



# EVERY NATION

## I C E L A N D

### Privacy Policy

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# INTRODUCTION

Every Nation Iceland respects your privacy and is committed to protecting your personal data. This privacy policy will inform you as to how we look after your personal data when you visit our website (regardless of where you visit it from) and tell you about your privacy rights and how the law protects you.

## IMPORTANT INFORMATION AND WHO WE ARE

### 1. Purpose of this privacy policy

This privacy policy aims to give you information on how Every Nation Iceland collects and processes your personal data through your use of this website.

This website is not intended for minors and we do not knowingly collect personal data relating to them, that is minors under the age of 18.

It is important that you read this privacy policy together with any other privacy policy or fair processing policy we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data.

### 2. Changes to the privacy policy and your duty to inform us of changes

We keep our privacy policy under regular review. This version was last updated on 9/14/2020.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

### 3. Controller

Every Nation Iceland is the controller and responsible for your personal data (collectively referred to as "Company", "we", "us" or "our" in this privacy policy).

We have appointed a data protection officer ("DPO") who is responsible for overseeing questions in relation to this privacy policy. If you have any questions about this privacy policy, including any requests to exercise your legal rights, please contact the DPO using the details set out below.

### 4. Contact details

If you have any questions about this privacy policy or our privacy practices, please contact our DPO in the following ways:

Full name of legal entity: Every Nation Iceland

Email address: [agust@everynation.is](mailto:agust@everynation.is)

Postal address: Every Nation Iceland

% Agust Olafsson

Lyngheidi 7 800 Selfoss Iceland

[Telephone number: +354 860 1895

# GLOSSARY

## Lawful Basis:

- **Legitimate Interest** means the interest of our business in conducting and managing our business to enable us to give you the best service/product and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by contacting us.
- **Comply with a legal obligation** means processing your personal data where it is necessary for compliance with a legal obligation that we are subject to.
- **Consent** means processing with your clear and expressed permission to do so.

## THE DATA WE COLLECT ABOUT YOU

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

- **Identity Data** includes your first and last name.
- **Contact Data** includes, email address and telephone numbers, preferred mode of contact, preferred language and country and city of residence.
- **Technical Data** includes internet protocol (IP) address, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, and other technology on the devices you use to access this website.
- **Usage Data** includes information about how you use our website, products and services.
- We also collect, use and share **Aggregated Data** such as statistical or demographic data for any purpose. Aggregated Data could be derived from your personal data but is not considered personal data in law as this data will **not** directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy policy.
- We may process **Special Categories of Personal Data** about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health, and genetic and biometric data). We will only process this information with your explicit consent, unless the law requires or permits us to do so without your consent . See how this information is processed in the next section below.

## 2. How is your personal data collected?

We use different methods to collect data from and about you including through:

- **Direct interactions.** You may give us your Identity, Contact Data by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:
  - apply for our services;
  - give us feedback or contact us.
- **Automated technologies or interactions.** As you interact with our website, we will automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, server logs and other similar technologies. A cookie is a small amount of data that is sent to your browser and stored on your computer's hard drive.

Technical Data from the following parties:

- analytics providers [Hotjar](#), which is based inside the EU.
- advertising networks [Facebook](#) and [Google](#) based outside the EU.
- search information providers Google based outside the EU.
- YouTube. View [YouTube's privacy policy](#).

## 3. How we use your personal data

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Where we have your clear and expressed consent to do so.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal obligation.

See the next section to find out more about the types of lawful basis that we will rely on to process your personal data.

## 4. Purposes for which we will use your personal data

We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest	Retention Period
<p>Online registration of contact details with expressed consent for a member of staff to contact you to have a conversation about your beliefs.</p>	<ul style="list-style-type: none"> <li>● Identity Data</li> <li>● Contact Data</li> <li>● Your consent</li> </ul>	<ul style="list-style-type: none"> <li>● Article 6(1)(a) - consent</li> </ul>	<ul style="list-style-type: none"> <li>● We will store your Contact and Identity Data for four years.</li> </ul>
<p>Video call or telephone call with a member of staff, to engage in a respectful and honest conversation about your religious beliefs and perception of the world around you.</p> <p>Details of this conversation will be recorded anonymously in the God Test App for the following purposes:</p> <ul style="list-style-type: none"> <li>● To demonstrate how different beliefs are dominant in different countries; and</li> <li>● To develop an understanding of different cultures, and how to listen, learn and love those that are different from you.</li> </ul>	<ul style="list-style-type: none"> <li>● Identity Data</li> <li>● Contact Data</li>   <li>● Special category data</li> </ul>	<ul style="list-style-type: none"> <li>● Article 9(2)(a) - explicit consent</li> <li>● Article 6(1)(a)- consent</li> <li>● Article 9(2)(a)- explicit consent</li>   <li>● Article 89(1)- research and statistics</li> </ul>	<ul style="list-style-type: none"> <li>● Identity and Contact data, four years.</li>   <li>● Special category data: When completing the God Test, personal data will be anonymised and retained indefinitely or until they are no longer needed for research.</li> </ul>
<p>To schedule follow up conversations with a member of staff or to meet in person.</p>	<ul style="list-style-type: none"> <li>● Identity</li> <li>● Contact</li> <li>● Special category data</li> </ul>	<ul style="list-style-type: none"> <li>● Article 6(1)(a) GDPR- consent</li> <li>● Article 9(2)(a)GDPR - explicit consent</li> </ul>	<ul style="list-style-type: none"> <li>● Four years after the final conversation.</li> </ul>

<p>To manage our relationship with you which will include:</p> <p>(a) Notifying you about changes to our terms or privacy policy</p> <p>(b) to deal with any compliments or complaints that we receive</p>	<ul style="list-style-type: none"> <li>● Identity</li> <li>● Contact</li> </ul>	<ul style="list-style-type: none"> <li>● Article 6(1)(c) - Necessary to comply with a legal obligation</li> <li>● Article 6(1)(f)- Necessary for our legitimate interests (to keep our records updated and to study how visitors use our services)</li> </ul>	<ul style="list-style-type: none"> <li>● We will notify you about changes to our terms or privacy policy for up to four years unless you choose to unsubscribe</li> <li>● We will keep records of compliments or complaints for up to four years</li> </ul>
<p>To administer and protect our organisation and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)</p> <p>To use data analytics to improve our website, products/services, marketing, customer relationships and experiences</p>	<ul style="list-style-type: none"> <li>● Technical</li> <li>● Usage</li> </ul>	<ul style="list-style-type: none"> <li>● Article 6(1)(f)- Necessary for our legitimate interests (to define types of customers for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)</li> <li>● Article 6(1)(f)- Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise)</li> <li>● Article 6(1)(c)- Necessary to comply with a legal obligation</li> </ul>	<ul style="list-style-type: none"> <li>● Four years</li> </ul>
<p>Responding to any data rights requests or data protection queries or complaints.</p>	<ul style="list-style-type: none"> <li>● Identity</li> <li>● Contact</li> <li>● Profile</li> <li>● Special category data</li> </ul>	<ul style="list-style-type: none"> <li>● Compliance with a legal obligation</li> </ul>	<ul style="list-style-type: none"> <li>● Four years</li> </ul>

## 5. Change of purpose

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

## 6. Disclosures of your personal data

Your personal information will be treated as strictly confidential and will only be shared with staff and volunteers of the organisation in order to carry out a service or for purposes connected with the organisation and with your permission to do so.

We do not disclose your personal data to any third party, with the exceptions of our secure and GDPR compliant service providers and Contact Relationship Management System (“CRM”), Bitrix 24. Our CRM is essential for carrying out our service and without it, we would not be able to operate at the capacity we do. By providing us with your details, you are giving us expressed permission to store your personal data in Bitrix 24. The contact form on our website runs within Bitrix 24 and thus when that form is submitted, the data goes directly into Bitrix 24..

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions. A link to Bitrix 24’s security statement is available below:

<https://www.bitrix24.com/security/>

We will only share your data with other external third parties with your explicit consent; unless the law requires or permits us to do so.

## 7. International transfers

We will endeavour not to transfer your personal data outside the European Economic Area (**EEA**), as much as possible.

## 8. Data security

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, volunteers, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions, and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

## 9. Data retention

### How long will you use my personal data for?

We will only retain your personal data for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory or reporting requirements (“Retention Period”). We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

To determine the appropriate retention period for personal data, we consider the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal, regulatory or other requirements.

[Details of Retention Periods](#) for different aspects of your personal data are set out in the table *Purposes for which we will use your personal data*.

## YOUR LEGAL RIGHTS

Under certain circumstances, you have rights under data protection laws in relation to your personal data. For more information see “Your Legal Rights” below. These include:

- *Request access to your personal data.*
- *Request correction of your personal data.*
- *Request erasure of your personal data.*
- *Object to processing of your personal data.*
- *Request restriction of processing your personal data.*
- *Request transfer of your personal data.*
- *Right to withdraw consent.*

If you wish to exercise any of the rights set out above, please contact our DPO using the details listed above.

### 1. No fee usually required

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we could refuse to comply with your request in these circumstances.

### 2. What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

### 3. Time limit to respond

We try to respond to all legitimate requests within one month. Occasionally it could take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

### 4. Your legal rights

You have the right to:

**Request access** to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.

**Request correction** of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.

**Request erasure** of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

**Object to processing** of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

**Request restriction of processing** of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios:

- If you want us to establish the data's accuracy.
- Where our use of the data is unlawful but you do not want us to erase it.
- Where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims.
- You have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

**Request the transfer** of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

**Withdraw consent at any time** where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your

consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

**Your Right to Complain** - You have the right to make a complaint at any time to the Data Protection Commissioner, the Icelandic supervisory authority for data protection issues. We would, however, appreciate the chance to deal with your concerns before you approach the DPC so please contact us in the first instance.

Data Protection Commissioner - Helga Þórisdóttir

Address: Rauðarárstígur 10, 105 Reykjavík, Iceland.

Tel. +354 510 9600

E-mail: [postur@personuvernd.is](mailto:postur@personuvernd.is)

## VERSION HISTORY

Version	Date	Description
1.0	2020-09-22	First version.