

PRIVACY POLICY

January 2023

Welcome to the Website of Miftah ("**we**" or "**us**") at <http://www.miftah.org/>. Miftah (including all content under the "<http://www.miftah.org/>" domain name, and referred to herein as the "**Website**"). This Privacy Policy ("**Privacy Policy**") supplements and is included as a part of our Website Terms of Service. By accepting the Website Terms of Service, you also agree to this Privacy Policy.

1 Introduction

- 1.1 MIFTAH is a not-for-profit organization that works towards two distinct pathways. The first is to enhance policies and practices in line with civil rights and social justice in Palestine. This is done through providing evidence, fostering dialogue to formulate policy proposals, and empowering women and youth to uphold these policies. The second pathway focuses on enhancing the promotion of the Palestinian narrative at the international level through disseminating facts and figures about Palestine and engaging in dialogue with various stakeholders.
- 1.2 This privacy policy explains our online information collection and use practices, and the choices you may and can make about the way we use such information. Please read this privacy policy carefully to understand how we use your personal data (as defined below). Please note that, we may change this privacy policy from time to time, for example when we update the Website or expand our service and/or activities. Thus, we strongly recommend reviewing it whenever you visit the Website.

2 Scope

This Privacy Policy applies to web-users visiting Miftah website, within the www.Miftah.org domain name.

3 Applicable Law

- 3.1 This Privacy Policy is subject to local Palestinian laws and the provisions of applicable data protection and privacy laws of the General Data Protection Regulations (“GDPR”). For the purposes of the GDPR when you use our Website, we are a data “Controller” and you are a “Data Subject” with certain protected privacy rights concerning your “Personal Data.”
- 3.2 "Personal Data"/"Personal Information" in this Privacy Policy means any information relating to you as a natural person that can be directly or indirectly related to you. Personal Data generally may include your name, email address, ID number, location, household information, online ID, and factors specific to your physical, physiological, genetic, mental, economic, cultural or social identity. Your Personal Data may identify you as a person, and thus is often referred to as Personally Identifiable Information ("PII") or Personal Information ("PI"). Both PII and PI are included in the term "Personal Data" as used in this Privacy Policy.

4 Collection of Information

Miftah collects data through automated technologies or interactions. For example, Miftah follows a standard procedure of using log files. These files log visitors when they visit Websites. The information collected by log files includes Internet protocol (IP) address, browser type, Internet Service Provider (ISP), date and time stamp, referring/exit pages, and possibly the number of clicks. The purpose of the information is for analyzing trends, administering the site, tracking users' movement on the Website, and gathering demographic information.

5 Collected Information

- 5.1 **Website statistics:** We collect the date, time and length of your visit, browser identification and IP address for internal use and analysis of website traffic. This information is anonymised and used for statistical analysis only.
- 5.2 **Email sign-up to our newsletter:** When you provide us with your email address to receive newsletter updates at that email address, we use this internally and never share it with others. We will confirm your consent to receive the newsletters regularly, at least every 12 months.
- 5.3 **Other personal information:** We don't collect and/or use your information without your permission.

6 The Purpose of Collecting your Information

- 6.1 To allow you to contact us and/or receive information from us;
- 6.2 To organize or promote events and/or activities;
- 6.3 To allow you to register to participate in events we organize or co-organize;
- 6.4 To analyse web statistics and log files, with the aim of improving the functioning of our Website;
- 6.5 To send you, our newsletter when you provide your consent to us to do so.
- 6.6 We may use anonymous aggregated information that we collect to improve the design and content of our Website, and to enable us to personalize your Internet experience. We also may use this anonymous aggregated information to analyse how our Website is used, analyse industry trends, as well as to enable us to offer new programs or services.

7 Sharing your data/ Information

- 7.1 Miftah does not share your personal information with any third-party without your permission. Any personal data supplied by you will be retained by Miftah and will be accessible by Miftah's team on a "need to know" basis. Miftah has put in place appropriate measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorized way, altered or disclosed.
- 7.2 Miftah may only share your personal information to government agencies, regulators and other authorities when necessary for compliance with a legal obligation.

8 Storing your Data/Information

- 8.1 We hold your personal data/information in our Google analytics and Mailchimp accounts. By providing Miftah with your personal information, you consent to the transfer of your personal information to, and its storage on our Google Analytics and Mailchimp accounts

- 8.2 Miftah will only retain your personal data for as long as reasonably necessary to fulfil the purposes Miftah collected it for, including for the purposes of satisfying any legal or regulatory requirements.

9 Collection of Information by Others

Our Website may include links that take you to certain third-party websites. Please check the privacy policies of these other websites to learn how they collect, use, store and share information that you may submit to them or that they collect.

10 Legal Basis for Using your Personal Information

We will use your Personal Data under the following legal basis:

- 10.1 Where it is necessary for our legitimate interests and your interests and fundamental rights do not override those interests;
- 10.2 Where we need to perform our obligations under a contract we are about to enter into, or have entered into with you; and;
- 10.3 Where we need to comply with a legal obligation.

11 Our Contact Information

If you have any questions about this Privacy Policy, please contact us at: info@miftah.org.