

**DUBLIN**

Front Line Defenders – Head Office  
Second Floor, Grattan House  
Temple Road, Blackrock  
Co. Dublin, A94 FA39, Ireland

info@frontlinedefenders.org  
www.frontlinedefenders.org

phone +353 1 212 3750  
fax +353 1 212 1001

**BRUSSELS**

Front Line Defenders – EU Office  
Square Marie-Louise 72  
1000 Brussels  
Belgium

euoffice@frontlinedefenders.org  
www.frontlinedefenders.org

phone +32 2 230 9383  
fax +32 2 230 0028

## Front Line Defenders Privacy and Digital Security Statement on personal data of Human Rights Defenders

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Digital Security and Privacy are governing principles at Front Line Defenders. The risks from various aggressors (both physical and digital) to human rights defenders and organisations (HRD/Os) are growing worldwide and, as Front Line Defenders is communicating and storing sensitive information about those at risk, the organisation is applying the highest digital protection standards both internally and with third parties. This lies at the core of the organisation's value of integrity, its central focus on the safety of HRDs and its systems and procedures. Fostering a culture of security and ongoing learning of best practices, are priorities of the organisation.

Front Line Defenders is committed to protecting the privacy and personal data of HRD/Os it works with. Front Line Defenders endeavours to protect all personal data through compliance with General Data Protection Regulation (GDPR), the Irish Data Protection Act 1988, the Irish Electronic Communications Regulations 2003, the UK Data Protection Act 1998 and the UK Electronic Communications (EC Directive) Regulations 2003.

As such, Front Line Defenders respects the data protection rights of HRD/Os. All personal data is stored on the organisation's secure encrypted computerised database. Only Front Line Defenders staff has access to the data and additional access restrictions are in place for highly sensitive information. If, to serve its mandate to protect HRD/Os, Front Line Defenders is to share personal data with third parties, it will request the HRD's consent in advance. Front Line Defenders has a comprehensive IT Security Policy and maintains the highest standards of security in its IT and communication systems and procedures.

### What data does FLD collect?

Front Line Defenders collects different data depending on the human rights defender's interaction with Front Line Defenders (e.g subject of an urgent appeal or statement, a grant recipient, training participant, rest & respite participant, Dublin Platform participant, Award recipient, etc.).

Front Line Defenders collects the following data: personal identification information (name, email address, phone number), gender where applicable, nationality where applicable, human rights activities, organisation, risks faced by the HRD and other information relevant to their activities as a human rights defender, bank details where applicable and ID information (where applicable for visas), vaccination information (where applicable for travel/trainings), etc.

#### Front Line Defenders Board of Directors

Denis O'Brien, Jim Conway, Maria Mulcahy, Kieran Mulvey, Mary Jane Real (Philippines), David Sykes, Arnold Tsunga (Zimbabwe), Verónica Vidal (Uruguay)

#### Front Line Defenders International Advisory Council

James L. Cavallaro, Maryam Elahi, Michel Forst, Hina Jilani, Mary Lawlor

#### Front Line, The International Foundation for the Protection of Human Rights

Defenders trading as Front Line Defenders, is registered in Ireland as a company limited by guarantee and not having a share capital. Registered Office: Second Floor, Grattan House, Temple Road, Blackrock, Co. Dublin, A94 FA39, Ireland.

Company No. 593190; Registered Charity No. 20204494; CHY 22404

## **How FLD gathers HRD personal data**

Front Line Defenders collects data directly from human rights defenders primarily by secure messaging, phone and email and indirectly through referrals from other contacts and organisations.

The personal data of anyone who submits personal and sensitive information to Front Line Defenders is protected by a secure, encrypted online and offline system. Front Line Defenders has a comprehensive IT Security Policy and maintains the highest standards of security in its IT and communication systems and procedures.

## **How FLD stores HRD personal data**

All personal data is stored on the organisation's secure encrypted computerised database which is designed to ensure that any risk of loss, misuse, unauthorised access, disclosure, alteration or destruction of personal information is kept to an absolute minimum.

## **How FLD uses HRD personal data**

Front Line Defenders uses information held about HRDs to provide HRDs with protection support through programmes that they request from the organisation or that which may interest them, where they have consented to be contacted for such purposes.

## **Who has access to HRD personal data**

The first priority for Front Line Defenders when receiving, storing and sharing HRD data is always on the safety of HRDs. Front Line Defenders has a comprehensive IT Security Policy and maintains the highest standards of security in its IT and communication systems and procedures.

All Front Line Defenders staff who have access to HRD personal data receive induction and training in digital security and commit to the IT Security Policy of the organisation. Front Line Defenders has additional security measures and access restrictions in place for highly sensitive information related to particular human rights defenders.

## **Who does FLD share HRD personal data with?**

Front Line Defenders will request the HRD's consent before sharing their personal data with another organisation, journalists or other stakeholders in the human rights sector.

FLD auditors may process a HRD's financial information for the purposes of conducting an annual audit but that information does not leave the office and/or has sensitive details redacted.

## **The legal basis on which FLD collects and uses HRDs' personal data**

When it is necessary for the performance of a contract;  
When it is necessary for us to comply with a legal obligation;  
Where the personal data is gathered from the HRD, through a form or other form of communication we process the personal information on the basis of consent.

## **Retention of Personal Data**

Front Line Defenders will retain Personal Data only for as long as is necessary for the purposes set out in this Privacy statement. The organisation will retain and use Personal Data to the extent necessary to comply with its legal obligations (for example, if it is required to retain data to comply with applicable laws), resolve disputes, and enforce our legal agreements and policies.

## **For Human Rights Defenders: What are your data protection rights?**

### **The right to access and the right to data portability**

Should you wish to receive a copy of your personal information retained by Front Line Defenders, the organisation will facilitate such requests upon full confirmation of the identity of the person inquiring. Front Line Defenders will respond within 30 calendar days.

### **The right to have your personal data corrected or erased**

All individuals who share personal data with Front Line Defenders have the right to have their personal data corrected, if inaccurate, or erased from our records. Front Line Defenders will respond within 30 calendar days.

### **The right to restrict processing**

You have the right to request that Front Line Defenders restricts the processing of your personal data, under certain conditions (need to add more detail/an example).

### **The right to object to processing**

You have the right to object to Front Line Defenders processing of your personal data, under certain conditions (need to add more detail/ an example). Enquiries should be directed to the Data Officer in writing via email ([dataprotection@frontlinedefenders.org](mailto:dataprotection@frontlinedefenders.org)) or by post to Front Line Defenders, Grattan House, Temple Road, Blackrock, Co. Dublin.

## **Sensitive Information**

Grant applications and case information may contain sensitive information. FLD will process this data for the sole purpose of assessing the grant request and supporting the case of the HRD, in the frame of FLD's privacy policy. In some cases, vaccination information is requested for the purpose of planning travel of HRDs and planning trainings. FLD may process sensitive data in order to fulfill the goals and guidelines of FLD according to its privacy policy. All sensitive information is treated as confidential and will only be shared internally where there is a specific and legitimate purpose to do so. There exists appropriate physical, technical, and organisational security measures designed to secure this data.

## **How to contact Front Line Defenders**

If you have any questions about the Front Line Defenders privacy policy, the data the organisation stores on you, or if you would like to exercise one of your data protection rights, please do not hesitate to contact the organisation at: [dataprotection@frontlinedefenders.org](mailto:dataprotection@frontlinedefenders.org)

## **How to contact the appropriate authorities**

Should you wish to report a complaint or if you feel that Front Line Defenders has not addressed your concern in a satisfactory manner, you may contact the Data Protection Commission of Ireland; [info@dataprotection.ie](mailto:info@dataprotection.ie)