

# Data Privacy Policy of American Councils for International Education

This policy sets out the most important information regarding the processing of your personal data by the American Councils for International Education (American Councils) and applies to all initiatives conducted by the American Council as part of its statutory activities (including website and newsletter).

#### **Adminstrator of Personal Data**

The administrator of personal data is the American Councils for International Education Foundation based in Warsaw at al. Niepodległości 165/4, identified by the NIP number 701-05-67-002, REGON 364197199 and registered in the National Court Register under the number 0000612180. Contact pl@americancouncils.org or 530 097 031.

# Website (Service)

All data collected by us, are collected to the extent that it is necessary for the efficient management of our website, and used only for this purpose. During the visit on our website, the user's data are automatically collected, such as: IP address (anonymized), browser type, operating system type and the domain name from which the user enters our website, the URL of the previously visited website. IP addresses in server log files are anonymized and can not be assigned to a specific person. We use this data only to evaluate the operation and security of our website and to optimize our offer to generate statistics of visits to our website (using Google Analytics tool), which helps us to efficiently administer the website, provide high quality content, prevent errors in the operation service.

Users can browse our site anonymously, we do not require registration, we do not use any tools to identify Users. The data collected is not associated with specific people browsing our site.

We do not transfer any data collected to other entities, we do not disclose them to anyone, unless such requests are requested by the state organs on the basis of universally binding law (eg in connection with the suspicion of committing a crime).

#### Newsletter



Providing contact details to receive the newsletter is voluntary. Contact details (e-mail address) are processed by the American Councils only for the purpose of regularly sending the ordered newsletter, based on the consent, i.e. art. 6 par. 1 point "A" of the Regulation (EU) 2016/679 of the European Parliament and of the Council of April 27, 2016 (GDPR). Subscribers to the newsletter have the right to access their data, request rectification, deletion, processing restrictions, the right to data transfer, the right to object, the right to withdraw consent at any time without affecting the legality of processing, which was made on the basis of consent before its withdrawal; as well as the right to file a complaint with EDPS in the event that it considers that the processing of personal data violates the provisions of the GDPR.

The data is stored until the consent is withdrawn.

We do not make automatic entries to our mailing base, we do not use profiling. Personal data of subscribers is not generally available to recipients of data. We use the services of technical service providers who can handle the technical infrastructure we need to send the newsletter. Personal data is not transferred to third countries. Your personal data will be made available only if such an obligation will result from the generally applicable provisions of law, such as decisions of law enforcement agencies, arrest warrants, court verdicts, etc.

American Councils provides subscribers the opportunity to delete data at any time without giving a reason. In order to delete your data from the contact database, simply send an email to the following address: <a href="mailto:pl@americancouncils.org">pl@americancouncils.org</a>. In order to unsubscribe from the newsletter, please click the opt-out link in the newsletter or send an e-mail to the following address: <a href="mailto:pl@americancouncils.org">pl@americancouncils.org</a>.

### Policy regarding cookies files

Our website does not automatically collect any information except for information contained in text files commonly referred to as cookies. They are stored in the Service User's device. Usually they contain the name of the website they come from, time of their storage on the User's device and number. Cookies are used to adapt the content of the Website to the preferences of the User and to optimize the use of the Website; creating statistics that help to understand how Website Users use websites, which allows improving their structure and content - to this end we use the Google Analytics tool provided by Google Inc.

The entity that places cookies on the Website User's device and who obtains access to them is the Website operator and the server administrator. Cookies are not used by us to obtain any data identifying users of our website or tracking their navigation. Remember that you can block and limit the installation of cookies using the settings of your browser or using one of many available (free) solutions (eg Ghosters).

Campaigns, actions and other initiatives run by the American Councils



In our activity, we contact public people, media representatives and collect personal data such as: name, surname, position, e-mail address, telephone number. We collect data from our donors, such as name, email address, telephone number and details of people contacting us (name, surname, email address, telephone number). The basis for data processing is the legitimate interest of American Councils - the implementation of its statutory objectives for the social good, information about social activities. If we are in possession of personal data, their source is consent or information available to the public. Every person whose personal data is processed by the American Councils has the following rights:

- the right to be informed and to request access to personal data processed by us;
- the right to request correction or update of personal data if it is inaccurate or incomplete;
- the right to request the deletion of personal data;
- the right to demand that we temporarily or permanently process all or part of your personal data;
- the right to object, at any time, to the processing of personal data by us, the right to transfer data
- the right to request electronic copy of personal data or to transfer it for use by third parties; and
- the right to refuse to be the subject of automatically made decisions
- the right not to be subject to decisions based solely on automatic decision making, including profiling, if a decision may cause legal effects for the user or have a similar effect.
- the right to withdraw consent at any time without affecting the lawfulness of the processing which was carried out on the basis of consent before its withdrawal;
- the right to file a complaint to the EDPS if it considers that the processing of personal data violates the provisions.

The data is retained until your consent is withdrawn or effective opposition to data processing is filed in cases where the legal basis for data processing is the legitimate interest of the American Councils. The data processing period may be extended if the processing is necessary to establish and assert any claims or defend against them, and after that time only if and to the extent required by law. After the end of the processing period, the data is irreversibly deleted or anonymized.

We do not make automatic entries into our databases, we do not use profiling. Data processed by the American Councils is not transferred to third countries. As a rule, these personal data are not shared with other entities. We use the services of technical service providers who can handle the technical infrastructure we need to send a newsletter or service American Councils campaigns / initiatives.

Your personal data will only be made available if such an obligation will arise from generally applicable law, such as law enforcement decisions, arrest warrants, court verdicts, etc. The American Councils provide the option of deleting data at any time without giving any reason.



In order to delete your data from the contact database, simply send an e-mail to the following address: pl@americancouncils.org.

## The scope and change of the privacy policy of our service

The described privacy protection rules apply only to our website. We are not responsible for the privacy policy of other websites to which links are on our website. We also reserve the right to change the above privacy policy by publishing its new version on our website. We will be informing our users visibly about the changes.

If you have additional questions regarding privacy protection, please contact us at: <a href="mailto:pl@americancouncils.org">pl@americancouncils.org</a>. All data that users of our site or subscribers of the newsletter or other persons communicate with us will only be used to provide a possible answer.

This policy will enter into force on May 25, 2018.