



# DATA PROTECTION AND PRIVACY POLICY

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This privacy policy outlines the guidelines and processes regarding the gathering, utilisation, and sharing of your information when utilising The Centre's services. It also informs you about your privacy rights and the legal safeguards in place to protect you.

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## 1. GENERAL

This Privacy Policy describes Our policies and procedures on the collection, use and disclosure of Your information when You use the Service and tells You about Your privacy rights and how the law protects You.

We use Your Personal data to provide and improve the Service. By using the Service, You agree to the collection and use of information in accordance with this Privacy Policy.

*Last updated: July 15, 2021*

*Based on GDPR – Europe’s General Data Protection Regulations*

### 1.1 Interpretation

The words of which the initial letter is capitalised have meanings defined under the following conditions. The following definitions shall have the same meaning regardless of whether they appear in singular or in plural.

### 1.2 Definition(s)

For the purposes of this Privacy Policy:

- C Account** means a unique account created for You to access our Service or parts of our Service.
- C Company** (referred to as either "the Company", "We", "Us" or "Our" and/or "The Centre" in this Agreement) refers to CCR CSR (HK) Limited , Tung Che Commercial Centre 8/F , Unit 808, 13:50 No. 246 Des Voeux Road West Sai Yin Pun Hong Kong.
- C Cookies** are small files that are placed on Your computer, mobile device or any other device by a website, containing the details of Your browsing history on that website among its many uses.
- C Country** refers to: any country where The Centre collects Data.
- C Device** means any device that can access the Service such as a computer, a cell phone or a digital tablet.
- C Personal Data** is any information that relates to an identified or identifiable individual.
- C Service** refers to the Website and any services provided by the Company.
- C Service Provider** means any natural or legal person who processes the data on behalf of the Company. It refers to third-party companies or individuals employed by the Company to facilitate the Service, to provide the Service on behalf of the Company, to perform services related to the Service or to assist the Company in analysing how the Service is used.
- C Usage Data** refers to data collected automatically, either generated by the use of the Service or from the Service infrastructure itself (for example, the duration of a page visit).
- C Website** refers to The Centre, accessible from [www.childrights-business.org](http://www.childrights-business.org)
- C You** means the individual accessing or using the Service, or the company, or other legal entity on behalf of which such individual is accessing or using the Service, as applicable.

## **2. COLLECTING AND USING YOUR PERSONAL DATA**

### **2.1 Types of Data Collected**

#### **2.1.1 Personal Data**

While using Our Service, We may ask You to provide Us with certain personally identifiable information that can be used to contact or identify You. Personally identifiable information may include, but is not limited to:

- Job title
- Company
- Work email address
- Phone number
- Office address
- Town/city/state
- Country
- Whether you are a client of The Centre's or not
- Your organisation/company type
- Whether you are a member of the CRIB Working Group or not
- Data usage

#### **2.1.2 Child(ren)'s Personal Data for specific projects**

- Last name and given names
- Date of birth
- Phone number
- Address
- Town/city/state
- Country

#### **2.1.3 Usage Data**

Usage Data is collected automatically when using the Service.

Usage Data may include information such as Your Device's Internet Protocol address (e.g. IP address), browser type, browser version, the pages of our Service that You visit, the time and date of Your visit, the time spent on those pages, unique device identifiers and other diagnostic data.

When You access the Service by or through a mobile device, We may collect certain information automatically, including, but not limited to, the type of mobile device You use, Your mobile device unique ID, the IP address of Your mobile device, Your mobile operating system, the type of mobile Internet browser You use, unique device identifiers and other diagnostic data.

We may also collect information that Your browser sends whenever You visit our Service or when You access the Service by or through a mobile device.

### 3. TRACKING TECHNOLOGIES AND COOKIES

#### 3.1 General

We use Cookies and similar tracking technologies to track the activity on Our Service and store certain information. Tracking technologies used are beacons, tags, and scripts to collect and track information and to improve and analyse Our Service. The technologies We use may include:

- **Cookies or Browser Cookies.** A cookie is a small file placed on Your Device. You can instruct Your browser to refuse all Cookies or to indicate when a Cookie is being sent. However, if You do not accept Cookies, You may not be able to use some parts of our Service. Unless you have adjusted Your browser setting so that it will refuse Cookies, our Service may use Cookies.
- **Flash Cookies.** Certain features of our Service may use local stored objects (or Flash Cookies) to collect and store information about Your preferences or Your activity on our Service. Flash Cookies are not managed by the same browser settings as those used for Browser Cookies. For more information on how You can delete Flash Cookies, please read "Where can I change the settings for disabling, or deleting local shared objects?" available at [https://helpx.adobe.com/flash-player/kb/disable-local-shared-objects-flash.html#main\\_Where\\_can\\_I\\_change\\_the\\_settings\\_for\\_disabling\\_or\\_deleting\\_local\\_shared\\_objects](https://helpx.adobe.com/flash-player/kb/disable-local-shared-objects-flash.html#main_Where_can_I_change_the_settings_for_disabling_or_deleting_local_shared_objects)
- **Web Beacons.** Certain sections of our Service and our emails may contain small electronic files known as web beacons (also referred to as clear gifs, pixel tags, and single-pixel gifs) that permit the Company, for example, to count users who have visited those pages or opened an email and for other related website statistics (for example, recording the popularity of a certain section and verifying system and server integrity).

Cookies can be "Persistent" or "Session" Cookies. Persistent Cookies remain on Your personal computer or mobile device when You go offline, while Session Cookies are deleted as soon as You close Your web browser. Learn more about cookies: [What Are Cookies?](#).

We use both Session and Persistent Cookies for the purposes set out below:

#### 3.2 Necessary / Essential Cookies

- **Type:** Session Cookies
- **Administered by:** Us
- **Purpose:** These Cookies are essential to provide You with services available through the Website and to enable You to use some of its features. They help to authenticate users and prevent fraudulent use of user accounts. Without these Cookies, the services that You have

asked for cannot be provided, and We only use these Cookies to provide You with those services.

### 3.3 Cookies Policy / Notice Acceptance Cookies

- C Type:** Persistent Cookies
- C Administered by:** Us
- C Purpose:** These Cookies identify if users have accepted the use of cookies on the Website.

### 3.4 Functionality Cookies

- C Type:** Persistent Cookies
- C Administered by:** Us
- C Purpose:** These Cookies allow us to remember choices You make when You use the Website, such as remembering your login details or language preference. The purpose of these Cookies is to provide You with a more personal experience and to avoid You having to re-enter your preferences every time You use the Website.

## 4. USE OF YOUR PERSONAL DATA

The Centre for Child Rights and Business (shortened as 'The Centre' henceforth) collects personally identifiable information in the following ways:

### 4.1 Children Personal Data

When a remediation is started, we collect a certain number of personal data to be able to carry through a specific remediation contract.

Please refer to Appendix I for consent form.

This data remains strictly confidential and is only handled by The Centre's CLRR team or a third party that has signed an NDA prior to gaining access to the data for the purpose of the contract completion.

### 4.2 Member and Client Data

When a company joins as a member of The Centre's CRIB Working Group or subscribes to our mailing list, we collect business contact data in the form of the following data from you:

- C** First and last name
- C** Job title
- C** Company

- ☐ Work email address
- ☐ Phone number
- ☐ Office address
- ☐ Town/city/state
- ☐ Country
- ☐ Whether you are a client of The Centre's or not
- ☐ Your organisation/company type
- ☐ Whether you are a member of the CRIB Working Group or not

All personal data collected will only be used to process your membership application and send you product information and occasional invites or announcements from The Centre, if you have subscribed to The Centre's mailing list. We do not sell personal data to anyone and do not share it.

### 4.3 Human Resources Data

The Centre occasionally hires new employees, and we are always pleased to receive solicited job applications. If you wish to apply for a position with us, please apply following the directions on our job advertisements posted on our website. Cover letters, an up-to-date CV and any other information required as part of the recruitment process should be sent to [recruitment@childrights-business.org](mailto:recruitment@childrights-business.org).

When you submit your application for employment with The Centre, we process your personal data in accordance with applicable personal data regulations. This implies that:

- ☐ Your personal data will be treated confidentially.
- ☐ We only use your personal data for recruitment purposes.
- ☐ We do not disclose your personal data.
- ☐ Access to this personal data is restricted to relevant employees within The Centre only.

Any personal data received from you with your application will only be used for the purpose of processing your application and will not be disclosed, except to The Centre's HR staff and upper management in connection with the recruitment procedure.

### 4.4 Events Data

Individuals within companies provide their corporate information to register for an event or workshop with The Centre. During event registration, where information is voluntarily provided during event signup, we collect the following information from you:

- ☐ First and last name
- ☐ Job title
- ☐ Company
- ☐ Work e-mail address
- ☐ Phone number
- ☐ Town/city/state

## **C** Country

The Centre's events may be photographed and/or video/audio recorded for the purpose of reflecting the events in The Centre's publications and on The Centre's website. We focus our efforts solely on the key note speakers and other voluntary participants from the audience, as well as the audience as a whole.

### **4.5 Website Visitors' Data**

In general, website visitors do not need to provide personalised information to The Centre. We do collect "aggregate data," that is, group data with no personal identifiers. We use this aggregate data to help us understand how the site is being used, to track our monthly website traffic and to improve its usability. We also use it to enhance the quality and availability of products and services we offer.

We also, with explicit permission, use aggregate data from online surveys you choose to fill out for research and publication purposes.

If personal data is provided, and retained, it is only name, business contact email, and business contact phone number, which allow The Centre to contact the visitor at his or her organisation. The Centre solely holds the information and engages in no contact-sharing programme with other organisations.

When you access the Site [or our mobile application], your personal information is not collected through the use of tracking technology. Most browsers are set to accept cookies by default. You can remove or reject cookies, but be aware that such action could affect the availability and functionality of the Site [or our mobile application]. In compliance with the EU ePrivacy Directive, The Centre's website asks permission of the visitor prior to setting Cookies. Should the visitor agree, The Centre's server will only collect the following information:

- C** The visitor's IP address (including the domain name associated with the IP address, i.e. using reverse look-up).
- C** The date and time of the visit to the website.
- C** The pages visited on the website.
- C** The browser being used.

In addition, where this is available, The Centre will also collect:

- C** The country from which the visitor is accessing the website (only the ending is saved, e.g., de, since this indicates the relevant country).
- C** The language of the browser being used.
- C** The website from which the visitor is accessing The Centre's website.
- C** The search word used (if the site is accessed via a search engine).
- C** The type of connection and operating system.

We only use this data to improve the visitor's website experience.

When it comes to Cookies, we rely on consent given as the lawful basis under GDPR Article 6(1)(a).

#### **4.6 Inquiries**

When you send an inquiry to us through our contact form, we use the personal data that you have stated in the contact form to answer you. Any personal data received from you will not be used for any other purpose without your prior consent and knowledge and will not be disclosed.

We rely on a legitimate interest as the lawful basis under GDPR Article 6(1)(f) for the processing of data in connection to inquiries.

#### **4.7 Surveys**

In order to ensure that the services we offer meet your requirements, we may ask for your feedback in form of surveys and polls. Any feedback received from you will only be used for the purpose of improving our services and will not be disclosed.

We rely on your consent as the lawful basis under GDPR Article 6(1)(a) for the processing of data in connection with surveys.

#### **4.8 Research Surveys**

In order to complete certain types of research surveys , The Centre may collect data in-field. These questionnaire are mostly anonymous but in case they contain any personal data, this data remains strictly confidential and used only for the purpose of completing the research survey.

We rely on your consent as the lawful basis under GDPR Article 6(1)(a) for the processing of data in connection with surveys.

#### **4.9 Interviews**

If we contact you to perform stakeholder interviews, any personal data received from you will not be used for any other purpose without your prior consent.

#### **4.10 eCommerce**

The Centre's use of ecommerce is limited to registration for a limited number of events, webinars, workshops and online training each year. Individuals within companies provide their corporate information to register for an event. We use the data collected in order to manage attendee numbers and monitor whether our events are reaching the targeted audiences.

We rely on fulfilment of contract as the lawful basis under GDPR Article 6(1)(b) for the processing of eCommerce Data.

#### **4.11 WeChat eLearning Platform**

Those who follow our WeChat-based eLearning platform agree to have their basic WeChat information (account name, profile picture) collected by WeChat (owned by Tencent). We have no control over how that information is stored or used and followers wishing to learn more are kindly asked to read WeChat's privacy policies.

We do not download, store or share any personal information from followers of our WeChat eLearning platform.

### **5. RETENTION OF YOUR PERSONAL DATA**

The Company will retain Your Personal Data only for as long as is necessary for the purposes set out in this Privacy Policy. We will retain and use Your Personal Data to the extent necessary to comply with our legal obligations (for example, if we are required to retain your data to comply with applicable laws), resolve disputes, and enforce our legal agreements and policies.

The Company will also retain Usage Data for internal analysis purposes. Usage Data is generally retained for a shorter period of time, except when this data is used to strengthen the security or to improve the functionality of Our Service, or We are legally obligated to retain this data for longer time periods.

### **6. TRANSFER OF YOUR PERSONAL DATA**

Your information, including Personal Data, is processed at the Company's operating offices and in any other places where the parties involved in the processing are located. It means that this information may be transferred to — and maintained on — computers located outside of Your state, province, country, or other governmental jurisdiction where the data protection laws may differ than those from Your jurisdiction.

Your consent to this Privacy Policy followed by Your submission of such information represents Your agreement to that transfer.

The Company will take all steps reasonably necessary to ensure that Your data is treated securely and in accordance with this Privacy Policy and no transfer of Your Personal Data will take place to an organisation or a country unless there are adequate controls in place including the security of Your data and other personal information.

## **7. DISCLOSURE OF YOUR PERSONAL DATA**

### **7.1 Business Transactions**

If the Company is involved in a merger, acquisition or asset sale, Your Personal Data may be transferred. We will provide notice before Your Personal Data is transferred and becomes subject to a different Privacy Policy.

### **7.2 Law enforcement**

Under certain circumstances, the Company may be required to disclose Your Personal Data if required to do so by law or in response to valid requests by public authorities (e.g. a court or a government agency).

### **7.3 Other legal requirements**

The Company may disclose Your Personal Data in the good faith belief that such action is necessary to:

- Comply with a legal obligation.
- Protect and defend the rights or property of the Company.
- Prevent or investigate possible wrongdoing in connection with the Service.
- Protect the personal safety of Users of the Service or the public.
- Protect against legal liability.

## **8. SECURITY OF YOUR PERSONAL DATA**

The security of Your Personal Data is important to Us, but remember that no method of transmission over the Internet, or method of electronic storage is 100% secure. While We strive to use commercially acceptable means to protect Your Personal Data, We cannot guarantee its absolute security.

## **9. LINKS TO OTHER WEBSITES**

Our Service may contain links to other websites that are not operated by Us. If You click on a third party link, You will be directed to that third party's site. We strongly advise You to review the Privacy Policy of every site You visit.

We have no control over and assume no responsibility for the content, privacy policies or practices of any third party sites or services.

## 10. YOUR RIGHTS

(Chapter 3 of the GDPR) each Data Subject has eight rights. These are:

- ❑ **The right to be informed:** You have the right to be kept informed of the way your Data is used, under certain conditions.
- ❑ **The right of access:** You have the right to request Our Company for copies of your personal data.
- ❑ **The right to rectification:** You have the right to request that Our Company correct any information you believe inaccurate. You also have the right to request Our company to complete information you believe is incomplete.
- ❑ **The right to erasure:** You have the right to request Our Company to erase your personal data under certain conditions.
- ❑ **The right to restrict processing:** You have the rights to request that Our Company restricts the processing of your personal data under certain conditions.
- ❑ **The right to data portability:** You have the right to request that Our Company transfer the data that we have collected to another organization, or directly to you, under certain conditions.
- ❑ **The right to object:** You have the right to object to Our Company's processing of your personal data.
- ❑ **Rights related to automated decision making and profiling.**

## 11. CHANGES TO THIS PRIVACY POLICY

We may update Our Privacy Policy from time to time. We will notify You of any changes by posting the new Privacy Policy on this page.

We will let You know via email and/or a prominent notice on Our Service, prior to the change becoming effective and update the "Last updated" date at the top of this Privacy Policy. You are advised to review this Privacy Policy periodically for any changes. Changes to this Privacy Policy are effective when they are posted on this page.

## 12. RESOLVING COMPLAINTS

If you want to lodge a complaint over our processing of your personal data, or have any concerns about the way The Centre is handling your User Personal Information please contact us directly at [privacy@childrights-business.org](mailto:privacy@childrights-business.org) .

### 13. CHANGES

We recognise that data protection and privacy is an ongoing responsibility, so we reserve our right to make changes to this Data Protection and Privacy Policy from time to time as we undertake new personal data practices or adopt new privacy policies, etc. If such changes are substantial, we will notify you via email, provided that we have your email address.

### 14. CORPORATE INFORMATION

Effective from 1st January 2021, CCR CSR has changed its name to become The Centre for Child Rights and Business (shortened version 'The Centre').

Our new name reflects The Centre for Child Rights and Business' mission to improve the lives of children by working with companies to promote and respect children's rights in all their operations with a particular focus on supply chains.

Our name change also reflects a new, simplified organisational structure for The Centre which brings together three legal entities: Rätta Barnen AB (parent company), CCR CSR (Beijing) Limited (subsidiary) and CCR CSR (HK) Ltd (subsidiary). Rätta Barnen Service AB with its subsidiaries is wholly owned by Save the Children Sweden. The Centre's new organisation is operational as of January 2021.

### 15. CONTACTING US

If you have any questions or concerns about the way The Centre is handling your User Personal Information, please let us know immediately. We want to help. You may contact us :

- 📧 **By email:** [privacy@childrights-business.org](mailto:privacy@childrights-business.org)
- 📧 **By visiting this page on our website:** [www.childrights-business.org/contact-us](http://www.childrights-business.org/contact-us)
- 📧 **By phone number:** +86 10 8440 0021

We will respond promptly.

## **16. OPTING IN/OUT FROM OUR NEWSLETTER AND COMMUNICATIONS**

To sign up to The Centre’s mailing list, click on the “join our mailing list” button located throughout our website.

If you no longer wish to receive correspondence, emails, or other communications from us, you may opt-out by:

- ☐ Clicking on “unsubscribe” at the bottom of our newsletters.
- ☐ Contacting us using the contact form on our website.
- ☐ Write an email to [info@childrights-business.org](mailto:info@childrights-business.org) with your request.

## 17. APPENDICES

### 17.1 Appendix I: Consent to the Use of Children's Data

- The Centre will ensure, whenever possible, that clients understand the principle of informed consent and the circumstances in which it may be required.
- Where children and families have limited capacity to comprehend or grant informed consent to use their data, The Centre will provide information according to their level of understanding and restrict their freedom of decision and action as little as possible.
- The Centre will identify any pertinent legal requirements regarding informed consent when providing services to children.
- The Centre will obtain consent from children and families for interviews, reporting, photographs, and videos.
- The Centre will respect to privacy and confidentiality of children and families' data and to responsibly use the data collected in the course of the rapid assessments and needs assessments. This includes:
  - paying attention not to interfere unnecessarily with children and families' privacy when collecting their information.
  - Obtaining informed consent from children and families to use their data.
- The Centre will inform children and families at the beginning of a professional service of:
  - the restrictions of confidentiality in any given circumstances, by explaining agency or legislative requirements pertaining to the recording, computerizing or sharing of their information.
  - the purpose for which data is acquired.
  - how the data may be used
- The Centre will only disclose children and families' confidential data in the situations stated above or in any one or more of the below circumstances:
  - if asking for advice from or conferring with other professionals or colleagues in relation to tackling the different situations faced by children and families, all third parties in all cases will have to agree to protecting their confidentiality and data.
  - if by sharing information to related third parties a real, identifiable risk of harm to the children or specific persons can be prevented.
- The Centre will use a pseudonym in place of the children's real name and withhold identifying details when using their data for purposes like case presentations and consultations.



## CONTACT

The Centre for Child Rights and Business

+86 10 8440 0021

[childrights-business.org](http://childrights-business.org) 

[info@childrights-business.org](mailto:info@childrights-business.org) 

**THE CENTRE**  
FOR CHILD RIGHTS AND BUSINESS