

# Privacy Policy

At Electronics Watch, we're committed to protecting and respecting your privacy.

This Policy sets out our data collection and processing practices, the conditions under which we may disclose data, and your options regarding the ways in which your personal information is used.

We may update this Policy from time to time so please check this page occasionally to ensure that you are happy with any changes. **By using our website, you agree to the terms of this Policy.**

Any questions regarding this Policy and our privacy practices should be sent by email to [info@electronicswatch.org](mailto:info@electronicswatch.org) or by writing to: Electronics Watch, Kingsfordweg 151, 1043 GR Amsterdam, The Netherlands.

The Policy refers to the Electronics Watch website, as well as any email and contact lists held by Electronics Watch.

Our data protection lead is IT Manager, Simon Gray.

*This policy was last reviewed in June 2025.*

## Data protection

We will never share your information with another organisation for their own marketing purposes and we will never sell your information for any reason whatsoever.

As you use our website, get in touch with us, or take part in Electronics Watch activities, we collect information. Some of this information will be anonymous such as which pages you visit on our websites, and some will contain your personal information such as when you subscribe to our newsletter or sign up for a webinar. Be assured that we will always endeavour to be clear, honest, and transparent with you about the information we collect, and wherever practical will ask your specific consent.

## When do we collect information about you?

*When you give it to us directly via a website form, email, phone call, letter, sign-up sheet or in person conversation.*

You may give us your personal data when you join an email list, download a publication, participate in an Electronics Watch webinar, workshop, or event, appear on an online map, directory, or calendar, when you donate money to us, or when you add your details to a list at an event. Also, when you apply for employment with us, or apply to volunteer, or contact us in another way.

## When you visit our website

We use cookies to identify you when you visit our website, to enable us to improve services for you through, for example:

- remembering if you are logged in so you can move around the website without having to log in again on each page (for example if you are in the affiliates' intranet)
- measuring how many people are using each page of the website and for how long so that we can try to improve the quality of our website.
- enabling you to view content shared on other sites e.g., YouTube.

The Electronics Watch website uses several analytics cookies. If you wish to restrict or block the cookies which are set by the Electronics Watch website, or indeed any other website, you can do this through your browser settings. The Help function within your browser should tell you how. Please be aware that restricting cookies may impact the functionality of the Electronics Watch website.

## What type of information is collected from you?

Typically, we will ask for your name, email address and other contact details. Additionally, we will collect or request other information where it is appropriate to do so, for example:

- The location of your organisation/business and services you offer.
- Your organisation, job title or profession, if relevant to our work.

We will also collect anonymous information about your computer and your visits to our website including your IP address, geographical location, browser type, referral source, length of visit and number of page views (normal procedures for organisations websites). We will not link this information to you individually. Such information informs us about the use of our website and helps us to develop our digital communications tools.

If you attend an Electronics Watch event it is possible that your photograph may be taken. If you object to a photograph of you being reproduced, please let us know and we will ensure that it is not.

## For what purposes do we collect information about you?

The overview below summarises the different reasons why we may collect and use your data. We will not necessarily use your personal information for all these purposes. The purpose will depend on the nature of your relationship with us, and how you interact with Electronics Watch:

1. **Promotion:** Our main communications are to update you on the latest developments of our programme, and we may invite you to participate in activities such as events or surveys. Most of our promotional activities are focused on promoting the aims and objectives of Electronics Watch. We might ask you for feedback on, for example, an event

you have attended or a publication you have downloaded, and we might tell you about other events or publications that we think might be of interest to you. In general, these communications will be by email. They may also take place via online and other digital forums, by phone, in person at events, or other means of communication.

2. **Retail trading:** Electronics Watch occasionally holds ticketed events, using outside parties to facilitate the issuing and management of tickets (e.g., Eventbrite). If you attend an event, we may store your personal information to invite you to similar events in future. Note that Electronics Watch never stores personal financial information, except for some personal financial information of employees to enable, for example, salary and pension payments.
3. **Analysis and tailoring of communications:** We will make use of the information you have given us and your interactions with our services, to help us understand your interests and may tailor and personalise our communications to you.
4. **Being a trustee, advisor, or volunteering for Electronics Watch:** If you are a trustee, on the advisory group, or volunteer with us we may need to use your personal information to update you on our activities, deliver training, manage your activities and generally keep you informed about our work, events and requests to feedback on your experience with us.
5. **Staff administration:** We process the personal information of our employees for recruitment, staff administration, remuneration, pensions, and performance management purposes.

## On what lawful grounds do we process your personal information?

- Information is processed based on an individual's consent.
- Information is processed in line with a contractual relationship.
- Information is processed based on legitimate interest.

We may also share your personal information when we are compelled to do so by a legal authority acting in compliance with the law.

### Consent

We will only send promotional material by email to those who have given consent, usually to send you updates on our activities. Occasionally, for some of our activities, our promotional material may – for example – invite you to an event, or to take part in a survey.

Where you give us consent to process your data, we will always keep a clear record of how and when this consent was obtained. You can withdraw your consent at any time, or request that all your personal data be deleted by emailing: [info@electronicswatch.org](mailto:info@electronicswatch.org).

### Contractual relationships

Sometimes it will be necessary to process personal information so that we can enter contractual relationships with people. For example, if you apply for employment or are freelancing with us.

### Legitimate interests

Applicable law allows personal information to be collected and used if it is reasonably necessary for our legitimate activities if its use is fair, balanced and does not unduly impact individuals' rights.

### What are Electronics Watch's legitimate interests?

#### Governance:

- Working towards our goal: to help public sector organisations work together to meet their responsibility to protect the labour rights and safety of workers in their electronics supply chains.
- Reporting criminal acts and compliance with the legal instructions of law enforcement agencies.
- Internal and external audit for financial or regulatory compliance purpose.
- Reporting to our funders and statutory bodies.

#### Publicity and income generation:

- Conventional direct marketing by email and other forms of marketing, publicity, or advertisement.
- Unsolicited non-commercial messages, e.g., information about latest research, resources, or events.
- Exercise of the right to freedom of expression or information.
- Analysis and improvement of our communications.
- Processing for research purposes.

#### Operational management:

- Employee and volunteer recording and monitoring for recruitment, safety, performance management or workforce planning purposes.
- Provision and administration of staff benefits such as pensions.
- Physical security, IT and network security.
- Maintenance of 'do not contact' lists.
- Processing for historical, research or statistical purposes.

#### Financial management and control:

- Processing of financial transactions and maintaining financial controls (noting that we do not hold personal financial information, except for some personal financial information of employees to enable, for example, salary and pension payments).
- Prevention of fraud, misuse of services, or money laundering.
- Enforcement of legal claims.

#### Purely administrative purposes:

- Responding to enquiries.
- Delivery of requested resources or information.
- Administration of financial transactions.
- Administration of grants and donations.
- Providing 'thank you' communications and receipts.

When we use your personal information, we will always consider if it is fair and balanced to do so and whether it would be within your reasonable expectations that we would use your data in this way.

We will balance your rights and our legitimate interests to ensure that the way in which we use your data never goes beyond what you would expect and is not unduly intrusive or unfair.

#### Do we store your financial details?

Electronics Watch uses online banking systems to process all online financial transactions, and online bookkeeping, for its accounting. We will store selected personal data to our private login account area on these systems – normally name, address, email address, account details and VAT number. We store such data is necessary for the processing of payments and only for those people with whom we have entered a contractual arrangement.

#### Do we collect data about children?

Our website and other communications are targeted at persons over the age of 16. If we have reason to believe that we hold personal data of a person under that age in our databases, we will delete that personal data. In exceptional circumstances we may store the name and limited personal information about a child under the age of 16, for example to identify them in a photograph or to fulfil our safeguarding and health and safety obligations. We will treat such limited information with all due care and respect and in line with our relevant policies and procedures covering such circumstances.

#### How long will we keep your data?

In general, we will hold your personal information on our systems for as long as is necessary for the relevant activity. If you ask us to stop sending you emails or other forms of communication, we will keep your name on our internal suppression list (a 'do not contact' list) to ensure that you are not contacted again. If you exercise your 'right of erasure', we will remove your personal information completely and immediately.

#### Is your personal information secure and who can access it?

Please be assured that you will not receive offers from other companies or organisations as a result of giving your details to us.

We may need to share limited information with our service providers who help us to prepare and send you our communications or process your donations and other responses. However, we do

not allow these organisations to use your data for their own purposes and take care to ensure that they keep your data secure and delete it when it is no longer needed.

We will only ever publish or share your data with your clear and informed consent.

## What are your rights?

Where we rely on your consent to use your personal information, you have the right to withdraw that consent at any time. This includes the right to be unsubscribed from our email list at any time. You also have the following rights:

- Right to be informed – you have the right to be told how your personal information will be used.
- Right of access – you can ask what information we hold on you and to request a copy.
- Right of erasure – you can request that all your personal information is deleted from our records.
- Right of rectification – if you believe our records of your personal information are inaccurate, you have the right to ask for those records to be updated.
- Right to restrict processing – you have the right to ask for processing of your personal data to be restricted if there is disagreement about its accuracy or legitimate usage.
- Right to data portability – you may ask us to provide your information to you – or another service provider – in a machine-readable format.

To exercise these rights, please send a description of the information in question to [info@electronicswatch.org](mailto:info@electronicswatch.org).

If you would like to make a complaint about the way we have processed your data you can [contact the Dutch Data Protection Agency](#),

## Does this policy cover third party websites?

No, this Policy does not cover external websites and services that we link to, and we are not responsible for the privacy practices or content of those sites or services.

## Where can you find further information?

For further information please email [info@electronicswatch.org](mailto:info@electronicswatch.org) or write to:

Electronics Watch, Kingsfordweg 151, 1043 GR Amsterdam, The Netherlands