

# Transparency International EU

The global coalition against corruption

## Privacy

### WE RESPECT YOUR PRIVACY

Transparency International EU is committed to ensuring the privacy of all our users. The Transparency International EU website (<https://transparency.eu>), including all information and materials contained on it is managed by:

Transparency International Liaison Office of the European Union AISBL,  
Rue du Commerce 31,  
1000 Brussels, Belgium.  
[brussels@transparency.org](mailto:brussels@transparency.org)

This Privacy Policy governs all pages on the Transparency International EU website, <https://transparency.eu>. It does not apply to pages hosted by other organisations, including the websites of the Transparency International Secretariat, Transparency International National Chapters or related organisations or third party sites. The Transparency International EU website may be linked to the websites of such other parties but those other sites may have their own privacy policy, which applies to them.

The Transparency International EU website may be used without entering personal information. Different rules may apply to certain services on the Transparency International EU website, however, and are explained separately below. We collect personal information from you (e.g. name, address, email address, telephone number, etc.) in accordance with the provisions of Belgian data protection statutes. Information is considered personal, if it can be associated exclusively to a specific natural person. The legal framework for data protection may be found in the the Data Protection Directive 95/46/EC, the Belgian Act of 08 December 1992 on the protection of privacy in relation to the processing of personal data and its implementing decrees, and from 25 May 2018 in its successor legislation, the General Data Protection Regulation (and any Belgian act and/or decree implementing it). The provisions below serve to provide information as to the manner, extent and purpose for collecting, using and processing personal information by the provider.

Please be aware that data transfer via the internet is subject to security risks and, therefore, complete protection against third-party access to transferred data cannot be ensured.

### COOKIES

The Transparency International EU website makes use of so-called cookies in order to recognise repeat use of the Transparency International EU website by the same user/internet connection

subscriber. Cookies are small text files that your internet browser downloads and stores on your computer. They are used to improve the Transparency International EU website and services. In most cases these are so-called “session cookies” that are deleted once you leave the Transparency International EU website.

To an extent, however, these cookies also pass along information used to automatically recognise you. Recognition occurs through an IP address saved to the cookies. The information thereby obtained is used to improve our services and to expedite your access to the Transparency International EU website.

You can prevent cookies from being installed by adjusting the settings on your browser software accordingly. You should be aware, however, that by doing so you may not be able to make full use of all the functions of the Transparency International EU website.

## **SERVER DATA**

For technical reasons, data such as the following, which your internet browser transmits to us or to our web space provider (so called server log files), is collected: – type and version of the browser you use – operating system – websites that linked you to our site (referrer URL) – websites that you visit – date and time of your visit – your Internet Protocol (IP) address. This anonymous data is stored separately from any personal information you may have provided, thereby making it impossible to connect it to any particular person. The data is used for statistical purposes in order to improve the Transparency International EU website and services.

## **CONTACTING US**

On the Transparency International EU website we offer you the opportunity to contact us, either by email and/or by using a contact form. In such event, information provided by the user is stored for the purpose of facilitating communications with the user. No data is transferred to third parties. Nor is any of this information matched to any information that may be collected by other components of the Transparency International EU website.

## **USE OF GOOGLE ANALYTICS WITH ANONYMISATION**

The Transparency International EU website uses Google Analytics, a web analysis service from Google Inc., 1600 Amphitheatre Parkway, Mountain View, CA 94043 USA, hereinafter referred to as “Google“. Google Analytics employs so-called “cookies“, text files that are stored to your computer in order to facilitate an analysis of your use of the site.

The information generated by these cookies, such as time, place and frequency of your visits to our site, including your IP address, is transmitted to Google’s location in the USA and stored there.

We use Google Analytics with an IP anonymisation feature on the Transparency International EU website. In doing so, Google abbreviates and thereby anonymises your IP address before transferring it from member states of the European Union or signatory states to the Agreement on the European Economic Area.

Google will use this information to evaluate your usage of our site, to compile reports on website activity for us, and to provide other services related to website and internet usage. Google may also transfer this information to third parties, if this is required by law or to the extent this data is

processed by third parties on Google's behalf.

Google states that it will in never associate your IP address with other data held by Google. You can prevent cookies from being installed by adjusting the settings on your browser software accordingly. You should be aware, however, that by doing so you may not be able to make full use of all the functions of the Transparency International EU website.

Google also offers a disabling option for the most common browsers, thus providing you with greater control over the data which is collected and processed by Google. If you enable this option, no information regarding your website visit is transmitted to Google Analytics. However, the activation does not prevent the transmission of information to us or to any other web analytics services we may use. For more information about the disabling option provided by Google, and how to enable this option, visit <https://tools.google.com/dlpage/gaoptout?hl=en>.

## **USE OF GOOGLE MAPS**

We use the "Google Maps" component of Google Inc., 1600 Amphitheatre Parkway, Mountain View, CA 94043 USA, hereinafter "Google."

Google sets a cookie in order to process the user configuration and data when the page with the integrated "Google Maps" component is displayed. As a general rule, this cookie is not deleted by closing the browser, but rather expires after a certain time, as long as it is not previously manually deleted by you.

If you do not agree with this processing of your data, you may choose to deactivate the "Google Maps" service and thereby prevent the transfer of data to Google. To do this, you must deactivate the Java Script function in your browser. However, we would like to point out that in this case you will not be able to use "Google Maps" or at least only to a limited extent.

The use of "Google Maps" and the information obtained through "Google Maps" is according to Google's Terms of Use

<https://policies.google.com/terms>

as well as the additional Terms and Conditions for "Google Maps"

[https://www.google.com/help/terms\\_maps.html](https://www.google.com/help/terms_maps.html).

## **USE OF GOOGLE DRIVE**

We use the "Google Drive" component of Google Inc., 1600 Amphitheatre Parkway, Mountain View, CA 94043 USA, hereinafter "Google."

Google sets a cookie in order to process the user configuration and data when the page with the integrated "Google Drive" component is displayed. As a general rule, this cookie is not deleted by closing the browser, but rather expires after a certain time, as long as it is not previously manually deleted by you.

If you do not agree with this processing of your data, you may choose to deactivate the "Google Drive" service and thereby prevent the transfer of data to Google. To do this, you must deactivate the Java Script function in your browser. However, we would like to point out that in this case you

will not be able to use “Google Drive” or at least only to a limited extent.

The use of “Google Drive” and the information obtained through “Google Drive” is according to Google’s Terms of Use

<https://policies.google.com/terms>

as well as the additional Terms and Conditions for “Google Drive”

<https://www.google.com/drive/terms-of-service/>

## **USE OF FACEBOOK COMPONENTS**

The Transparency International EU website employs components provided by facebook.com. Facebook is a service of Facebook Inc., 1601 S. California Ave, Palo Alto, CA 94304, USA.

Each time the Transparency International EU website receives an access request equipped with a Facebook component, the component prompts your browser to download an image of this Facebook component. Through this process, Facebook is informed precisely which page of the Transparency International EU website is being visited.

When you access our site while logged into Facebook, Facebook uses information gathered by this component to identify the precise page you are viewing and associates this information to your personal account on Facebook. Whenever you click on the “Like“ button, for example, or enter a comment, this information is transmitted to your personal account on Facebook and stored there. In addition, Facebook is informed of your visit to the Transparency International EU website. This occurs regardless of whether you click on a component or not.

If you wish to prevent the transfer to and storage of data by Facebook about you and your interaction with the Transparency International EU website, you must first log out of Facebook before visiting the Transparency International EU website. The data protection policies of Facebook provide additional information, in particular about the collection and use of data by Facebook, your rights in this regard as well as the options available to you for protecting your privacy: <https://facebook.com/about/privacy/>

You can find an overview of Facebook plugins at <https://developers.facebook.com/docs/plugins/>

## **USE OF TWITTER RECOMMENDATION COMPONENTS**

The Transparency International EU website employs components provided by Twitter. Twitter is a service of Twitter Inc., 795 Folsom St., Suite 600, San Francisco, CA 94107, USA.

Each time the Transparency International EU website receives an access request equipped with a Twitter component, the component prompts your browser to download an image of this component from Twitter. Through this process, Twitter is informed precisely which page of the Transparency International EU website is being visited. We have no control over the data that Twitter collects in the process, or over the extent of the data that Twitter collects. To the best of our knowledge, Twitter collects the URL of each website accessed as well as the IP address of the user, but does so solely for the purpose of displaying Twitter components. Additional information may be obtained from the Twitter data privacy policy, at: <http://twitter.com/privacy>.

You may change your data privacy settings in your account settings, at <http://twitter.com/account/settings>.

## **USE OF YOUTUBE COMPONENTS WITH ENHANCED DATA PROTECTION MODE**

On the Transparency International EU website we use components (videos) of YouTube, LLC 901 Cherry Ave., 94066 San Bruno, CA, USA, a company belonging to Google Inc., Amphitheatre Parkway, Mountain View, CA 94043, USA.

To this end, we use the “ – enhanced data protection mode – ” option provided by YouTube.

When you display a page that has an embedded video, a connection will be made to the YouTube server and the content will appear on the Transparency International EU website via a communication to your browser.

According to the information provided by YouTube, in “ – enhanced data protection mode -”, data is only transferred to the YouTube server, in particular which of the Transparency International EU web pages you have visited, if you watch the video. If you are logged onto YouTube at the same time, this information will be matched to your YouTube member account. You can prevent this from happening by logging out of your member account before visiting the Transparency International EU website.

Further information about data protection by YouTube is provided by Google under the following link:

<https://policies.google.com/privacy?hl=en>

## **USE OF VIMEO COMPONENTS**

We use Vimeo components on our site. Vimeo is a service of Vimeo LCC, 555 West 18th Street, New York, New York 10011, USA.

Whenever you visit Transparency International EU, which is equipped with such a component, this component causes the browser you are using to download a corresponding display of the Vimeo component. When you visit our site and are at the same time logged into Vimeo, Vimeo recognises by means of the information collected by the component, which specific page you are visiting and assigns this information to your personal account at Vimeo. If, for example, you click on the “Play” button or make comments, this information will be conveyed to your personal user account at Vimeo and stored there. In addition, the information that you have visited our site will be passed on to Vimeo. This is done regardless of whether you click on the component/comment or not.

If you want to prevent this transmission and storage of data by Vimeo about you and your behaviour on Transparency International EU, you must log out of Vimeo before you visit our site. Vimeo’s Privacy Policy provides more detailed information concerning this, in particular regarding the collection and use of data by Vimeo: <https://vimeo.com/privacy>

## **USE OF MAILCHIMP**

### *Newsletter Consent*

You will be asked to consent to the use of your personal data to receive our newsletter as follows:

“Our newsletter informs you about the latest news and updates from Transparency International EU. You can find more information about the content, the registration process, the tracking methods and MailChimp in general in our privacy policy. I have read the privacy policy and I give my consent to data being processed by a service provider located in the United States”.

We use the newsletter to provide you with regular updates about our offers. To receive our newsletter, you will need a valid email address. We will then check the email address entered to ensure that you are actually its owner or if its owner has agreed to receive our newsletter. By registering for the newsletter, we will save your IP address, first and last name, and date and time of registration. This will be used in case a third party misuses your email address to subscribe to our newsletter without your knowledge.

We will not compare the data collected during newsletter registration with any other data that might be collected by other components of our site.

#### *Newsletter by MailChimp*

We use MailChimp to send our newsletter to our subscribers. MailChimp is a service provided by The Rocket Science Group, LLC, 512 Means Street, Suite 404, Atlanta, GA 30318, USA.

The data stored when you registered for the newsletter (email address, first name, last name, IP address, and time and date of registration) will be sent to a server operated by The Rocket Science Group in the United States and stored there in accordance with the EU-US Privacy Shield.

Further information about the data protection offered by MailChimp can be found at: <http://mailchimp.com/legal/privacy/>

Further information about the EU-US Privacy Shield can be found at: the European Commission page on Data Protection: Rules for the protection of personal data inside and outside of the EU: [http://ec.europa.eu/justice/data-protection/international-transfers/eu-us-privacy-shield/index\\_en.htm](http://ec.europa.eu/justice/data-protection/international-transfers/eu-us-privacy-shield/index_en.htm)

You may cancel your newsletter subscription and revoke your consent to the storage of this data at any time with future effect. For instructions to take this step, please refer to the confirmation email and each newsletter.

#### *Newsletter tracking*

Our newsletter includes so-called web bugs that allow us to recognise if and when an email has been opened and which links in the email have been clicked by its recipient.

This data is stored by us so that we can best align our newsletter to the wishes and interests of our subscribers. Accordingly, the data thus collected is used to send personalised newsletters to each recipient.

You will be asked to consent to the use of your personal data as follows: “I agree that my data and my user responses will be stored electronically by newsletter tracking so that I can receive a personalised newsletter. The revocation of the consent to receive the newsletter constitutes a revocation of the consent for the tracking described above.”

By revoking the consent to receive the newsletter, the consent to the aforementioned tracking is revoked.

### **USING PAYPAL AS A PAYMENT METHOD**

If, while completing your donation, you decide to use PayPal as an online payment service, your contact details will be sent to PayPal during the order process. PayPal is a service from PayPal (Europe) S.à.r.l & Cie. SCA, 22-24 Boulevard Royal, L-2449 Luxembourg. PayPal assumes the function of an online payment service and trustee, and offers buyer protection services.

The personal data transmitted to PayPal usually includes your first name, last name, address, telephone number, IP address, e-mail address, or other data required to process your order, such as the quantity of articles ordered, the article number, invoice amount, percentage taxes and invoice details, etc.

This information needs to be transferred to process your order using your chosen payment method, mainly in order to confirm your identity and manage your payment and the customer relationship.

Please however note the following: PayPal may also pass on your personal data to subcontractors or other affiliates, to the extent necessary for fulfilling the contractual obligations arising from your order or for processing personal data in your order.

Depending on the payment type you preselect in your PayPal account, which may include payment by invoice or direct debit, PayPal will transfer the personal data transferred to PayPal to credit agencies. The information transferred serves to identify you and to verify your creditworthiness with regard to the order you have placed.

Please refer to the PayPal Privacy Policy for more information on the credit agencies PayPal transfers data to and which data is collected, processed, stored and passed on by PayPal: <https://www.paypal.com/de/webapps/mpp/ua/privacy-full>

### **USING STRIPE AS A PAYMENT METHOD**

For the purpose to proceed with payments we use Stripe. Stripe is a service from Stripe, Inc, 185 Berry Street, Suite 550, San Francisco, CA 94107, USA. Your data will be sent to a server operated by Stripe, Inc in the United States.

You can find more information about Stripe here:

<https://stripe.com/privacy>

Stripe also participates in and has certified its compliance with the EU-U.S. Privacy Shield Framework. For more information and to view the Privacy Shield policy, go here:

<https://www.privacyshield.gov/participant?id=a2zt00000000L1HMAA0&status=Active>

### **USING DONORBOX AS A PAYMENT METHOD**

For the purpose to proceed with payments we use DonorBox. DonorBox is a service from Rebel Idealist LLC, 1885 Mission St, San Francisco, CA 94103. Your data will be sent to a server operated by Rebel Idealist LLC in the United States.



You can find more information about DonorBox here:

<https://donorbox.org/privacy>

## **USE OF GOOGLE ADWORDS**

For purposes of promotion, the Transparency International EU website also employs the Google ad tool “Google-Adwords”. As part of this, we employ the analysis service “Conversion-Tracking” from Google Inc., 1600 Amphitheatre Parkway, Mountain View, CA 94043 USA, hereinafter referred to as “Google”.

If you access our site by way of a Google ad, a cookie is placed on your computer. Cookies are small text files that your internet browser downloads and stores to your computer. These so-called “conversion cookies” cease to be active after 30 days and are not used to identify you personally. If you visit certain pages of our website while the cookie is still active, we and Google know that you, as user, have clicked on ads placed on Google and were redirected to our site.

Google uses the information obtained through “conversion cookies” to compile statistics for our website. These statistics tell us the total number of users who have clicked on our ad as well as which pages of our site were then accessed by each user. However, neither we nor other advertisers who use “Google-Adwords” receive any kind of information that can be used to personally identify users. You can prevent the installation of “conversion cookies” by making the appropriate change to your browser settings, for example by setting your browser so that the automatic placement of cookies is deactivated or by blocking cookies from the domain “googleadservices.com”.

You can obtain the relevant data privacy policy from Google at the following link:

<https://services.google.com/sitestats/de.html>

## **INFORMATION / CANCELLATION / DELETION**

On the basis of the Federal Data Protection Act, you may contact us at no cost if you have questions relating to the collection, processing or use of your personal information, if you wish to request the correction, blocking or deletion of the same, or if you wish to cancel explicitly granted consent. Please note that you have the right to have incorrect data corrected or to have personal data deleted, where such claim is not barred by any legal obligation to retain this data.

If you wish to exercise any of these rights or have any questions about this policy, please contact:

The Data Protection Officer

Transparency International Liaison Office of the European Union AISBL,  
Rue du Commerce 31,  
1000 Brussels, Belgium.

or please email us: [brussels@transparency.org](mailto:brussels@transparency.org)



