlsintech.org">gibraltar@girlsintech.org</a>	<a href="https://gibraltar.girlsintech.org/">https://gibraltar.girlsintech.org/</a>
London	<a href="mailto:london@girlsintech.org">london@girlsintech.org</a>	<a href="https://london.girlsintech.org/">https://london.girlsintech.org/</a>
Paris	<a href="mailto:france@girlsintech.org">france@girlsintech.org</a>	<a href="https://france.girlsintech.org/">https://france.girlsintech.org/</a>
Poland	<a href="mailto:poland@girlsintech.org">poland@girlsintech.org</a>	<a href="https://poland.girlsintech.org/">https://poland.girlsintech.org/</a>
Reunion	<a href="mailto:reunion@girlsintech.org">reunion@girlsintech.org</a>	<a href="https://reunion.girlsintech.org/">https://reunion.girlsintech.org/</a>
Romania	<a href="mailto:romania@girlsintech.org">romania@girlsintech.org</a>	<a href="https://romania.girlsintech.org/">https://romania.girlsintech.org/</a>
Spain	<a href="mailto:spain@girlsintech.org">spain@girlsintech.org</a>	<a href="https://spain.girlsintech.org/">https://spain.girlsintech.org/</a>
Sweden	<a href="mailto:sweden@girlsintech.org">sweden@girlsintech.org</a>	<a href="https://sweden.girlsintech.org/">https://sweden.girlsintech.org/</a>
Switzerland	<a href="mailto:switzerland@girlsintech.org">switzerland@girlsintech.org</a>	<a href="https://switzerland.girlsintech.org/">https://switzerland.girlsintech.org/</a>