

## Privacy Policy

Last reviewed: 12th September 2023

### 1. Introduction

Centrepoint treats the handling of personal data with the highest importance.

The EU General Data Protection Regulation (GDPR) came into force on 25th May 2018 and Centrepoint developed a Privacy Policy and supporting processes to ensure compliance. On 1st September 2023, the new Data Protection Act (DPA) and new Data Protection Ordinance (DPO) came into force in Switzerland.

The Swiss Ordinance takes into account the EU GDPR on which the previous Centrepoint Privacy Policy was based. In order to be compliant with the Swiss Ordinance, the Privacy Policy has been reviewed and where necessary updated.

The Privacy Policy explains how Centrepoint complies with the applicable legislation in respect of personal data.

### 2. Member Data

#### a) Collection

The following data are collected during the membership application process via an online form on the Centrepoint website:

##### Mandatory data

- First name
- Last name
- Email address
- Postal address
- Nationality
- First language
- How the applicant wants to receive the Horizon magazine
- How the applicant found out about Centrepoint
- Applicant's desire to volunteer
- Applicant's consent to receive post and emails from Centrepoint
- Applicant's confirmation that they have read and will abide by Centrepoint's Privacy Policy and Membership Policy
- Confirmation that the applicant is over 18 years of age

##### Optional data

- Title
- Gender
- Telephone number
- Date of birth

While a Centrepoint member, the following data may also be collected:

- the dates during and role(s) in which a member volunteers at Centrepoint
- a member's participation in Centrepoint activity groups, conversation groups or other events

Whenever anyone accesses the Centrepoint website or Centrepoint's social media pages the following information is recorded:

- IP address
- Date and time
- Browser request

Cookie settings are also collected if applicable (see Centrepoint's separate Cookie Usage Policy for details).

In addition to personal data, with their consent photographs and videos of members may be taken (see Centrepoint's separate Photography Policy for details).

### **b) Usage**

The data collected by Centrepoint is used to:

- process the initial membership application and subsequent membership renewal
- process payments to the member (e.g. reimbursement of expenses, refunds)
- communicate with the member regarding activities, events and volunteering opportunities (note the member can choose to opt out of receiving those communications that are not required for the effective processing of their membership)
- assist Centrepoint in ensuring it provides an attractive offer to its members through the analysis of collated member data (e.g. Google Analytics, a third-party application)

### **c) Storage**

Member data provided during the membership application process is automatically stored within an individual member record on Centrepoint's membership database which is integrated with Centrepoint's website. The member record also stores volunteering data if the member volunteers at Centrepoint.

Documents containing member data (e.g. participant lists) are also stored on Centrepoint's document storage system, Dropbox. Any Photographs are stored on either Dropbox or Centrepoint's SmugMug account.

By submitting personal data to Centrepoint, the member consents to the transfer and storage of that information for processing. The member accepts the terms of use during the application process.

All personal data is stored on third-party secure servers, some of which are located outside Switzerland. The companies owning these servers are under the same data privacy obligations as Centrepoint.

When a member leaves Centrepoint their individual member record containing their personal data is archived within the membership database and eventually deleted. Centrepoint only retains personal data for as long as necessary to fulfil the purposes for which it was collected, including for the purposes of satisfying any legal, accounting, or reporting requirements. In some circumstances Centrepoint may anonymise personal data for research or statistical purposes in which case we may use this information indefinitely.

### **d) Access and Security**

Members can view and edit their personal data by accessing their "personal profile" via the Centrepoint website using a unique password created by themselves (not visible to any other Centrepoint member or any third party).

A member can at any time choose to make any data that they submitted during the application process visible to other Centrepoint members by changing their privacy



settings within their “personal profile”. The default setting is that no data is visible to others and so the member must proactively choose to make their data visible.

Some Centrepoint volunteers will have access to a member’s personal data if necessary to provide membership services and support. All Centrepoint volunteers are required to sign a confidentiality agreement gaining their consent to protect personal data and abide by Centrepoint’s Email Usage Policy.

Centrepoint does not share member data with any third-party individuals or organisations unless there is a legal obligation to do so.

Centrepoint’s website and social media pages use SSL (secure socket layer) combined with the highest encryption level supported by the member’s browser.

### **3. Non-Member Data Collection, Usage and Storage**

Non-members may be requested to provide their names and email addresses either at Centrepoint events or at events organised by other organisations at which Centrepoint is participating. Anyone who provides such information is implicitly giving their consent for Centrepoint to contact them.

The data may be used to contact individuals to raise their awareness of Centrepoint and its activities for a period of up to two years.

The data will be held securely in documents stored in Centrepoint’s document storage system, Dropbox and will be archived after two years.

### **4. Your Rights**

You have the right at any time concerning your personal data to:

- Request what personal data is held by Centrepoint
- Request the correction of incorrect personal data
- Request the deletion of data stored by Centrepoint
- Request a restriction or object to the processing of your personal data
- Request back the data you supplied to Centrepoint.

If you have given your consent, you may withdraw this consent at any time with effect from that point.

Please note that legal restrictions may apply to the exertion of your rights, e.g. if Centrepoint has to comply with certain legal retention obligations.

### **5. Policy Amendments**

We reserve the right to amend this Privacy Policy at any time without prior communication so that it always meets the current legal requirements and in order to incorporate any changes to our processes or services.

Any updates to the Privacy Policy will be published on the Centrepoint website or can be obtained from the Board Secretary (secretary@centrepoint.ch). Significant changes to the Privacy Policy will be communicated to members after the updated Policy has been made available on the Centrepoint website.



## **6. Further Information**

For further information regarding Centrepoint's use of personal data please contact the Board Secretary ([secretary@centrepoint.ch](mailto:secretary@centrepoint.ch)), the accountable person for data privacy within Centrepoint.

If necessary, the Board Secretary will liaise with other Board Members and/or Centrepoint Volunteers to provide a response within 30 days of receiving any personal data request.