

ICORN's Privacy Policy: Summary for Writers, Artists, and Journalists (Data Subjects) seeking assistance from ICORN

#### Introduction

This document contains a summary of <u>ICORN's General Policy on Personal Data Protection</u> (Privacy Policy). It is mainly aimed at the writers, artists, and journalists (data subjects) seeking assistance from ICORN whose personal data will be processed as part of their request.

#### **Purpose**

ICORN takes your privacy seriously. As the data controller, ICORN is responsible for ensuring that your personal data is collected, retained, and used in accordance with data protection legislation in <a href="Norway">Norway</a> and the <a href="European Union">European Union</a>.

Below, we provide you with information about how we use and protect your personal data, as well as what rights you have regarding your personal data. Personal data is all information that can be linked to you as an individual.

## Why do we collect and process information about you?

ICORN assists writers, artists, and journalists who are at risk because of their work to continue their professional activities in a safe environment, by providing residencies in Cities of Refuge.

In order to assess individual requests for assistance and find a well-suited residency, we need to collect and process personal data.

## Where do we get information about you from?

<u>Information provided by you</u>: To be able to assist you, we ask you to provide personal information at different stages. This can be, but is not limited to:



- identity information, such as name, date of birth, country of origin, citizenship, family situation, including digital copies of your identity documents;
- contact information, such as current location, email address, social media accounts, telephone number, emergency contacts;
- information about the risks you face because of your professional/artistic activities – professional and artistic credentials, details of persecution, description of your current situation

#### Information we collect about you from other sources:

- we may contact your referees to provide references;
- we conduct searches on the web in open sources, digital publications, and social media;
- we may contact other trusted organisations to verify information provided in your application

## What information do we have about you after you apply?

When you submit your full application for assistance, with supporting documents to ICORN, we create a digital case file in ICORN's secure data handling system. The information we register in ICORN's digital data handling system may include, but is not limited to:

- name, address, country of origin, citizenship, emergency contacts, family situation, professional and/or artistic credentials, details of persecution, ICORN's communication with you through the e-mail or other apps, such as WhatsApp, Signal, etc.;
- we also register other information that is relevant for assessing and processing your case, such as a summary of your case, digital copies of the supporting documents you sent to us, including digital copies of identity documents and/or documents indicating your legal status in a country/region from which you applied.



Your personal information is kept in a digital record with a unique identifier assigned to your case, as well as in ICORN's e-mails in Microsoft Outlook.

### How do we use your personal data?

We use your personal data to:

- verify the information you have provided;
- assess compliance with ICORN's mandate
- make sure that we can provide you with the support that you need;
- look for the well-suited ICORN residency/City of Refuge;
- assist you the best way possible to leave the country/region you applied from, and safely arrive to the City of Refuge that invited you for the ICORN residency;
- provide information necessary to the hosting City of Refuge, so that they can support you the best way possible when you arrive, and during the residency.

The legal basis for the above purposes of processing your data is that it is necessary in order to protect your vital interests, and that you have given your explicit consent to the processing of your personal data (GDPR Art. 6.1(a), Art. 6.1(d)).

#### Who do we share the information with?

We only share information with inviting ICORN Cities of Refuge- your potential hosts and relevant migration authorities, when necessary for the relocation process.

We may contact trusted humanitarian organisations to verify the information provided in your application if necessary, and only with your consent.

In case we cannot provide you with assistance and offer an ICORN residency, we may be able to refer you to other trusted organisations, with your consent.



### How long do we store your personal data?

We only store the data for as long as it is necessary for ICORN's purposes, and/or for as long as we have your consent. This typically means that we retain:

- email requests that have not submitted an application to ICORN, for three years (from the date of request received);
- cases that ICORN has closed, for 10 years (from the date of the email to the applicant notifying about the closure of their case);
- cases that have become inactive due to no contact with the applicant, for 10 years (from the date of last contact);
- personal data of former ICORN residents, for 15 years after the end of the ICORN residency;<sup>1</sup>
- personal data of the persons who withdraw their applications, for three years (from the date of the confirmation of withdrawal). The information will be stored in a non-operational, secure database and not processed due to <u>the statute of limitation</u>.
- the information provided by the references, as well as emergency contact information, for 10 years.

### Your privacy rights

You have a number of privacy rights, including:

- <u>Deletion/modification of personal data</u>: if you wish to correct or delete your data, you have the right to do so.
- <u>Information</u>: you have the right to access information about how we process your data and who we share it with.
- <u>Access</u>: you have the right to obtain a copy of the information we have about you.
- Restriction and objection: you have the right to request to object to the use of your data and to withdraw your consent. If this

<sup>&</sup>lt;sup>1</sup> ICORN is currently working on implementation of the 15-year timeframe for former ICORN residents, with a deadline of 1 June 2026.



reduces ICORN's ability to offer you guidance and support in the future, we will make you aware of this.

### Changes to the privacy policy

We may update our privacy policy from time to time. You will always find the latest version of our privacy policy on our <u>website</u>

#### **ICORN Data Protection Officer**

If you have any questions and/or concerns about the way in which ICORN is processing your personal data, or you would like to withdraw your consent, please contact ICORN's Data Protection Officer at dataprotection@icorn.org.

We will respond to your inquiry as soon as possible, and within one month at the latest.

If you believe that we are processing your personal data unlawfully, you have the right to complain to the Norwegian Data Protection Authority (<u>Datatilsynet</u>). We hope that you will contact us first, so that we can consider and address your objections.

