

International Centre for Counter-Terrorism Data Protections & Privacy Policy

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1 – Overview

The International Centre for Counter-Terrorism is committed to protect the privacy and data of its users, and will handle any information collected on the website (icct.nl) according to this privacy policy.

Given the increasing relevance in the international and European legal context of enhancing protections for such data, this Policy provides a regulatory framework for The International Centre for Counter-Terrorism for the processing of Non-sensitive data. Our Policy respects the scheme and provisions set in place by the EU [Regulation 2016/679](#) on the protection of natural persons with regard to the processing of personal data and on the free movement of such data.

ICCT is therefore committed to applying the appropriate safeguards for the handling of data of natural persons.

1.1 Scope

ICCT collects, stores and handles the data of natural persons through our website and our events. The ICCT only processes **Non-Sensitive Data**, including:

- First and last name
- Email Address
- Institutional Affiliation (when registering for our events only)
- IP addresses and general location determined by your browser
- Images of persons

This Policy therefore applies to any processing of aforementioned data by ICCT, and applies to any processing of personal data belonging to natural persons and legal entities hereinafter defined as Data subjects.

This policy applies to personal data of ICCT personnel and any other entity interacting with our website and content.

1.2 Definitions

This Privacy Policy upholds the following definitions:

Personal Data: any information that relates to an identified or identifiable living individual, and different pieces of information, which, collected together can lead to the identification of a particular person

Data Subjects: each natural person, identified or identifiable, which the organisation processes the personal data of , including individuals under special service contract, consultants, interns, applicants to an ICCT position, and any other contracting party.

Processing: In accordance with its relevant legal basis, this Privacy Policy defines 'processing' as:

- Receiving documentation containing personal data (ex. job applications)
- Sending and receiving emails.
- Using personal data for dissemination and communication purposes (ex. sending out newsletters or promotional materials via email)
- Storing of personal data, such as readers or employees information.

Controller: The International Centre for Counter-Terrorism is defined as the Controller designed to assess the purpose of processing personal data and is responsible for its lawful and proportionate storage and retention.

Data Retention: Personal data must be erased when the data are no longer necessary to fulfil the purpose for which it was collected. The ICCT therefore determines retention periods in accordance with the relevant legal requirements.

2 – Purpose

Personal Data shall be collected for specified, explicit and legitimate purposes, and not further processed or shared by any condition beyond the ones set by this Privacy Policy.

2.1 Lawfulness

The processing of data is lawful upon fulfilment of the below conditions:

- Data subjects have given consent (explicit or implicit) to the processing.
- It is necessary for the ICCT to carry out its activities.
- It is necessary for the fulfilment of a contract obligations the data subject has entered into.
- It is necessary for a legitimate purpose defined by the Controller.

2.2 Purpose

The processing of data is necessary for the achievement of ICCT's legitimate interests and shall at all times respect the fundamental rights and freedoms of data subjects.

The collection of personal data is relative to the aforementioned legitimate purpose. Any other use of personal data will be made explicit and pending authorisation by the Data subject. The processing of personal data is strictly related to ICCT's activities, and paramount to (i) sending newsletters, (ii) contacting with necessary updates on our services, (iii) contacting individuals in response to open vacancies and (iv) acquiring analytics for our website.

2.3 Limitations

The processing of personal data shall be regulated and limited by the rights of Data subjects, including:

- Right to information concerning the purpose of the processing, the recipient of personal data, and the anticipated period for which the personal data will be retained.
- Right to access personal data from the Controller, and information on how the personal data is being processed
- Right to rectification and erasure of personal data by the Controller without undue delays, including completion of supplementary data.
- Right to withdraw consent for the processing of personal data in the context of both internal or external disputes.
- Right to object the processing of personal data on personal grounds, unless the controller can demonstrate compelling legitimate grounds which override the interest.

2.4 Accountability

The Controller shall be responsible for the processing of data and if necessary be able to demonstrate compliance with the relevant norms.

In the event of loss of personal data or any loss of confidentiality, the ICCT will take all the necessary steps and precautions to promptly inform the Data Subject(s) affected.

Information and questions regarding personal data breaches will be communicated from and directed towards: info@icct.nl

3 - Processing

The processing of personal data shall be at all times compliant with the provisions set forth by this ICCT Policy.

3.1 Collection of Data

The specific purposes for which personal data are processed shall be explicit and legitimate at all times. The lawful processing of personal data shall occur on the basis of consent or other legitimate basis.

The existence of legitimate interest requires careful assessment and shall be at all times compliant with the codes of conduct set by the relevant legal basis.

3.2 Duties

While processing personal data, the Controller and the relevant staff should implement appropriate safeguards and appropriate measures to ensure that the processing is performed in accordance with the provisions of this Policy.

The ICCT shall maintain a record of its processing activities, to ensuring transparency and compliance at all time while processing personal data.

The Controller shall in the performance of its task have due regard to the risks associated with processing personal data by taking into account the nature, circumstance and purpose to collect and process data.

3.3 Storage

All the data processed by ICCT is stored by TransIP.nl data-centre in Amsterdam, which cannot access the data themselves and serves according to Dutch security standards.

3.4 Security

ICCT considers personal data as Confidential and protects them as such. This entails limiting access to personal data to the extent that they are not necessary to carry out ICCT related tasks.

Personal data will be disposed in a way that ensures protection of the rights and privacy of Data Subjects. Depending on the sensitivity of the data, this might entail alternative ways to dispose of documents.

The ICCT is also responsible for protecting data and to take appropriate measures to prevent misuse, loss, disclosure, modification or any unauthorised use of personal data.

3.5 Transfer

Some personal data may not be considered of sensitive nature to the discretion of the Controller, based on relevant provisions, and be shared with other institutions and partners.

ICCT may disclose personal data to third parties pursuant the fulfilment of its relevant tasks and obligations. In the occasion of transfer of data

ICCT may be required to disclose personal data to comply with other legal obligations and/or for the execution of official agreements.

4 - Disclaimer

This Private Policy provides a summary of personal data protection in accordance to the provisions of the relevant Regulation and in accordance with any national or international law on data protection.

Nothing in this Policy shall be considered to be legally binding outside the scope of activities of the International Centre for Counter-Terrorism, and shall in no way or form be held as a derogation from the obligations of ICCT.

ICCT is committed to ensuring that privacy is protected and will endeavour to use any personal data in accordance with the provisions set by this Policy.

Any and all changes to this Policy will be made public and communicated to all Data subjects to ensure their consent.

For any questions in regard to the ICCT Privacy Policy, you can contact us at info@icct.nl