

# Privacy policy

ClientEarth (hereafter 'we' or 'us') take your privacy very seriously and would advise you to read this Privacy Notice closely. This Privacy Notice may change from time to time, so please check it frequently.

This Privacy Notice sets out how your personal data will be processed as controlled by ClientEarth, 34 Drayton Park. London, N5 1PB.

We only collect basic personal information from visitors to this website through the use of online forms and when you email us. We may also process your personal data as you provide directly to us or as we receive from our trusted partners in the charity sector.

## **This Privacy and Cookie Notice outlines:**

- What data we collect
- How we use it
- How long we keep it
- Where we transfer and store it
- Our use of cookies
- Your rights
- Further information

If you have any queries regarding this policy or the use of your personal information, please contact us at: [info@clientearth.org](mailto:info@clientearth.org)

## **What data we collect**

### **Communications**

We use your personal data to improve the user experience of our website and provide a better service. We also use it for staying in touch with you. By signing up to our newsletters and updates you agree to be contacted with such information. We may also receive your personal data through our trusted partners in the charity sector, including the British Lung Foundation, which we may also use to notify you of any updates on our campaigns.

Additionally, we may also use your information collected through the submission of various forms through our website, or from signing up at our events or other direct contact with you, to invite you to give donations or otherwise contribute to our work.

We may hold the following personal data:

- Full name
- Email address
- Country
- Address
- Payment details
- Phone number
- Company name
- Job title
- IP address
- Gender
- Date of birth
- Areas of interest

We will process this data on the basis of your consent in signing up to our newsletters and updates and/or our legitimate interest in informing you of our campaigns. You are able to opt out from emails at any time via the 'unsubscribe' link present at the bottom of every email communication we send. We will contact you in relation to services we feel will be useful for you by email or by phone.

When you engage with us directly in relation to certain campaigns, we may also process any data that you provide us in relation to the campaign. This will include, for example, on our Healthy Air Campaign, any data on your medical conditions, and may include personal data relating to your children. We will process such data on the basis of your consent and/or our legitimate interest in researching our advocacy projects.

**Pensions Campaign**

When you engage directly in relation to our pensions campaign, we will collect additional personal information and information relating to your pension provider and their climate policies.

We will only collect this information as you provide it to us through forms on our website and third-party platforms.

We will use the information you provide through our online forms related to your pension provider to analyse the provider's climate policies and support our legal work.

The data we hold includes:

- Whether you have a pension
- Who your pension provider is
- The responses provided by your pension provider
- Company name

We will process this data on the basis of your consent in signing up to our pensions campaign and completing our online forms. If you provide us with additional information that we do not require for the purposes outlined above, we will inform you of this fact and delete the data.

#### **Recruitment/HR**

We will also process any data you send us for recruitment purposes in relation to any vacancies that we advertise. We process this with your consent and/or our legitimate interest in researching our candidates and offering them new positions.

This will include:

- Full name
- Email address
- Telephone number
- Employment history
- Sensitive personal data, including racial, ethnic, sexual, religious and/or disability information

- Any other details in your CV

We process this data on the basis of your consent. We may also process additional data later on in the recruitment process, which will be processed on the basis of your consent and/or employment contract, or where we have a legal obligation or it is in the public interest to do so (such as for immigration or diversity monitoring purposes). This will be further detailed in your employment contract.

### **Fundraising**

We may also process your data in relation to grants and fundraising, where you donate to us or we think you may be interested in donating to us. We will collect this data either from you directly, from our trusted partners in the charity sector, or from publicly available sources.

This data will include:

- Full name
- Marital status
- Gender
- Date of birth
- Address
- Email address
- Telephone number
- Dietary requirements
- Family members' details
- Funding history
- GiftAid information
- Education and career information

We will process this data on the basis of your consent and/or our legitimate interest in receiving fundraising as a charity, which may include evaluating your suitability to donate to us. We may use this data to contact you in relation to donations on the

basis of your consent or our legitimate interest where we have an existing relationship with you. We may also use such data for our contractual and/or legal obligations in reporting on our donations.

#### **Online Donations**

Online donations to ClientEarth are processed by specialist third party service providers, who are under contract with ClientEarth and who are acting on ClientEarth's behalf.

We may use the following payment processors to process your donations:

[Stripe](#) – You can read their privacy policy here.

[Paypal](#) – You can read their privacy policy here

[Apple Pay](#) – You can read their privacy policy here

[Rapidata](#) – You can read their privacy policy here.

[Online Express](#) – You can read their privacy policy here.

[CAFDonate](#) – You can read their privacy policy here.

When a payment is processed by our service provider acting on ClientEarth's behalf, payment information is collected by the specialist third party service provider over a secure link and protected by industry standard software. ClientEarth itself does not collect any payment information (such as payment card details) and such payment information submitted by you when making a donation is not made available to ClientEarth. Our specialist third party payment service providers will use the information you provide to process your donation.

However, we may also process certain personal data in relation to donations that you make through various forms on our website, or using websites such as Rapidata to setup a regular gift.

This will include:

- Full name
- Address
- Email address
- Telephone number

We process this data on the basis of your consent in providing you updates on our work and may occasionally ask you if you would like to donate further to us.

## **How long we keep it**

### **Communications**

We will keep your personal data received when you sign up to our updates for the duration of your relationship with us or as long as you are in contact with us, and up to two years after. We will consider you to be in contact with us when you open our emails or take further actions through our web resources.

### **Pensions Campaign**

We will keep data you send in relation to our Pensions campaign for the duration of the campaign and up to one year after.

### **Fundraising**

We will keep your personal data for the duration of your relationship with us or as long as you are in contact with us, and up to two years after. Financial information may be kept for up to six years for legal purposes.

### **Online Donations**

We will hold any data that we receive when you make an online donation, as outlined above, for two years, to contact you in relation to your donation, with your consent.

### **Recruitment/HR**

We will keep data you send us in relation to vacancies for the duration of your application and up to one year after in order to offer you new opportunities, unless you opt out of this, or extend this period with your consent. We may also hold it for longer if your application is successful.

### **Where we transfer and store it**

In addition to on our systems, the information that you provide to us may be stored in secure servers which are operated by trusted providers. We may also transfer your personal data – that may include name, address, email address, mobile phone number, date of birth – to our partners in the charity sector, all of which are based in the European Economic Area (EEA), for the purposes of communicating with you.

We oblige all of our partners to sign contracts with us that clearly set out their commitment to respecting your Individual Rights, protecting your personal data – including not using it for any purpose other than for the agreed purposes – and their commitments to assisting us to help you exercise your Individual Rights.

Our trusted cloud providers, which we may use to store your personal data, include Mailchimp, Blackbaud, SurveyMonkey and Typeform. Mailchimp, Blackbaud, SurveyMonkey and Typeform use servers based in the United States of America. They are all certified under the EU-U.S. Privacy Shield certification, which allows us to legally transfer your personal data to them.

You can view Mailchimp's Privacy Policy [here](#), Blackbaud's Privacy Policy [here](#), SurveyMonkey's Privacy Policy [here](#), and Typeform's Privacy Policy [here](#).

## Our use of Cookies

At ClientEarth, we use cookies to allow us to personalise your visits to this site, keep track of your preferences and learn about the way you use the site.

A cookie is a small text file that is downloaded onto your computer when you visit our website and allows us to recognise you as a user. Typically, these contain two pieces of information: a site name and unique user ID. All information these cookies collect is aggregated and anonymous. Cookies are essential to the effective operation of our website. Cookies make the interaction between you and the website faster and easier. Cookies may also be set by the website you are visiting (first party cookies) or they may be set by other websites who run content on the page you are viewing (third party cookies).

ClientEarth uses cookies:

- That are strictly necessary to enable you to move around our websites or to provide certain basic features
- To enhance the functionality of the website by storing your preferences
- To help improve the performance of our website on your device

We require you to accept or decline certain cookies by accepting or declining our Cookie Consent Notice when first accessing our website. By accepting and using our websites you consent to our use of cookies as updated from time to time and the cookies we use will be stored on your device (unless this functionality is rejected or disabled by your browser). You may access our Cookie Consent Notice to decline cookies at any time subsequently.

Additionally, you may delete and block all cookies from any website, within your web browser settings if necessary. Please be aware that restricting or deleting cookies will impact on the functionality of the site.

Non-Essential Cookies: A list of the non-essential cookies we use on the website are detailed below. These cookies collect information about how you use our website. This may also include your use of social media, e.g. Facebook etc.

ClientEarth uses non-essential cookies to:

- Understand how you interact with our website
- Provide customised content and advertising
- Show you relevant content elsewhere on the internet e.g. Facebook. This may also include ways you can support us.

Google Analytics: analytics.js (\_\_ga, \_gat), used by Google to generate web analytics and for tracking how you use the website, compiling reports on website activity for website operators and providing other services relating to website activity and internet usage. The information generated by the cookie will be forwarded to Google servers in the U.S. for statistical analysis purposes only.

Google Adwords: Using Google Adwords code we are able to see which pages helped to lead to contact form submissions. This allows us to make better use of our paid search budget.

Youtube/Vimeo: We embed videos from our official YouTube and Vimeo channel using a privacy-enhanced mode. This mode may set cookies on your computer once you click on the YouTube video player, but YouTube will not store personally – identifiable cookie information for playbacks of embedded videos using the privacy-enhanced mode.

Hotjar: We use [Hotjar](#) in order to better understand our users' needs and to optimize this service and experience. Hotjar is a technology service that helps us better understand our users experience (e.g. how much time they spend on which pages, which links they choose to click, what users do and don't like, etc.) and this enables us to build and maintain our service with user feedback. Hotjar uses cookies and other technologies to collect data on our users' behavior and their devices (in particular device's IP address (captured and stored only in anonymized form), device screen size, device type (unique device identifiers), browser information, geographic location (country only), preferred language used to display our website). Hotjar stores this information in a pseudonymized user profile. Neither Hotjar nor we will ever use this information to identify individual users or to match it with further data on an individual user. For further details, please see Hotjar's privacy policy by clicking on this [link](#).

You can opt-out to the creation of a user profile, Hotjar's storing of data about your usage of our site and Hotjar's use of tracking cookies on other websites by following this [opt-out link](#).



Facebook: Facebook uses cookies and other technologies to collect information on how you interact with our site. We are able to use this information to show ads and make recommendations to you if we believe you may be interested in our work or supporting our work. For more information, please see Facebook's cookies policy by clicking [here](#).

### **Pixel tags**

A pixel tag is an invisible tag placed on certain pages of a website, which enables cookies to be downloaded to your browser. Pixel tags register when a particular computer and/or mobile device visits a particular page, allowing a particular user to be identified across various sites, and for targeted adverts to be served to that user across the various websites he/she visits.

Controlling pixel tags: Pixel tags are not stored on your computer or mobile device. If you disable cookies, the pixel tag will only detect an anonymous website visit.

Facebook pixel code: Facebook pixel code is a tracking pixel which matches users anonymously with their Facebook ID, enabling re-marketing, analysis, and reporting of our advertising campaigns. For details on these cookies, please view the Facebook Cookie Policy provided at: <https://www.facebook.com/policies/cookies/>

### **Hashed lists, social media and web advertising**

We may share your personal data for the purpose of targeted marketing for our campaigning and fundraising activities through Facebook advertising so that they can determine whether you are a registered account holder with them. Our adverts may then appear when you access Facebook. We may also share your personal data as part of an exclusion list for our ad campaigns, which helps us target new people for ClientEarth, rather than targeting people who have already engaged with us.

When sharing information with Facebook we will upload "hashed" personal information to Facebook Ads Manager. Facebook then matches the hashed personal data with Facebook profiles on in their database, which will create a Lookalike audience. The process of "hashing" is commonly used in digital advertising to convert directly identifiable personal data to pseudonymous personal data for the purposes of security and privacy during data transfer. The hashed data that we share with social media platforms is deleted after between 15 mins and a few hours (subject to database size) and not used for any other purpose.

We may also use social media platform advertising tools to build audiences matching particular characteristics to serve our advertising campaigns. For example, we might target people who have shown an interest in climate change or deforestation. This targeting is based on pages and/or posts people have previously engaged with on the platform. These tools allow us to inspire new people to engage with our work, and help us spread awareness about the issues facing our planet.

If you wish to prevent this use of your data then you can adjust your settings via the social media site ( <https://www.facebook.com/help/568137493302217>)

The data we send could include your name, email address, telephone number and postal address.

Please note that we may share your personal data in a similar way with other social media platforms without further notification provided we assess any new online platform as having similar functioning to Facebook as well as having the required privacy standards and protocols in place to handle this data. Where the functioning of the new social media platforms or the privacy standards and protocols in place are not sufficiently similar we will notify you of any changes to our privacy policy in this respect.

Using online platforms in this way is the most efficient way for us to reach more people who are likely to take an interest in our work, meaning we use our funds most effectively.

#### **Other Third Party Cookies**

We have also included a number of features, which allow our users to share some of our content via Facebook. This does not set a cookie by itself, but if one is present it will read it. Another service we use is provided through MailChimp, which helps us to design email newsletters, share them on social networks and integrate with our other services. ClientEarth doesn't have direct access to those cookies and the use of those third-party cookies is governed solely by the respective service provider's Privacy statement.

**Storage Time:** The cookies are stored for a period of two years unless you clear their cache and the cookies themselves.

#### **Your Individual Rights**

You have several individual rights in relation to your personal data that we collect, which we are committed to respecting. In particular, you have the right to:

- Request a copy of your personal information
- Request any inaccuracies in your personal information be corrected
- You may also ask to object or restrict the processing of your personal data and have your personal information erased, where appropriate.

Additionally, where we collect your personal details for sending you newsletters, campaigns or updates related to our work, or requests for donations, you have the right at any time to notify us that you no longer want to receive this information.

If you wish to raise a complaint on how we have handled your personal data, you can contact our office at [info@clientearth.org](mailto:info@clientearth.org) and we will investigate the matter.

### **Opting Out of Cookies**

You can manage the cookies stored on your device as well as stop cookies from being installed on your browser. For more information on how to manage cookies usage on your device, please let us refer you to information found on these topics on [allaboutcookies.org](http://allaboutcookies.org), more specifically by clicking on the links below:

[Managing the Cookies Stored on Your Device](#)

[Stop Cookies from Being Installed on your Browser](#)

Please note that if you prefer to block some or all of the cookies ClientEarth uses, you might lose some of our website's functionality.

You can choose to accept or opt out of cookies via our Cookie Consent Notice.

### **Data Security**

ClientEarth uses reasonable administrative, technical, personnel and physical measures to safeguard personal information in its possession against loss, theft and unauthorised use or modification. While we strive to protect your personal information, you will understand that we cannot guarantee the security of any information transmitted to us over the internet. Therefore, please do not submit personal information to us online unless you accept the security risks of doing so.

## **Modifications and changes to this Privacy Notice**

This Privacy Notice was last updated on 5 June 2020. Any changes made to this Privacy Notice will be updated on our website and you will be notified by email if necessary and appropriate.

### **Change log**

5 Aug 2021:

- Added additional information on use of Facebook Pixels, hashed lists and Facebook advertising

7 June 2021:

- Changed ClientEarth address from Fieldworks, 274 Richmond Road, London E8 3QW to: 34 Drayton Park, London, N5 1PB

6 June 2020:

- Added information on use of Typeform and SurveyMonkey
- Added information on how and why we process data as part of the Pensions Campaign

12 November 2019:

- Added information on use of Facebook pixel
- Updated subscriber re-consent conditions
- Added information about payment processors (Stripe, Rapidata)