

Privacy Policy

This Privacy Policy sets out how we, Eastern European Mission, collect, store and use information about you when you use or interact with our website, www.eemeurope.org (our website) and where we otherwise obtain or collect information about you. This Privacy Policy is effective starting December 16, 2020.

Summary

This section summarizes how we obtain, store and use information about you. It is intended to provide a very general overview only. **It is not complete in and of itself and it must be read in conjunction with the corresponding full sections of this Privacy Policy.**

- **Data controller:** Kathy Knox
- **How we collect or obtain information about you:**
 - when you provide it to us (e.g. by contacting us and/or placing an order on our website, and
 - from your use of our website, using cookies.
- **Information we collect:** name, contact details, IP address, information from cookies, information about your computer or device (e.g. device and browser type), information about how you use our website (e.g. which pages you have viewed, the time when you view them and what you clicked on, the geographical location from which you accessed our website (based on your IP address), and, if you are placing an order on our website, your phone number.
- **How we use your information:** for administrative and business purposes, particularly to contact you and process orders you place on our website, to analyze your use of our website, to improve our business and website, to fulfill our contractual obligations, and in connection with our legal rights and obligations.
- **Disclosure of your information to third parties:** only to the extent necessary to run our business, to our service providers, and to fulfill any contracts we enter into with you.
- **Do we sell your information to third parties** (other than in the course of a business sale or purchase or similar event): No.
- **How long we retain your information:** for no longer than necessary, taking into account any legal obligations we have (e.g. to maintain records for tax purposes), and any other legal basis we have for using your information (e.g. your consent, performance of a contract with you or our legitimate interests as a business). For specific retention periods in relation to certain information which we collect from you, please see the main section below entitled How long we retain your information.
- **How we secure your information:** using appropriate technical and organizational measures such as storing your information on secure servers, encrypting transfers of data to or from our servers using Secure Sockets Layer (SSL) technology, only granting access to your information where necessary, etc.
- **Use of cookies:** we use cookies on our website including essential, functional, and analytical cookies. For more information, please visit our cookies policy.
- **Transfers of your information outside the European Economic Area:** we transfer your information outside of the European Economic Area, specifically to the United States of America. If the fulfillment of your order necessitates shipment from one of our partners (affiliated non-profits) in Russia, Serbia, and/or Ukraine, in such case

only your information will be transferred to that respective country for the sole purpose of fulfilling your order. Where we do so, we will ensure appropriate safeguards are in place.

- **Use of automated decision making and profiling:** we do not use automated decision making and/or profiling.
- Your rights in relation to your information
 - to access your information and to receive information about its use
 - to have your information corrected and/or completed
 - to have your information deleted
 - to restrict the use of your information
 - to receive your information in a portable format
 - to object to the use of your information
 - to withdraw your consent to the use of your information
 - to complain to a supervisory authority
- **Sensitive personal information:** we do not knowingly or intentionally collect what is commonly referred to as 'sensitive personal information'. Please do not submit sensitive personal information about you to us. For more information, please see the main section below entitled Sensitive Personal Information.

Our details

The data controller in respect of our website is Kathy Knox. You can contact the data controller by writing to Eastern European Mission, PO Box 55245 Hurst, Texas 76054 (USA) or sending an email to privacy@eem.org.

If you have any questions about this Privacy Policy, please contact the data controller.

Information we collect when you visit our website

We collect and use information from website visitors in accordance with this section and the section entitled Disclosure and additional uses of your information.

Web server log information

We use a third party server to host our website called Liquid Web, the privacy policy of which is available [here](#).

Our website server automatically logs the IP address you use to access our website as well as other information about your visit such as the pages accessed, information requested, the date and time of the request, the source of your access to our website (e.g. the website or URL (link) which referred you to our website), and your browser version and operating system.

Our server is located in the USA and, accordingly, your information is transferred outside the European Economic Area (EEA). For further information and information on the safeguards used, please see the section of this privacy policy entitled Transfers of your information outside the European Economic Area.

Use of website server log information for IT security purposes

Our third party hosting provider collects and stores server logs to ensure network and IT security and to ensure that the server and website remain uncompromised. This includes

analyzing log files to help identify and prevent unauthorized access to our network, the distribution of malicious code, denial of services attacks and other cyber attacks, by detecting unusual or suspicious activity.

Unless we are investigating suspicious or potential criminal activity, we do not make, nor do we allow our hosting provider to make, any attempt to identify you from the information collected via server logs.

Legal basis for processing: compliance with a legal obligation to which we are subject (Article 6(1)(c) of the General Data Protection Regulation). **Legal obligation:** recording access to our website using server log files is an appropriate technical measure to ensure a level of security appropriate to protect information collect by our website under Article 32(1) of the General Data Protection Regulation.

Cookies

Cookies are data files which are sent from a website to a browser to record information about users for various purposes.

We use cookies on our website, including essential, functional, and analytical cookies. For further information on how we use cookies, please see our cookies policy which is available [here](#).

You can reject some or all of the cookies we use on or via our website by changing your browser settings, but doing so can impair your ability to use our website or some or all of its features. For further information about cookies, including how to change your browser settings, please visit www.allaboutcookies.org or see our cookies policy.

Information we collect when you contact us

We collect and use information from individuals who contact us in accordance with this section and the section entitled Disclosure and additional uses of your information.

Email

When you use email to communicate with us we collect your email address and any other information you provide in that email (such as your name, telephone number and the information contained in any signature block in your email).

Legal basis for processing: our legitimate interests (Article 6(1)(f) of the General Data Protection Regulation). **Legitimate interest(s):** responding to enquiries and messages we receive and keeping records of correspondence.

Legal basis for processing: necessary to perform a contract or to take steps at your request to enter into a contract (Article 6(1)(b) of the General Data Protection Regulation). **Reason why necessary to perform a contract:** where your message relates to us providing you with goods or services or taking steps at your request prior to providing you with our goods and services (for example, providing you with information about such goods and services), we will process your information in order to do so.

Transfer and storage of your information

We use a third party email provider to store emails you send us. Our third party email provider is Google Inc. Their privacy policy is available [here](#).

Emails you send us will be stored outside the European Economic Area on our third party email provider's servers in the United States of America. For further information please see

the section of this privacy policy entitled Transfers of your information outside the European Economic Area.

Contact form

When you contact us using our contact form, we collect your name, email address, and in some cases your phone number and address. We also collect any other information you provide to us when you complete the contact form.

If you do not provide the mandatory information required by our contact form, you will not be able to submit the contact form and we will not receive your enquiry.

Legal basis for processing: our legitimate interests (Article 6(1)(f) of the General Data Protection Regulation). **Legitimate interest(s):** responding to enquiries and messages we receive and keeping records of correspondence.

Legal basis for processing: necessary to perform a contract or to take steps at your request to enter into a contract (Article 6(1)(b) of the General Data Protection Regulation). **Reason why necessary to perform a contract:** where your message relates to us providing you with goods or services or taking steps at your request prior to providing you with our goods and services (for example, providing you with information about such goods and services), we will process your information in order to do so).

Transfer and storage of your information

Messages you send us via our contact form will be stored outside the European Economic Area on our third party email provider's servers in the United States. Our third party email provider is Google Inc. Their privacy policy is available [here](#).

For further information about the safeguards used when your information is transferred outside the European Economic Area, see the section of this privacy policy below entitled Transfers of your information outside the European Economic Area.

Post

If you contact us by post, we will collect any information you provide to us in any postal communications you send us.

Legal basis for processing: our legitimate interests (Article 6(1)(f) of the General Data Protection Regulation). **Legitimate interest(s):** responding to enquiries and messages we receive and keeping records of correspondence.

Legal basis for processing: necessary to perform a contract or to take steps at your request to enter into a contract (Article 6(1)(b) of the General Data Protection Regulation). **Reason why necessary to perform a contract:** where your message relates to us providing you with goods or services or taking steps at your request prior to providing you with our goods and services (for example, providing you with information about such goods and services), we will process your information in order to do so).

Information we collect when you interact with our website

We collect and use information from individuals who interact with particular features of our website in accordance with this section and the section entitled Disclosure and additional uses of your information.

Registering on our website

When you register and create an account on our website, we collect the following information:

- Name
- Email Address
- Shipping Address
- Phone Number

and any other information you provide to us when you complete the registration form.

If you do not provide the mandatory information required by the registration form, you will not be able to register or create an account on our website.

Legal basis for processing: necessary to perform a contract [or to take steps at your request prior to entering into a contract] (Article 6(1)(b) of the General Data Protection Regulation). **Reason why necessary to perform a contract:** creating an account on our website is necessary to allow you to access the goods and services you have ordered from us.

Transfer and storage of your information

Information you submit to us via the registration form on our website will be stored outside the European Economic Area on our third party hosting provider's servers in the USA. Our third party hosting provider is Liquid Web. Their privacy policy is available [here](#).

For further information about the safeguards used when your information is transferred outside the European Economic Area, see the section of this privacy policy below entitled Transfers of your information outside the European Economic Area.

Information we collect when you place an order on our website

We collect and use information from individuals who place an order on our website in accordance with this section and the section entitled Disclosure and additional uses of your information.

Information collected when you place an order

Mandatory information

When you place an order for goods or services on our website, we collect your name, email address, shipping address, and phone number.

If you do not provide this information, you will not be able to order goods from us on our website or enter into a contract with us.

Legal basis for processing: necessary to perform a contract (Article 6(1)(b) of the General Data Protection Regulation). **Reason why necessary to perform a contract:** we need the mandatory information collected by our checkout form to establish who the contract is with and to contact you to fulfil our obligations under the contract, including sending you receipts and order confirmations.

Information collected or obtained from third parties

This section sets out how we obtain or collect information about you from third parties.

Information received from third parties

Generally, we do not receive information about you from third parties.

Where we receive information about you in error

If we receive information about you from a third party in error and/or we do not have a legal basis for processing that information, we will delete your information.

Disclosure and additional uses of your information

This section sets out the circumstances under which we will disclose information about you to third parties and any additional purposes for which we use your information.

Disclosure of your information to service providers

We use a number of third parties to provide us with services which are necessary to run our business or to assist us with running our business and who process your information for us on our behalf. These include the following:

- Email provider, Google Inc. Their privacy policy is available [here](#).
- Hosting provider, Cloudways. Their privacy policy is available [here](#).
- Customer Relationship Management, Cloze CRM. Their privacy policy is available [here](#).
- Order fulfillment service provider, Megaventory Inc. Their privacy policy is available [here](#).

Your information will be shared with these service providers where necessary to provide you with the service you have requested, whether that is accessing our website or ordering goods and services from us.

Legal basis for processing: legitimate interests (Article 6(1)(f) of the General Data Protection Regulation). **Legitimate interest relied on:** where we share your information with these third parties in a context other than where it is necessary to perform a contract (or take steps at your request to do so), we will share your information with such third parties in order to allow us to run and manage our business efficiently.

Legal basis for processing: necessary to perform a contract and/or to take steps at your request prior to entering into a contract (Article 6(1)(b) of the General Data Protection Regulation). **Reason why necessary to perform a contract:** we may need to share information with our service providers to enable us to perform our obligations under that contract or to take the steps you have requested before we enter into a contract with you.

Disclosure of your information to other third parties

We disclose your information to other third parties in specific circumstances, as set out below.

Providing information to Google Inc. Google collects information through our use of Google Analytics on our website. Google uses this information, including IP addresses and information from cookies, for a number of purposes, such as improving its Google Analytics service. Information is shared with Google on an aggregated and anonymized basis. To find out more about what information Google collects, how it uses this information and how to control the information sent to Google, please check out [their page](#).

Legal basis for processing: our legitimate interests (Article 6(1)(f) of the General Data Protection Regulation). **Legitimate interest(s):** meeting our contractual obligations to Google under our Google Analytics Terms of Service.

You can opt out of Google Analytics by installing the browser plugin [here](#).

Sharing your information with third parties, which are either related to or associated with the running of our business, where it is necessary for us to do so. These third parties include our business partners, and independent contractors. Further information on each of these third parties is set out below.

Legal basis for processing: our legitimate interests (Article 6(1)(f) of the General Data Protection Regulation). **Legitimate interest:** running and managing our business efficiently.

Business partners

Business partners are businesses we work with which provide goods and services which are complementary to our own or which allow us to provide goods or services which we could not provide on our own. We share information with our business partners where you have requested services which they provide whether independently from, or in connection with or own services.

Independent contractors

We use independent contractors in our business. Your information will be shared with independent contractors only where it is necessary for them to perform the function we have hired them to perform in relation to our business.

Legal basis for processing: our legitimate interests (Article 6(1)(f) of the General Data Protection Regulation). **Legitimate interest:** running and managing our business effectively.

Disclosure and use of your information for legal reasons

Indicating possible criminal acts or threats to public security to a competent authority

If we suspect that criminal or potential criminal conduct has occurred, we will in certain circumstances need to contact an appropriate authority, such as the police. This could be the case, for instance, if we suspect that fraud or a cyber crime has been committed or if we receive threats or malicious communications towards us or third parties.

We will generally only need to process your information for this purpose if you were involved or affected by such an incident in some way.

Legal basis for processing: our legitimate interests (Article 6(1)(f) of the General Data Protection Regulation). **Legitimate interests:** preventing crime or suspected criminal activity (such as fraud).

In connection with a legal or potential legal dispute or proceedings

We may need to use your information if we are involved in a dispute with you or a third party for example, either to resolve the dispute or as part of any mediation, arbitration or court resolution or similar process.

Legal basis for processing: our legitimate interests (Article 6(1)(f) of the General Data Protection Regulation). **Legitimate interest(s):** resolving disputes and potential disputes.

For ongoing compliance with laws, regulations and other legal requirements

We will use and process your information in order to comply with legal obligations to which we are subject. For example, we may need to disclose your information pursuant to a court order or subpoena if we receive one.

Legal basis for processing: compliance with a legal obligation (Article 6(1)(c) of the General Data Protection Regulation). **Legal obligation(s):** legal obligations to disclose information which are part of the laws of the United States of America or if they have been integrated into the legal framework of the United States of America (for example in the form of an international agreement which the United States of America has signed).

Legal basis for processing: our legitimate interests (Article 6(1)(f) of the General Data Protection Regulation). **Legitimate interest:** where the legal obligations are part of the laws of another country and have not been integrated into the legal framework of the United States of America, we have a legitimate interest in complying with these obligations.

How long we retain your information

This section sets out how long we retain your information. We have set out specific retention periods where possible. Where that has not been possible, we have set out the criteria we use to determine the retention period.

Retention periods

Server log information: we retain information on our server logs for 4 weeks.

Order information: when you place an order for goods and services, we retain that information for a period up to five years in order to prevent fraud and/or abuse with respect to our Terms of Service.

Correspondence and inquiries: when you make an inquiry or correspond with us for any reason, whether by email or via our contact form or by phone, we will retain your information for as long as it takes to respond to and resolve your inquiry, and for no more than three months thereafter, after which point we will delete your information.

Criteria for determining retention periods

In any other circumstances, we will retain your information for no longer than necessary, taking into account the following:

- the purpose(s) and use of your information both now and in the future (such as whether it is necessary to continue to store that information in order to continue to perform our obligations under a contract with you or to contact you in the future);
- whether we have any legal obligation to continue to process your information (such as any record-keeping obligations imposed by relevant law or regulation);
- whether we have any legal basis to continue to process your information (such as your consent);
- how valuable your information is (both now and in the future);
- any relevant agreed industry practices on how long information should be retained;
- the levels of risk, cost and liability involved with us continuing to hold the information;
- how hard it is to ensure that the information can be kept up to date and accurate; and

- any relevant surrounding circumstances (such as the nature and status of our relationship with you).

How we secure your information

We take appropriate technical and organizational measures to secure your information and to protect it against unauthorized or unlawful use and accidental loss or destruction, including:

- only sharing and providing access to your information to the minimum extent necessary, subject to confidentiality restrictions where appropriate, and on an anonymized basis wherever possible;
- using secure servers to store your information;
- verifying the identity of any individual who requests access to information prior to granting them access to information;
- using Secure Sockets Layer (SSL) software to encrypt any information you submit to us via any forms on our website;
- only transferring your information via closed system or encrypted data transfers.

Transmission of information to us by email

Transmission of information over the internet is not entirely secure, and if you submit any information to us over the internet (whether by email, via our website or any other means), you do so entirely at your own risk.

We cannot be responsible for any costs, expenses, loss of profits, harm to reputation, damages, liabilities or any other form of loss or damage suffered by you as a result of your decision to transmit information to us by such means.

Transfers of your information outside the European Economic Area

Your information will be transferred and stored outside the European Economic Area (EEA) in the circumstances set out below. We will also transfer your information outside the EEA or to an international organization in order to comply with legal obligations to which we are subject (compliance with a court order, for example). Where we are required to do so, we will ensure appropriate safeguards and protections are in place.

Server log information

Information collected when you visit our website is transferred outside of the EEA and stored on the servers of our third party hosting company, Liquid Web. You can access their privacy policy [here](#).

Country of storage: United States of America. This country is not subject to an adequacy decision by the European Commission.

Safeguard(s) used: our third party hosting provider has self-certified its compliance with the EU-U.S. Privacy Shield.

Contact form

Information you submit to us via our contact form is transferred outside the EEA and stored on our third party hosting provider's servers. Our hosting provider is Google, Inc. .

Country of storage: United States of America. This country is not subject to an adequacy decision by the European Commission.

Safeguard(s) used: our third party hosting provider has self-certified its compliance with the EU-U.S. Privacy Shield.

Email

Information you submit to us by email is transferred outside the EEA and stored on our third party email provider's servers. Our third party email provider is Google, Inc.

Country of storage: United States of America. This country is not subject to an adequacy decision by the European Commission.

Safeguard(s) used: our third party email provider has self-certified its compliance with the EU-U.S. Privacy Shield.

Your rights in relation to your information

Subject to certain limitations on certain rights, you have the following rights in relation to your information, which you can exercise by writing to Eastern European Mission, PO Box 55245 Hurst, Texas 76054 (USA) or sending an email to privacy@eem.org:

- **to request access to your information** and information related to our use and processing of your information;
- to request the correction or deletion of your information;
- to request that we restrict our use of your information;
- **to receive information which you have provided to us in a structured, commonly used and machine-readable format** (e.g. a CSV file) and the right to have that information transferred to another data controller (including a third party data controller);
- **to object to the processing of your information for certain purposes** (for further information, see the section below entitled Your right to object to the processing of your information for certain purposes); and
- **to withdraw your consent to our use of your information** at any time where we rely on your consent to use or process that information. Please note that if you withdraw your consent, this will not affect the lawfulness of our use and processing of your information on the basis of your consent before the point in time when you withdraw your consent.

In accordance with Article 77 of the General Data Protection Regulation, you also have the right to lodge a complaint with a supervisory authority, in particular in the Member State of your habitual residence, place of work or of an alleged infringement of the General Data Protection Regulation.

Further information on your rights in relation to your personal data as an individual

You can also find out further information about your rights, as well as information on any limitations which apply to those rights, by reading the underlying legislation contained in Articles 12 to 22 and 34 of the General Data Protection Regulation, which is available [here](#).

Verifying your identity where you request access to your information

Where you request access to your information, we are required by law to use all reasonable measures to verify your identity before doing so.

These measures are designed to protect your information and to reduce the risk of identity fraud, identity theft or general unauthorised access to your information.

How we verify your identity

Where we possess appropriate information about you on file, we will attempt to verify your identity using that information.

If it is not possible to identify you from such information, or if we have insufficient information about you, we may require original or certified copies of certain documentation in order to be able to verify your identity before we are able to provide you with access to your information.

We will be able to confirm the precise information we require to verify your identity in your specific circumstances if and when you make such a request.

Your right to object to the processing of your information for certain purposes

You have the following rights in relation to your information, which you may exercise by writing to Eastern European Mission, PO Box 55245 Hurst, Texas 76054 (USA) or sending an email to privacy@eem.org:

- to object to us using or processing your information where we use or process it in order to **carry out a task in the public interest or for our legitimate interests**, including 'profiling' (i.e. analyzing or predicting your behavior based on your information) based on any of these purposes; and
- to object to us using or processing your information for **direct marketing purposes** (including any profiling we engage in that is related to such direct marketing).

For more information on how to object to our use of information collected from cookies and similar technologies, please see the section entitled How to accept or reject cookies in our cookies policy, which is available here.

Sensitive personal information

'Sensitive personal information' is information about an individual that reveals their racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, genetic information, biometric information for the purpose of uniquely identifying an individual, information concerning health or information concerning a natural person's sex life or sexual orientation.

We do not knowingly or intentionally collect sensitive personal information from individuals, and you must not submit sensitive personal information to us.

If, however, you inadvertently or intentionally transmit sensitive personal information to us, you will be considered to have explicitly consented to us processing that sensitive personal information under Article 9(2)(a) of the General Data Protection Regulation. We will use and process your sensitive personal information for the purposes of deleting it.

Changes to our Privacy Policy

We update and amend our Privacy Policy from time to time.

Minor changes to our Privacy Policy

Where we make minor changes to our Privacy Policy, we will update our Privacy Policy with a new effective date stated at the beginning of it. Our processing of your information will be governed by the practices set out in that new version of the Privacy Policy from its effective date onwards.

Major changes to our Privacy Policy or the purposes for which we process your information

Where we make major changes to our Privacy Policy or intend to use your information for a new purpose or a different purpose than the purposes for which we originally collected it, we will notify you by email (where possible) or by posting a notice on our website.

We will provide you with the information about the change in question and the purpose and any other relevant information before we use your information for that new purpose.

Wherever required, we will obtain your prior consent before using your information for a purpose that is different from the purposes for which we originally collected it.

Children's Privacy

Because we care about the safety and privacy of children online, we comply with the Children's Online Privacy Protection Act of 1998 (COPPA). COPPA and its accompanying regulations protect the privacy of children using the internet. We do not knowingly contact or collect information from persons under the age of 18. The website is not intended to solicit information of any kind from persons under the age of 18.

It is possible that we could receive information pertaining to persons under the age of 18 by the fraud or deception of a third party. If we are notified of this, as soon as we verify the information, we will, where required by law to do so, immediately obtain the appropriate parental consent to use that information or, if we are unable to obtain such parental consent, we will delete the information from our servers. If you would like to notify us of our receipt of information about persons under the age of 18, please do so by sending an email to office@eemeurope.org.

California Do Not Track Disclosures

"Do Not Track" is a privacy preference that users can set in their web browsers. When a user turns on a Do Not Track signal in their browser, the browser sends a message to websites requesting that they do not track the user. For information about Do Not Track, please visit www.allaboutdnt.org.

At this time, we do not respond to Do Not Track browser settings or signals. In addition, we use other technology that is standard to the internet, such as pixel tags, web beacons, and other similar technologies, to track visitors to the website. Those tools may be used by us and by third parties to collect information about you and your internet activity, even if you have turned on the Do Not Track signal. For information on how to opt out from tracking technologies used on our website, see [our Cookie Policy](#).

Copyright, credit, and logo

This Privacy Policy is based on a General Data Protection Regulation (Regulation (EU) 2016/769) (GDPR) compliant template provided by GDPR Privacy Policy. For further information, please visit <https://gdprprivacypolicy.org>.

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