

International Social Service-USA Privacy Policy as of July, 2020

Purpose

International Social Service-USA (“ISS-USA” or “the organization”) acknowledges the importance of ensuring individuals and groups interacting with ISS-USA understand the way in which their information is gathered and maintained. This document, hereinafter referred to as “Privacy Policy” is a statement to describe the type(s) of information collected, why information is collected, and how the organization may use information.

Definition of Personal Information

“Personal Information” is any information relating to an identified or identifiable natural person (“Data Subject”); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

Scope of Policy

This Privacy Policy describes the ways ISS-USA manages Personal Information[1] it receives in the course of its operations that include but are not limited to the provision of child protection services and other social services (“Services”). All individuals who process Personal Information on behalf of ISS-USA are expected to protect those data, however the intended scope of this policy is to apply to ISS-USA and is not intended to extend to, supersede or substitute the privacy policy(ies) of third-party vendors or other affiliates with which ISS-USA may interact in its day-to-day business.

ISS-USA complies with the requirements of Regulation (EU) 2016/679 (“GDPR”) and the legislation implementing GDPR in EU member states. ISS-USA adheres to the GDPR Principles of Lawfulness, Fairness and Transparency; Purpose Limitation; Data Minimization; Accuracy of Information; Storage Limitation; Integrity and Confidentiality; and Accountability as set forth in this Privacy Notice.

Types of Information Collected

The types of Personal Information ISS-USA may collect depend on the nature of the relationship individuals have with the organization and the requirements of applicable law. ISS-USA does not engage in automated decision making when processing personal data. Below are the legal bases for processing Personal Information, some of the ways in which information is collected, and how information is used.

Data Collected in Order to Provide Services

ISS-USA may collect the following Personal Information in order to provide the Services:

- Personal Information of children, their relatives, and other adults (for example a family friend) to whom the Services are provided. Personal Information collected may include but are not limited to:
 - Name, social security number or other identification number, date of birth, relevant medical information and contact details;
- Characteristics of the children and their relatives to whom child protection services are provided. Characteristics may include but are not limited to:
 - Gender, sex life, ethnicity, language, nationality and country of birth; and
- Personal Information of the employees of the local councils and other persons (such as lawyers and social workers) with whom ISS-USA communicates for the purposes of providing the Services. Personal Information collected may include but are not limited to:
 - Name and contact details.

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Because of the personalized and often sensitive nature of the Services provided, it should be noted that the above bullets are not intended to be an exhaustive list of the types of Personal Information collected and that ISS-USA may need to collect other Personal Information to ensure adequacy of Services provided.

Data Collected through the ISS-USA Website

ISS-USA accepts inquiries about Services, donations, referrals for Services and requests for further information about ISS-USA through the ISS-USA website (www.iss-usa.org).

For Services inquiries, ISS-USA generally collects the following Personal Information:

- Name;
- State and country;
- Contact information including email address and phone number;
- Other Personal Information the individual submitting the inquiry may provide.

For donations, ISS-USA generally collects the following Personal Information:

- Name;
- Address;
- Contact information including email address and phone number;
- Other Personal Information the individual donating may willingly provide;
- Preferences related to ongoing interaction with ISS-USA.

For referring a case, ISS-USA generally collects the following Personal Information for both the individual referring a case and the individual(s) for whom Services are being requested:

- Name;
- Address;
- State and country;
- Contact information including email address and phone number;

In addition, the following Personal Information is collected only for the individual(s) for whom Services are being requested:

- Date of birth;
- Gender;
- Civil status;
- Nationality;
- Place of birth;
- Family connections (*e.g.*, siblings);
- Medical information;
- Other Personal Information the individual referring the case may willingly provide.

For requests for more information (“Join Our Mailer”), ISS-USA generally collects the following Personal Information:

- Name;
- Address;
- State and country;
- Contact information, including email address;
- Other Personal Information the individual requesting information may willingly provide.

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Cookies

A cookie is a small file which asks permission to be placed on an individual's computer's hard drive. Once individuals agree, the file is added and the cookie helps analyze web traffic or lets individuals know when they visit a particular site. Cookies allow web applications to respond to individuals. The web application can tailor its operations to individual needs, likes and dislikes by gathering and remembering information about preferences.

ISS-USA's website does not currently use any direct or third-party cookies on its website.

Links to Other Websites

ISS-USA's website may contain links to other websites of interest. However, once individuals have used these links to leave ISS-USA's site, note that ISS-USA does not have any control over that other website. Therefore, ISS-USA cannot be responsible for the protection and privacy of any information provided while visiting such sites and such sites are not governed by this privacy policy. Individuals should exercise caution and look at the privacy statement applicable to the website in question.

How and Why Personal Information is Used

ISS-USA ensures Personal Information is used for legitimate reasons and that the use of Personal Information either directly by ISS-USA or by third parties that enable the Services of ISS-USA is in the interests of the individuals to whom Personal Information belongs. The following are the legitimate, legal reasons ISS-USA uses Personal Information.

Provision of Services

Providing services for re-uniting family members, re-patriation of U.S. citizens, children's services, specifically:

- Provide child protective services to vulnerable and at-risk children and vulnerable adults;
- Provide casework services for child protection cases, including facilitating inter-country collaboration on international child protection casework;
- Provide affiliates, local authorities or counsel and other providers of child protection and social services both inside and outside of the United States of America (together, "Approved Parties") with information that enable them to carry out child protective services and casework services for child protection cases;
- Enable child protection alerts to be made to the relevant authorities regarding children at risk;
- Respond to questions and requests;
- Send email or postal updates about ISS-USA's work according to individual preferences;
- Develop and carry out marketing and fundraising activities;
- Process a donation or a monthly donation;
- Provide consulting and advisory services;
- Ensure compliance with relevant laws, regulations and standards; and
- Enable ISS-USA to carry out contractual obligations.
- When it is ISS-USA's legal duty, including in the public interest, or
- When it is in ISS-USA's legitimate interest, or
- When an individual(s) consents to it.
- Ensuring that children are placed in a permanent home
- Helping to protect children and vulnerable adults by providing social services
- Providing professional advice and support when individuals complete a request for information online

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- Complying with regulations applicable to ISS-USA
- Keeping records up to date and working out which information/ services may interest individuals and telling about them (in alignment with individual preferences)

Research

Sharing data with third party researchers (academic, governmental, non-governmental) to be used in research projects relating to international social work and child protection. Any Personal Information would be anonymized as early as possible in the analysis process and any published materials would be anonymized. The research purposes are likely to include:

- Mapping of cross border cases; and
- Identifying gaps or weaknesses in processing cross-border cases in an effort to improve outcomes.
- Analysis of demographical information
- Reporting to ISS-USA's funders and supporters
- Other research aligned with charitable objects
- ISS-USA's own research projects, including those aligned with the purposes outlined above
- When it is in ISS-USA's legitimate interest, or
- When individuals consent to it.
- Achieving better outcomes for children and families
- Complying with funding or contract conditions.

Transfer of Information

ISS-USA does not sell or otherwise disclose Personal Information about individuals, except as described in this Privacy Policy or as individuals explicitly consent. ISS-USA may share Personal Information with Approved Parties in order to be able to provide Services. ISS-USA requires the Approved Parties to agree to maintain confidentiality and security of Personal Information they maintain on behalf of ISS-USA, including to provide at least the same level of protection as required by the GDPR, not to use it for any purpose other than the purpose for which ISS-USA retained them and to notify ISS-USA if they make a determination that they can no longer comply with that obligation.

ISS-USA may disclose information: (i) if required to do so by law, court order or legal process; or (ii) in response to lawful requests by public authorities, including to meet national security or law enforcement requirements.

Personal Information may be transferred to ISS-USA's partners and relevant authorities around the world. Any such transfer of Personal Information shall take place only in accordance with and as permitted by the GDPR. ISS-USA takes steps to ensure that appropriate technical and organizational security measures and protections are applied when transferring Personal Information outside of the United States of America and that privacy rights outlined in this Privacy Policy are preserved.

Retention

ISS-USA maintains a Document Retention and Destruction Policy, which includes types of documents ISS-USA is required to retain and the length of time the documents must be retained. The policy states, "in general, documents that are not subject to a retention requirement should be kept only long enough to accomplish the task for which they were generated."

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Security

The security of all Personal Information is important to ISS-USA, and ISS-USA takes reasonable steps designed to protect Personal Information. ISS-USA maintains administrative, technical and physical defenses designed to protect Personal Information that is received against accidental, unlawful or unauthorized destruction, loss, alteration, access, disclosure or use. Specifically, the ISS-USA website utilizes:

- SSL encryption; and
- Password protection.

Right to Opt-Out

Individuals have the right to opt-out of certain uses and disclosures of Personal Information, as set out in this Privacy Policy. Where individuals have consented to ISS-USA's processing of your Personal Information or Sensitive Personal Information, subject to applicable legal obligations, individuals may withdraw that consent at any time and opt-out. Additionally, before ISS-USA uses Personal Information for any new purpose not originally authorized, ISS-USA will provide information regarding the new purpose and provide the opportunity to opt-in to such secondary uses. If individuals choose not to opt-in to secondary use of your Personal Information, ISS-USA will not process it for that use.

Individual Rights of Access and Choice

Under certain circumstances, individuals have rights under data protection laws in relation to their personal data. It should be noted that the nature of the work of ISS-USA inherently results in partnership with various external parties (*e.g.*, social workers, lawyers, local authorities, etc.) and that individuals' rights under this Privacy Policy are limited to the scope of the personal data ISS-USA directly maintains. Further, rights may be limited as ISS-USA may have contractual or legal obligations, or if the safety and protection of individuals receiving Services may be placed at risk. ISS-USA will make an effort to provide an explanation in instances where rights may be limited. To protect individuals' privacy, ISS-USA will take commercially reasonable steps to verify an individual's identity before granting access to or making any changes to Personal Information.

Individual rights of access and choice include:

- Receive copies of Personal Information maintained and confirm ISS-USA are lawfully processing it;
- Request correction of Personal Information;
- Request erasure of Personal Information, for example, where there is no good reason for ISS-USA continuing to process it;
- Request a transfer of Personal Information directly or to another organization;
- Object to the processing of Personal Information where ISS-USA are relying on a legitimate interest and there is something about a particular situation which makes an individual(s) want to object to processing on this ground as they feel it impacts on their fundamental rights and freedoms;
- Withdraw consent at any time for future processing if the processing of Personal Information is based on consent; and
- Lodge a complaint with a data protection authority. The United States of America does not have a centralized body for taking in complaints, however, individual states may have their own office. Individuals should consult their local government's resources to determine where a complaint may be lodged.

Compliance and Accountability

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If there are any questions or comments regarding this Privacy Policy, ISS-USA privacy practices, or if information or preferences need to be updated, please contact us via email at question@iss-usa.org.

Changes to this Privacy Notice

ISS-USA may update this Privacy Policy from time to time as it deems necessary or appropriate in its sole discretion. If there are any material changes to this Privacy Policy, ISS-USA will provide notification to impacted individuals in a practical manner.

Last updated July, 2020