



Privacy and Data Security Policy

Capitals Coalition Community: March 2021



The Capitals Coalition is a collaboration formed by many different organizations from around the world and as such relationships and trust are of the utmost importance and fundamental to our purpose. That is why we are committed to protecting and respecting your privacy. This policy explains when and why we collect personal information, and how we use and store it.

If you have any questions, please contact the Coalition via e-mail on info@capitalscoalition.org.

Stichting Capitals Coalition

RSIN Number: 860780375

KVK Number: 76727149

Bezuidenhoutseweg 2,

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Netherlands

Who we are

The Capitals Coalition started as a project hosted by the ICAEW (Institute of Chartered Accountants in England and Wales). From January 2020, the Coalition is a registered Stichting in the Netherlands, uniting the Natural Capital Coalition and the Social & Human Coalition. ICAEW continues to provide services to the Coalition such as IT services and office space. We have an independent board that is responsible for the strategy of the Coalition and an advisory panel made up of experts in natural, social and human capital to support this <https://capitalscoalition.org/legal/>

The community is an online networking space as well as an area to share knowledge, experience, case studies, reports, challenges, solutions and opportunities. The community is available here <https://community.capitalscoalition.org/>

The Coalition uses a Platform called 'Hivebrite', which enables the import and export of user lists and data, the management of content and events, the organization of emailing campaigns and opportunity research and sharing as well as, where relevant, the management of funds and contributions of any kind.

In this regard, the Coalition collects and processes your personal data in accordance with this Privacy policy and [Cookie policy](#).

We are particularly aware and sensitive with regards to the respect of your privacy and personal data protection. We commit to ensuring the compliance of the processing we carry out as data controller in accordance with the Data Protection Law.

Data Protection Law is the Dutch GDPR Implementation Act (2018).

We have put in place an appropriate privacy and cookie policy to be fully transparent on how your personal data is processed within the use of the Platform and services provided.

This privacy policy is intended for the users of the community.

For all queries relating to privacy and data protection the Operations Director can be contacted at the following address: info@capitalscoalition.org

How do we collect information from you?

When subscribing to the community we let you know that the following personal data is collected for the purpose of creating a user account:

Mandatory data

- First name
- Last name
- Organization
- Email address
- Industry
- Stakeholder group
- Location to city level
- Where are you on your capitals journey
- Where you heard about the Capitals Coalition

Optional data

- Information regarding professional experience, skills and additional contact details.

We tell users that it is not possible to access the Platform without providing the mandatory data strictly necessary to create an account and authenticate you as the User.

During the use of the Platform

You may publish on your own initiative any content on the community which will be kept by the Coalition:

- Posts
- Events
- Opportunities

Please be aware that when using the Platform, you may decide to provide sensitive data within the meaning of Data Protection Law, for example, data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, concerning sexual orientation, etc. By providing such sensitive data, you agree to their processing by the Platform in the conditions set forth in this Privacy Policy.

Why do we collect information from you (purpose)?

We collect, process and host personal data that you freely transfer as a User when accessing the Capitals Coalition Community. We only collect data that is important to your use of the site.

Purpose	Legal basis
Creation and management of a user account	Consent Performance of the agreement with you to use the Platform
Providing the User with all functionalities of the Platform, meaning: <ul style="list-style-type: none"> ● Sending invitations for events organized by the Coalition or other Users, if the User has accepted to receive such invitations; ● Sending opportunities including jobs from the Coalition or its partners if the User has accepted to receive such offers. ● Inviting the User to events organized by the Community if the User has accepted to receive such invitations. ● Sending updates on Community activity if the User has accepted to receive such information. 	
Management of data subjects rights according to the Personal Data Legislation. Storage of User personal data;	
Making statistics in order: <ul style="list-style-type: none"> ● to improve the quality of the services proposed by the Platform; ● improve the usage functionalities of the Platform; 	
Making statistics regarding the effective use of the Platform;	
Making statistics regarding the different levels of activity on the Platform.	

How is your information used & stored and how long is it retained?

The personal data related to your account is retained only during your membership of the Platform.

Following the termination of your membership, the data collected when you joined as well as the content published by you on the Platform will be deleted after a period of two (2) years. This is to allow an account to be reactivated if requested and to allow accurate analysis of use of the platform.

Your data is stored in the European Economic Area (EEA) by the Coalition and its trusted service providers. However, depending on the processing, your data may also be transferred to a country outside the EEA to our trusted service providers.

When transferring data outside the EEA, we ensure that the data is transferred in a secured manner and with respect to the Data Protection Law. When the country where the data are transferred does not have a protection comparable to that of the EU, the Data Controller uses “appropriate or suitable safeguards”.

When the service providers to whom personal data are transferred, are located in the United States, these transfers are governed by the standard data protection clauses adopted by the Commission.

For more information please contact the Operations Director via info@capitalscoalition.org

What is our commitment to you?

The Data Controller commits to process your personal data in compliance the Data Protection Law and undertakes to, notably, respect the following principles:

- We will process your personal data lawfully, fairly, and in a transparent manner;
- Only collect and process your data for the strict purpose as described in this privacy policy;
- Ensure that the personal data processed are adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed;
- Do our best to ensure that the personal data processed are accurate and, if necessary, kept up to date and take all reasonable steps to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay;
- Keep your data for no longer than is necessary for the purposes for which they are processed;
- Put in place all necessary technical and organizational appropriate measures in order to ensure the security, confidentiality, integrity, availability and the resilience of the process systems and services;
- Limit the access to the your data to the persons duly authorized to this effect;
- Guarantee your rights under the Data Protection Law in relation to the processing of your data and make the best efforts to satisfy any request, where this is possible.

Who will your information be shared with?

Only authorized persons working for the Coalition can access your personal data. We make every effort to ensure that these groups of people remain as small as possible and maintain the confidentiality and security of your personal data.

We also use trusted service providers to carry out a set of operations on our behalf for hosting. We can also use service providers in the tech industry, editors of specific tools integrated in the Platform for technical purposes.

We only provide service providers with the information they need to perform the service and ask them not to use your personal data for any other purpose. We do our best to ensure that all these trusted service providers only process the personal data on our documented instructions and provide sufficient guarantees, in particular in terms of confidentiality, expert knowledge, reliability and resources, to implement technical and organizational measures which will meet the requirements of the applicable legislation, including for the security of processing.

We may be required to disclose or share your personal data to comply with a legal obligation, or to enforce or apply our terms of use/sale or any other conditions you have accepted; or to protect the rights, safety or property of Capitals Coalition, its customers or employees.

The Coalition will never share/sell your information to third parties for marketing purposes or for any reasons other than described here.

These are the main service providers:

Service provider	Nature of service
KIT UNITED 44 rue la fayette 75009 Paris France	Hivebrite solution You can consult the privacy policy by clicking on the following link: https://hivebrite.com/privacy-policy
Google Cloud Platform Gordon House, 4 Barrow St, Dublin, Ireland	Hosting of all data and content produced / provided by the User, as well as images, profile pictures and backups https://cloud.google.com/security/privacy/
Amazon AWS 38 avenue John F. Kennedy, L-1855, Luxembourg	 https://aws.amazon.com/compliance/gdpr-center/
Sentry 132 Hawthorne Street San Francisco, CA 94107 USA	Production and storage of error logs enabling our developers to correct the code https://sentry.io/privacy/
Sendgrid 375 Beale Street, Suite 300, San Francisco, CA 94105 USA	Sending of emails from the Platform https://api.sendgrid.com/privacy.html
Hivebrite, Inc. 16 Nassau St, New York, NY 10038, USA	Customer support for the Platform https://hivebrite.com/privacy-policy

Your rights

Data protection laws give you a number of rights with respect to how organizations process your personal data.

Right to be Informed: You have the right to be informed of the use that your Personal Data will be put to, along with details of the Data Controller and your rights. Where you provide your Personal Data directly to the Capitals Coalition these details will be made available at the time your data is obtained.

Right to Access: You have the right to access and obtain a copy of your Personal Data held and processed by the Coalition, on request.

You can exercise this right through the submission of a formal, written Subject Access Request to info@capitalscoalition.org.

Right to Rectification: You have the right to request the Coalition to correct inaccurate or incomplete Personal Data.

Right to Erasure (to be Forgotten): You have the right to request the Coalition to erase your Personal Data from its systems and records.

Right to Restrict Processing: You have the right to request the Coalition to stop or restrict the processing of your Personal Data. This could be for example, if your Personal Data is no longer necessary for purpose of processing. When processing is based on your consent, you can withdraw consent at any time without affecting the lawfulness of the processing based on consent before its withdrawal.

Right to data portability: You have the right to request a copy, in a portable format, of the Personal Data which you have provided directly to the Coalition.

Right to object: You have the right to object to the processing of your Personal Data, where the Coalition relies upon Legitimate Interest as the lawful basis for processing.

We may charge a small fee to cover the administrative costs associated with completing your request.

In addition, in the event the User considers that its rights have not been respected, the User of which the personal data is collected can lodge a complaint before the competent supervisory authority. For any additional information, you can review your rights on the websites of the competent authorities.

The competent supervisory authorities are listed on the following website:

http://ec.europa.eu/justice/article-29/structure/data-protection-authorities/index_en.htm.

Data protection office

Capitals Coalition fully complies with the Dutch GDPR Implementation Act (2018). For all queries related to data protection please contact the Coalition's designated data protection lead: Mary Dawson mary.dawson@capitalscoalition.org

Changes to this Privacy Policy



We keep our privacy notice under regular review. The policy may be periodically updated. If there are significant changes to this policy, we will contact you directly through the appropriate means. This privacy policy was last updated on 15 March 2021.

Use of cookies

The Data Controller informs the User that Hivebrite, as well as its subcontractors, uses a tracking technology on its terminal such as cookies whenever the User navigates on the Platform subject to the conditions described in the Data Controller [Cookie Policy](#)

Links to other websites

The Platform may contain links to other organizations' information and websites. The Coalition is not responsible for the information or activities of other organizations, even if accessed via the community. It is recommended that you check the privacy policy of websites you visit that are linked through the Community.