

Data Privacy Notice

Last updated 01.04.2024

The environmental organization WWF Austria (hereinafter "WWF") is pleased that you are visiting our website. Data protection and data security are very important to us. We would therefore like to inform you at this point which of your personal data we collect during your visit to our website and in other processes (referring to this data protection notice) and for which purposes it is used.

Legal developments or updates to our internal processes may require changes to this privacy notice. We therefore recommend reviewing it regularly. You can access, save, and print the most current version of the privacy notice at any time at www.wwf.at/datenschutz.

1. Principles of data processing

Personal data refers to any information relating to an identified or identifiable natural person. This includes, for example, information such as your name, age, address, telephone number, date of birth, e-mail address, IP address or user behavior. Information that cannot be linked to you personally—or only with disproportionate effort—such as anonymized data, is not considered personal data. The processing of personal data (e.g. collection, retrieval, use, retention or transmission) always requires a legal basis or your consent. Processed personal data will be deleted as soon as the purpose of the processing has been achieved and there are no longer any legally required retention obligations.

If we process your personal data for the provision of certain offers, we will inform you below about the specific procedures, the scope and purpose of the data processing, the legal basis for the processing and the respective Retention Period

2. Data subject rights: Your rights in connection with personal data

The General Data Protection Regulation (hereinafter "GDPR") gives you the following rights as a data subject of a processing of personal data:

• In accordance with Art. 15 GDPR, you can request information about your personal data processed by us. In particular, you can request information about the processing purposes, the categories of personal data, the categories of recipients to whom your data have been or will be disclosed, the planned Retention Period, the existence of a right to rectification, erasure, restriction of processing or objection, the existence of a right of complaint, the origin of your data if it has not been collected by us, about a transfer to third countries or to international organizations, as well as about the existence of

- automated decision-making, including profiling, and, if applicable, meaningful information about its details.
- *In accordance with Art. 16 GDPR*, you may request the correction of inaccurate or the completion of your personal data stored by us without delay.
- In accordance with Art. 17 GDPR, you may request the erasure of your personal data stored by us, unless the processing is necessary for the exercise of the right to freedom of expression and information, for compliance with a legal obligation, for reasons of public interest or for the establishment, exercise or defense of legal claims.
- In accordance with Art. 18 GDPR, you may request the restriction of the processing of your personal data if you dispute the accuracy of the data, the processing is unlawful, we no longer need the data and you object to their erasure because you need it for the assertion, exercise or defense of legal claims. You also have the right under Article 18 of the GDPR if you have objected to the processing in accordance with Article 21 of the GDPR (see also 3. Right to object).
- In accordance with Art. 20 GDPR, you may request to receive your personal data that you have provided to us in a structured, commonly used and machine-readable format or you may request that it be transferred to another controller.
- In accordance with Art. 7 (3) GDPR, you may revoke your consent once given to us at any time. This has the consequence that we may no longer continue the data processing based on this consent for the future.
- In accordance with Art. 77 GDPR, you have the right to complain to a supervisory authority. As a rule, you can contact the supervisory authority of your usual place of residence, your place of work or our company.

3. Right to object

When your personal data is processed on the basis of legitimate interests in accordance with Art. 6 (1) sentence 1 lit. f of the GDPR, you have the right to object to the processing of your personal data pursuant to Art. 21 of the GDPR, insofar as there are grounds for doing so that arise from your particular situation or the objection is directed against direct advertising. In the case of direct advertising, you have a general right of objection, which is implemented by us without specifying a particular situation.

Furthermore, we would like to point out that you can revoke consent already given to the WWF at any time. The revocation can be sent either to datenschutz@wwf.at or by post to: WWF Austria, Ottakringer Straße 114-116, 1160 Vienna.

4. Data controller and scope of application

The data controller within the meaning of the EU General Data Protection Regulation (hereinafter "GDPR"), as well as other applicable national data protection laws of the Member States and other data protection regulations, is:

Umweltverband WWF Österreich Ottakringer Strasse 114-116, 1160 Vienna, Austria

Telephone: +43 1 48817 -0 Fax: +43 1 488 17 - 44 E-mail: wwf@wwf.at ZVR-No.: 751753867 Tax-ID-No.: ATU59082977

5. Contact for data protection inquiries, notifications, requests

If you wish to exercise your rights, or if you believe that the processing of your personal data violates data protection law or that your data protection rights have been infringed in any other way, please do not hesitate to contact us:

Umweltverband WWF Österreich Ottakringer Strasse 114-116, 1160 Vienna, Austria

Telephone: +43 1 48817 -0 Fax: +43 1 488 17 - 44 E-mail: <u>datenschutz@wwf.at</u>

Mag.^a Karin Dietl has been appointed as the external Data Protection Officer.

Please contact WWF's **data protection coordinators** at <u>datenschutz@wwf.at</u> for **data protection questions** and <u>wwf@wwf.at</u> for **all other questions**.

6. Overview of the legal basis for the use of your data

The processing of your data is based on one of the following legal grounds:

- Your validly given consent (Art. 6 para. 1 a GDPR), which you can revoke at any time;
- to the establishment or performance of a contract or other obligations directly related thereto (Art. 6 para. 1 b GDPR);
- to comply with legal obligations (Art. 6 para. 1 c GDPR);
- to pursue the legitimate interests of WWF, unless your interests or fundamental rights outweigh them (Art. 6 para. 1 f GDPR).

The legitimate interests of WWF are

- o in the interest of nature conservation, the worldwide preservation of nature and its various manifestations
- to promote the awareness of the general public for the concerns of nature conservation and environmental protection and the ecological, social and economically sustainable development, and thus also to promote the identical efforts of the foundation "WORLD WIDE FUND FOR NATURE" (formerly: "WORLD WILDLIFE FUND") in Austria and internationally.

7. Recipients of personal data

We will only pass on your personal data to third parties if:

- you have given your express consent to this in accordance with Art. 6 para. 1 p. 1 lit. a
- this is legally permissible and necessary for the fulfilment of a contractual relationship with you according to Art. 6 para. 1 p. 1 lit. b GDPR

- there is a legal obligation for the transfer according to Art. 6 para. 1 p. 1 lit. c GDPR
- the disclosure is necessary in accordance with Art. 6 para. 1 p. 1 lit. f GDPR for the protection of legitimate organizational interests, as well as for the assertion, exercise or defense of legal claims and there is no reason to assume that you have an overriding interest worthy of protection in the non-disclosure of your data.

In the context of operating our websites, carrying out surveys and communicating donations by post and telephone and in the context of projects, service providers support us on this legal basis. In the course of their activities, these service providers have access to your personal data insofar as they require the data to perform their respective services. They have undertaken to comply with the applicable data protection regulations. Order processing contracts are concluded in accordance with Art 28 and Art 26 of the GDPR. We work exclusively with service providers who offer sufficient guarantees that appropriate technical and organizational measures are implemented in such a way that the processing is carried out in accordance with the requirements of the data protection regulations and ensures the protection of your rights.

If data processing activities are carried out by service providers, at least in part also outside the EU or the EEA, you will be informed of this. Furthermore, an appropriate level of data protection must be guaranteed by such service providers. This results from:

- an adequacy decision by the European Commission pursuant to Art 45 GDPR.
- an exception for the specific case pursuant to Art 49 (1) GDPR.
- binding internal data protection rules pursuant to Art 47 in conjunction with Art 46 (2) (b) GDPR.
- standard data protection clauses pursuant to Art 46 (2) (c) and (d) GDPR.
- approved codes of conduct pursuant to Art 46 (2) (e) in conjunction with Art 40 GDPR.
- an approved certification mechanism pursuant to Art 46 (2) (f) in conjunction with Art 42 GDPR.
- contractual clauses approved by the data protection authority pursuant to Art 46 (3) lit a GDPR.
- a case-by-case exemption pursuant to Art 49 (1), second subparagraph of the GDPR.

8. Further Information on individual processing activities

Information regarding the use of cookies in accordance with § 96(3) of the Austrian Telecommunications Act (TKG) and the GDPR can be found in **section 8.12**, **"Cookie Policy."**

8.1. Automatic logging when using the website

8.1.1. Type and scope of data processing

When you call up and use our website, we collect the personal data that your browser automatically transmits to our server. This information is temporarily stored in a so-called log file. When you use our website, we collect the following data, which is technically necessary for us to display our website to you and to ensure its stability and security:

- IP address of the requesting computer
- date and time of access
- website name and URL
- website from which the access is made (referrer URL)

• browser used and, if applicable, the operating system of your computer, as well as the name of your access provider.

8.1.2. Legal basis

Art. 6 para. 1 lit. f GDPR serves as the legal basis for the aforementioned data processing. The processing of the aforementioned data is necessary for the provision of a website and thus serves to protect a legitimate interest of our organization.

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8.1.3. Retention Period

The aforementioned data for displaying the website will be deleted by us after one month. The collection of the data for the provision of the website and the retention of the data in log files is absolutely necessary for the operation of the website. Consequently, there is no possibility for the user to object. Further retention may take place in individual cases if required by law.

8.2. Newsletter

8.2.1. Type and scope of data processing

On our website, you have the option of subscribing to the free WWF newsletter as well as other topic-specific newsletters. In order to be able to send you these newsletters regularly, we need the following information from you:

- title (gender)
- e-mail address
- first and last name
- date of birth, e-mail address of legal guardian (for Team Panda Newsletter)
- company/institution (for Environment and Economy Newsletter)
- school subject and address (for newsletter for teachers)

Your data will not be shared with third parties in connection with the newsletter. We use the double opt-in procedure for sending the newsletter, i.e. we will only send you the newsletter if you first confirm your registration by means of a confirmation e-mail sent to you. In this way, we would like to ensure that only you yourself, as the owner of the e-mail address provided, can register for the newsletter. Your confirmation must be made within 2 weeks after receipt of the confirmation e-mail, otherwise your newsletter registration will be automatically deleted from our database.

8.2.2. Legal basis

The processing of your e-mail address, first and last name and title, as well as further data for the topic-specific newsletters, for the newsletter dispatch, is based on the consent voluntarily given by you in accordance with Art. 6 Para. 1 lit. a GDPR.

For other processing operations such as campaign support or donations, you can consent to receiving the WWF newsletter by voluntarily and actively selecting a checkbox as part of the higher-level operation. In this case, a confirmed opt-in procedure is used instead of a double opt-in procedure for the newsletter registration, as you will already receive an e-mail for this after completion of the higher-level process and we would like to save you having to respond promptly to multiple e-mails from us.

8.2.3. Retention Period

Your e-mail address, your first and last name and your title will be stored for as long as you have subscribed to the newsletter. After unsubscribing from the newsletter, your data will be deleted after a transitional period of 7 days. Further retention without permission to send newsletters may take place in individual cases if this is required by law or if the data is still needed for other active processing procedures.

8.3. Contact forms

8.3.1. Type and scope of data processing

On our website, we offer you the opportunity to contact us via a secure form provided. When submitting your enquiry via these contact forms, we will refer you to this privacy policy in order to obtain your consent. If you make use of the contact forms, the following personal data of yours will be processed, depending on the selected reason for the enquiry (feedback, order info pack, change of address data and bank details):

- title (gender)
- first and last name
- e-mail address
- telephone number
- address data
- bank details
- sponsorship number
- date of birth
- personal message

This information is used to process your request. When using the contact form, your personal data will not be passed on to third parties.

8.3.2. Legal basis

The aforementioned data processing for the purpose of contacting you is based on your voluntary consent in accordance with Art. 6 Para. 1 lit. a GDPR.

8.3.3. Retention Period

The personal data processed via the contact form will be deleted at the latest one month after the enquiry you have made has been dealt with and the matter in question has been conclusively clarified. Further retention may take place in individual cases if this is required by law or serves to protect the legitimate interest of our organization.

8.4. Campaign support

8.4.1. Type and scope of data processing

On our website and on the print forms, posters and advertisements we provide, we offer you the opportunity to participate in our campaigns by means of petitions and thus directly support our work. If you make use of the online forms, the following personal data will be processed from you in order to be able to incorporate your support into our campaign work:

- First and last name
- email address
- Telephone number
- Postal address
- Date of birth

The purpose of providing your name, email address and/or telephone number is to be able to attribute your support to our campaign, to provide you with information about your support when necessary and to protect us from abuse. The purpose of providing your postal address is to send you material as part of your support. The purpose of providing your date of birth is to check whether we can legally process your campaign support.

8.4.2. Legal basis

The aforementioned data processing for the purpose of contacting you is based on voluntarily given consent in accordance with Art. 6(1)(a) of the GDPR:

Information on how and where consent can be revoked can be found directly below the respective form or you can also contact datenschutz@wwf.at. The regular checking of postal addresses for accuracy is carried out in accordance with Art. 6 Para. 1 lit f GDPR.

8.4.3. Retention Period

To protect our legitimate interests, we reserve the right to store your data provided during the support for up to 12 months after the end of the campaign. However, the total Retention Period is a maximum of 84 months, even if the supported campaign has not ended by then. Within this period, we may contact you in the event of success or further support required due to short-term changes in the political framework for the success of the campaign. At the end of this period, your processed personal data will be deleted from our database.

8.5. Donations

8.5.1. Type and scope of data processing

On our website, at information stands, via SMS or in personal conversations, we offer you the opportunity to financially support the national and international work of WWF Austria. In the context of the donation process, the following personal data will be processed from you:

- title (gender)
- first and last name
- e-mail address
- date of birth
- telephone number
- postal address
- donation volume and payment method
- account details (for direct debit)

The name, date of birth, postcode and annual amount are automatically transmitted to the tax office so that your donation is taken into account for tax deductibility. However, this data will not be transferred to the tax office if you expressly prohibit this by sending an e-mail with "STOP donation deductibility" and your details to service@wwf.at.

We make every effort and are obliged by data protection law to keep your address data as up to date as possible.

Our **donation forms** are accessed securely via a Secure Sockets Layer (SSL) connection and their data is transmitted securely. You can recognize secure transmission by a closed lock in the status bar of your internet browser. Your data is encrypted on the way from your computer to us and can only be read again on our server. A security certificate from Thawte confirms the authenticity.

If you donate by credit card, your credit card data is transmitted exclusively via 256-bit SSL encryption to our certified and audited payment provider mPAY24, where the correctness of the card data is checked with the respective credit card company and creditworthiness and validity are verified. We do not store your credit card data.

Title, first name, last name, address, postcode and city are mandatory fields, as this is the only way we can guarantee a clear allocation of your donation in our database.

Furthermore, the provision of name data and bank details is necessary for the completion of the donation and due to tax regulations as well as money laundering regulations.

8.5.2. Legal basis

Art. 6 para. 1 lit. b GDPR serves as the legal basis for the aforementioned data processing. The processing of the above-mentioned data is necessary for the fulfilment of the donation contract between you and WWF Austria.

The regular checking of postal addresses for accuracy is carried out in accordance with Art. 6 Para. 1 lit f GDPR.

8.5.3. Retention Period

The personal data processed via the donation forms, or a personal conversation will be deleted 36 months after your last donation. All books and records, as well as supporting documents belonging to the books and records, are stored for 7 years in accordance with § 132 BAO.

8.5.4. Data not collected from you

If you donate to us by direct bank transfer, your bank will usually also send us your postal contact details. WWF stores this data and uses it to contact you if necessary. The data processing is based on WWF Austria's legitimate interest pursuant to Art 6 (1) f of the GDPR to contact its donors, to thank them and to inform them about news at WWF Austria.

8.6. Raffles and join-in promotions

8.6.1. Type and scope of data processing

On our website, we offer you the opportunity to participate in competitions via online forms. In addition, there is also the option of filling out a participant card and sending it in by post or email for other competitions and participation campaigns. We process the inventory data provided in order to carry out and process the competition or participation campaign (e.g. selection/drawing of the winner, information to the winner). This usually includes the following personal data:

- title (gender)
- first and last name (in the case of raffles or promotions for children, if they are under 16 years of age, also those of their legal guardians)
- e-mail address
- date of birth
- postal address
- country
- sometimes also painted pictures and photos

For the distribution of the prizes, the personal data of the winners are sometimes also passed on to partners with whom there is a cooperation within the framework of the competition or the campaign. *An agreement on joint responsibility pursuant to Article 26 GDPR* is concluded with these partners. The names of the winners, painted pictures and photos are occasionally published on our website and in our print media and those of our partners with the consent of the persons concerned (or, in the case of children under 16, their legal guardians).

8.6.2. Legal basis

The legal basis for the processing of personal data collected in the context of competitions in order to enable the processing of the competition is the fulfilment of a contract (GDPR Article 6. para. 1 (b)). The legal basis for the publication of painted pictures and photos is the consent given in accordance with Art. 6 para. 1 a of the GDPR (for children up to 16 years of age, that of the legal guardian, for children over 16 years of age, that of the children themselves).

When registering, please also note the conditions of participation listed.

8.6.3. Retention Period

We will store your personal data for a maximum of 30 days after successful completion of the competition or participation campaign or until you revoke your consent (GDPR § 17). In the event of revocation, your data will usually be deleted after a maximum of 20 working days. In case of publication, the recordings can be published for as long as the respective publication media, articles or contributions are publicly accessible.

8.7. Photo Contests

8.7.1. Type and Scope of Data Processing

On our website, we offer you the opportunity to participate in photo contests via online forms. We process the provided personal data for the purpose of conducting and managing the photo contest (e.g., selection/drawing of winners, informing the winners). These generally include the following personal data:

- Salutation (gender)
- First and last name
- Email address
- Date of birth
- Postal address
- Country
- Occasionally also the telephone number

If the contests are held jointly with partners, there is an agreement with them regarding joint data processing according to Article 26 GDPR.

WWF Austria processes your email address and telephone number only for contacting you in the context of the photo contest. If you have also subscribed to the newsletter, your email address will be processed for a longer period in that context. Photos and usernames are processed exclusively in connection with the contest. The username is processed in relation to the contest; the photos themselves, upon transfer of usage rights, may also be used for our other public relations work. Should processors assist us during processing, contracts in accordance with Article 28 or Article 26 GDPR are concluded with them.

8.7.2. Legal Basis

The processing of photo recordings is based on your consent pursuant to Article 6(1)(a) GDPR.

8.7.3. Retention Period

Photo and video recordings are stored as long as necessary for the aforementioned purposes or until you withdraw your consent. Upon withdrawal, your data will usually be deleted within a

maximum of 20 working days. In the case of publication, the recordings may remain published for as long as the respective publication media, articles, or posts are publicly accessible.

8.8. Applications

8.8.1. Type and scope of data processing

On our website, we offer you the possibility to apply and register with WWF Austria via the applicant management software https://prescreen.io to work in our organization and for our campaigns. When submitting your application or registration via the online form, we refer you to this data protection statement https://wwf-at.jobbase.io/policy to obtain your consent. If you make use of the online form https://wwf-at.jobbase.io/signup, the following personal data of you will be processed to enable the implementation of pre-contractual measures

- title (gender)
- first and last name
- e-mail address
- telephone number
- postal address
- date of birth
- citizenship (in case of employment)
- freely selected CV, freely selected letter of motivation
- optional application photo
- possible starting date, salary expectations, application channel (also: "Other" can be selected)
- applicant communication regarding the job advertisement

The purpose of providing your name, e-mail address and/or telephone number is to contact you during the application process. The purpose of providing your date of birth is to check whether we are legally allowed to process your application. The purpose of providing personal skills, experience and any other information within your CV is to ensure that we can fill available positions in the best possible way.

8.8.2. Legal basis

Art. 6 para. 1 lit. b GDPR and Art. 6 para. 1 lit. f GDPR serves as the legal basis for the aforementioned data processing. The processing of the aforementioned data is necessary for the implementation of pre-contractual measures and thus serves the protection of the legitimate interest of our organization. Furthermore, Art. 6 Para. 1 lit a GDPR serves as the legal basis if you consent to keep your application on record if required.

Declaration of consent

I give my express consent to the collection, retention and processing of my personal data submitted in the course of this application procedure, particularly my CV, any evidence of my professional qualifications as well as written and electronic communication for the purpose of keeping records. This consent is voluntary and can be revoked at any time.

The data collected in the context of my application will neither be published nor passed on to third parties without authorization, i.e. in particular without my consent. My data will be deleted as soon as the purpose of the processing has been achieved and provided that there is no other legal retention

period to the contrary. My personal data will be kept on record for a maximum period of three years (six months in the case of refusal).

8.8.3. Retention Period

Personal data processed via the application and registration forms will be deleted no later than 6 months after the end of the tender process. Personal data kept on record will be deleted after 3 years at the latest.

8.9. E-Mail contact

8.9.1. Type and scope of data processing

If you contact us by e-mail, the data you provide will be used for the purpose of processing your enquiry. We will not pass this on to third parties without your consent.

8.9.2. Legal basis

The legal basis for answering enquiries (e-mail) is, depending on the circumstances, your implied consent according to Art. 6 Para. 1 lit. a GDPR or the implementation of pre-contractual measures according to (Art. 6 Para. 1 b GDPR).

8.9.3. Retention Period

Your data will be stored by us for six months from the date of our reply to your question in case of follow-up questions. Once your enquiry has been dealt with and the matter in question has been conclusively clarified, your personal data will be deleted. Further retention may take place in individual cases if this is required by law or serves to protect the legitimate interest of our organization.

8.10. Photographs and video recordings

8.10.1. Type and scope of data processing

In the context of events (e.g. workshops, information events, excursions and actions in the public space, press conferences), we take photos and make video recordings. These serve our public relations work, the documentation of our services, public reporting on the event and generally the presentation of our activities to increase our level of awareness. The data is stored, processed and partly published on our website and in our social media channels (Facebook, Twitter, Instagram), print media (association newspapers, brochures, folders) and sometimes also used for presentation and illustration purposes, as well as made available to the press.

Recipients of the data are also contractors and processors involved in the processing (production and publication). Order processing contracts are concluded with them in accordance with Art. 28 and Art. 26 of the GDPR. In the case of publication in social media channels, however, it may be that the respective social media service receives exploitation rights to the published data.

If recordings are made of you, we will inform you of this in advance of the event (invitation, application) as well as directly at the event by means of notices, displays or information leaflets and inform you in accordance with Art 13 of the GDPR.

8.10.2. Legal basis

The data processing of the photo and video recordings is carried out based on the legitimate interest pursuant to Art 6 (1) f of the GDPR (the public relations work and presentation of the activities of WWF to the public is part of its legitimate interest) and in accordance with national special data protection law §§ 12-13 DSG. According to the latter, image recordings are permissible if:

- necessary in the vital interest of a person,
- the data subject has consented to the processing of his or her personal data,
- it is permitted by special legal provisions, or
- in individual cases there are overriding legitimate interests of the controller, or a third party and proportionality is given.

In the case of children, data processing is always based on the consent of the parent or guardian, or in the case of young people from the age of 16.

In the case of children, data processing is always based on the consent of the parent or guardian, or in the case of young people from the age of 16.

However, we assume that our interest in the production and use of the photographs and video recordings does not unduly interfere with the rights and freedoms of the persons concerned, especially since they have gone into the public space, the production and use of the photographs and video recordings have been pointed out in advance and at the event, and care is taken both in the production of the recordings and in the publication of the same that no legitimate interests of persons depicted are violated. If the rights and freedoms of a person depicted are violated for reasons particularly worthy of consideration, we will take appropriate measures to refrain from further processing. A deletion in print media that has already been issued cannot take place. Deletion on the website or on social media channels will take place within the scope of technical possibilities.

8.10.3. Retention Period

The photo and video recordings will be stored for as long as is necessary for the aforementioned purposes or until you revoke them. In the event of revocation, your data will usually be deleted after a maximum of 20 working days. In addition, the recordings may be kept for longer to secure legal claims under copyright law by providing evidence of original recordings and for reasons of contemporary historical documentation. In the case of publication, the recordings may be published for as long as the respective publication medium, article or contribution is publicly accessible.

8.11. Exchange with partners and stakeholders

8.11.1. Type and scope of data processing

In the context of our content-related, political and media work, we collect personal data from staff members of political and scientific institutions, companies and associations that are relevant to our work on a specific topic. This data may also come from public sources before the first contact. The following data will be processed:

• first and last name

- e-mail address
- reference to concrete topic
- institution
- position

The purpose is to exchange information on current actions and processes, but also to maintain long-term relationships.

8.11.2. Legal basis

Data processing and contacting is based on legitimate interest in accordance with Art. 6 para. 1 lit. f GDPR and on your implied consent according to Art. 6 para. 1 lit. a GDPR. As a data subject, you may object to the processing of your personal data at any time.

8.11.3. Retention Period

This personal data will be processed and stored until the conclusion of concrete actions on the topic (e.g. appeals to politicians, campaigns, events) and beyond that in the context of further processing of the topic.

If you object to the processing, the personal data will no longer be processed for these purposes and will be deleted after 20 days at the latest.

8.12. Projects

8.12.1. Type and scope of data processing

Personal data is collected in the context of our projects to:

- obtain funding and provide evidence of its proper use (personal data required for the processing of funding) and
- to enable the organization and management of project events, workshops, environmental education days and to provide information about the project in partnership discourse with local communities and stakeholders.

Recipients or categories of recipients of personal data in the case of funding and contract data are: competent administrative authorities, in particular financial authorities; funding bodies, banks. We do not pass on personal data collected via e-mail contact to third parties without your consent. There is no intention of transferring personal data to a third country or an international organization.

8.12.2. Legal basis

The legal basis for obtaining funding, providing evidence of its proper use and for public communication (discourse with local communities and interest groups, etc.) is our legitimate interest (Art. 6 para. 1 p. 1 lit. f GDPR) in the interest of nature conservation is to promote the worldwide conservation of nature and its various manifestations, the awareness of the general public for the concerns of nature conservation and environmental protection and the ecological, social and economically sustainable development and thus also the efforts of the "WORLD WIDE FUND FOR NATURE" foundation (formerly: "WORLD WILDLIFE FUND") in Austria and internationally, which are identical in content. The projects are part of this legitimate interest.

The legal basis for the processing of personal data collected in the context of the projects in order to ensure the organization and handling of project events, workshops, environmental education days is the performance of a contract pursuant to Art. 6 (1) b GDPR, of which the data subject is a contracting party, or is necessary for the implementation of pre-contractual measures, which are carried out at the request of the data subject; the provision of personal data is required by law and contract or is necessary for the conclusion of a contract, if any. Possible consequences of not providing the data would be that participation in project events, workshops or environmental education days would not be possible.

8.12.3. Retention Period

For personal data that we need for the processing of funding, the Retention Period according to the funding conditions is 2 to usually a maximum of 10 years, depending on the funding program.

Contractual data is stored for the legal retention period of 7 years according to BAO.

8.13. Cookie Policy

8.13.1. Type and scope of data processing

When using our website, cookies are also stored on your end device. These are small text files that store certain settings and data for exchange with our system via your browser. Each cookie has its own ID and can be stored on your end device with the help of your browser. They do not cause any damage. We use these cookies, among other things, to make our offer user-friendly. A distinction can be made between:

Absolutely necessary cookies: These cookies are necessary for our website to function properly. No personal data can be determined from these cookies.

Functional third-party cookies: These cookies are necessary to be able to offer third-party functions on our website. This includes, for example, YouTube, Facebook and Twitter.

Analytics cookies: These can be used to collect aggregated data about user behavior. This information is used to improve our website.

Marketing cookies: These are used to show our users advertisements on other websites, such as Facebook or Google.

8.13.2. Legal basis

We use cookies in accordance with the applicable legal situation (Art 5 (3) ePrivacy Directive; § 96 (3) TKG 2003). If the sole purpose is to carry out the transmission of a message via a communication network, or if this is absolutely necessary to be able to provide a service that you have expressly requested, cookies are used or set without your prior consent.

The legal basis for these technically necessary cookies is our legitimate interest within the meaning of Art. 6 para. 1 lit. f GDPR. The processing of the aforementioned data is necessary for the provision of our website. The legal basis for the use of analysis and advertising cookies is your consent, Art. 6 para. 1 lit. a GDPR by activating them via our cookie banner. You can revoke this consent at any time via the cookie settings at the bottom of the website footer.

NOTE: In the case of cookies from third-party providers based in the USA, these are also only set with your consent, as the USA has not been certified by the European Court of Justice as having an adequate level of data protection. There is a risk that your data may be accessed by US authorities for control and monitoring purposes and that no effective legal remedies are available against this.

8.13.3. Retention Period

Many of these are "session cookies" which are deleted without your intervention as soon as you end your current browser session. Some cookies remain stored on your terminal device until you delete them. They enable us, for example, to recognize your browser on your next visit. If you do not wish this, you can set your browser so that it informs you about the setting of cookies and you only allow this in individual cases. You can find setting options for the most common browsers under the following links:

- Internet Explorer™: http://windows.microsoft.com/de-at/windows-vista/Block-or-allow-cookies
- Chrome™: http://support.google.com/chrome/bin/answer.py?hl=de&hlrm=en&answer=95647
- Firefox™: https://support.mozilla.org/de/kb/cookies-erlauben-und-ablehnen
- Opera™: http://help.opera.com/Linux/9.01/de/cookies.html
- Safari™: https://de.norton.com/blog/how-to/clear-cache-and-cookies

8.14. Tracking/analysis and marketing tools

8.14.1. Type and scope of data processing

Google Analytics:

Our website uses functions of the web analysis service Google Analytics (Google Inc. 1600 Amphitheatre Parkway Mountain View, CA 94043, USA).

Google Analytics uses so-called "cookies". These are text files that are stored on your computer and enable an analysis of your use of the website. The information generated by the cookie about your use of this website is usually transmitted to a Google server in the USA and stored there.

The retention of Google Analytics cookies and the use of this analysis tool are based on Art. 6 (1) lit. f of the GDPR. The website operator has a legitimate interest in analyzing user behavior to optimize both its website and its advertising. If a corresponding consent has been requested (e.g. consent to the retention of cookies), the processing is carried out exclusively based on Art. 6 para. 1 lit. a GDPR; the consent can be revoked at any time.

Google Analytics stores cookies in your web browser for a period of **two years** since your last visit. These cookies contain a randomly generated user ID that can be used to recognize you during future website visits.

The recorded data is stored together with the randomly generated user ID, which enables the evaluation of pseudonymous user profiles. This user-related data is automatically **deleted after 14 months**. Other data remains stored in aggregated form indefinitely.

This website uses the IP anonymization option offered by Google Analytics. Your IP address will therefore be shortened/anonymized by Google as soon as Google receives your IP address. Google will use this information on our behalf for the purpose of evaluating your use of the website, compiling reports on website activity and providing other services relating to website

activity and internet usage. The IP address transmitted by your browser as part of Google Analytics will not be merged with other data by Google.

You may refuse the use of cookies by selecting the appropriate settings on your browser, however, please note that if you do this you may not be able to use the full functionality of this website. You can also prevent the collection of data generated by the cookie and related to your use of the website (including your IP address) by Google and the processing of this data by Google by downloading and installing the browser plugin available at the following link: https://tools.google.com/dlpage/gaoptout?hl=de.

You can prevent the collection of your data by Google Analytics by clicking on the following link. An opt-out cookie will be set, which will prevent the collection of your data during future visits to this website: Deactivate Google Analytics.

For more information on how Google Analytics handles user data, please see Google's privacy policy: https://support.google.com/analytics/answer/6004245?hl=de.

Google Analytics Remarketing:

This website uses the functions of Google Analytics Remarketing in conjunction with the cross-device functions of Google Ads and Google DoubleClick. The provider is Google Ireland Limited ("Google"), Gordon House, Barrow Street, Dublin 4, Ireland.

This function makes it possible to link the advertising target groups created with Google Analytics Remarketing with the cross-device functions of Google Ads and Google DoubleClick. In this way, interest-based, personalized advertising messages that have been adapted to you depending on your previous usage and surfing behavior on one end device (e.g. mobile phone) can also be displayed on another of your end devices (e.g. tablet or PC).

If you have given your consent, Google will link your web and app browsing history to your Google Account for this purpose. In this way, the same personalized advertising messages can be displayed on every device on which you log in with your Google account.

To support this feature, Google Analytics collects Google-authenticated IDs of users, which are temporarily linked to our Google Analytics data to define and create audiences for cross-device ad targeting.

You can permanently object to cross-device remarketing/targeting by deactivating personalized advertising; follow this link: https://www.google.com/settings/ads/onweb/.

The compilation of the collected data in your Google account is based solely on your consent, which you can give or revoke at Google (Art. 6 para. 1 lit. a GDPR). In the case of data collection processes that are not merged in your Google Account (e.g. because you do not have a Google Account or have objected to the merging), the collection of the data is based on Art. 6 (1) f GDPR. The legitimate interest results from the fact that the website operator has an interest in the anonymized analysis of website visitors for advertising purposes.

Further information and the data protection provisions can be found in Google's privacy policy: https://policies.google.com/technologies/ads?hl=de.

Google Tag Manager:

Our website uses Google Tag Manager (Google Inc. 1600 Amphitheatre Parkway Mountain View, CA 94043, USA). Google Tag Manager is a solution that allows marketers to manage website tags

via an interface. The tool itself (which implements the tags) is a cookie-less domain and does not store any personal data. The tool takes care of triggering other tags, which in turn may collect data. Google Tag Manager does not access this data. If a deactivation has been made at the domain or cookie level, this remains in place for all tracking tags implemented with Google Tag Manager.

Google Ads und Google Conversion-Tracking:

Our website uses Google Ads (Google Inc. 1600 Amphitheatre Parkway Mountain View, CA 94043, USA).

Within the framework of Google Ads, we use so-called conversion tracking. When you click on an ad placed by Google, a cookie is set for conversion tracking. Cookies are small text files that the internet browser stores on the user's computer. These cookies lose their validity after 30 days and are not used to personally identify the user. If the user visits certain pages of this website and the cookie has not yet expired, Google and we can recognize that the user has clicked on the ad and been redirected to this page.

You can set your browser so that you are informed about the setting of cookies and only allow cookies in individual cases, exclude the acceptance of cookies for certain cases or in general and activate the automatic deletion of cookies when closing the browser. If cookies are deactivated, the functionality of this website may be limited. Each Google Ads customer receives a different cookie. The cookies cannot be tracked across Ads clients' websites. The information obtained using the conversion cookie is used to generate conversion statistics for Ads customers who have opted in to conversion tracking. Clients learn the total number of users who clicked on their ad and were redirected to a page tagged with a conversion tracking tag. However, they do not receive any information that personally identifies users.

More information on Google Ads and Google conversion tracking can be found in Google's privacy policy: www.google.de/policies/privacy/.

The retention of "conversion cookies" is based on Art. 6 para. 1 lit. f GDPR. The website operator has a legitimate interest in analyzing user behavior in order to optimize both its website and its advertising.

You can set your browser so that you are informed about the setting of cookies and only allow cookies in individual cases, exclude the acceptance of cookies for certain cases or in general and activate the automatic deletion of cookies when closing the browser. If cookies are deactivated, the functionality of this website may be limited.

Facebook Pixel, Facebook Custom Audiences and Facebook-Conversion:

Within our online offer, the so-called "Facebook Pixel" of the social network Facebook, which is operated by Facebook Inc, 1 Hacker Way, Menlo Park, CA 94025, USA, or if you are a resident of the EU, Facebook Ireland Ltd, 4 Grand Canal Square, Grand Canal Harbour, Dublin 2, Ireland ("Facebook"), is used.

With the help of the Facebook pixel, it is possible for Facebook to determine you as a visitor to our online offer as a target group for the display of advertisements (so-called "Facebook ads"). Accordingly, we use the Facebook pixel to display the Facebook ads placed by us only to those Facebook users who have also shown an interest in our online offer or who have certain characteristics (e.g. interests in certain topics or products determined based on the websites visited) that we transmit to Facebook (so-called "Custom Audiences"). With the help of the Facebook pixel, we also want to ensure that our Facebook ads correspond to the potential interest of the users and do not have a harassing effect. With the help of the Facebook pixel, we

can also track the effectiveness of the Facebook ads for statistical and market research purposes by seeing whether users were redirected to our website after clicking on a Facebook ad (so-called "conversion").

The processing of the data by Facebook takes place within the framework of Facebook's data use policy. Accordingly, general information on the display of Facebook ads, in Facebook's <u>data use policy</u>. For specific information and details on the Facebook Pixel and how it works, please visit <u>Facebook's help section</u>.

You can object to the collection by the Facebook pixel and use of your data to display Facebook ads. To set which types of ads are displayed to you within Facebook, you can go to the page set up by Facebook and follow the instructions on the settings for usage-based advertising. The settings are platform-independent, meaning that they are applied to all devices, such as desktop computers or mobile devices. You can further object to the use of cookies that are used for reach measurement and advertising purposes via the deactivation page of the network advertising initiative and additionally the US website aboutads.info or the European website youronlinechoices.com.

Outbrain Inc.:

This website uses technology from Outbrain Inc. ("Outbrain", 39 W 13th Street, New York, NY 10011, USA). This technology makes it possible to specifically target those internet users with advertising who have shown interest in our content, across the websites of our partners. The technology is based on a cookie-dependent analysis of previous user behavior. These ads are shown only in Outbrain advertising spaces, either through Outbrain Engage or the Outbrain Extended Network.

The processing of your data is carried out based on Art. 6(1)(a) GDPR, with your consent. If you do not wish to receive interest-based advertising, you can deactivate this feature [here]. Further information can be found here: https://www.outbrain.com/legal/privacy#privacy-policy

8.14.2. Legal basis

Google Analytics, Google Analytics Remarketing, Google Ads and Google Conversion-Tracking:

The legal basis for the use of Google Analytics is your consent, Art. 6 para. 1 lit. a GDPR by activating it via our cookie banner. You can change this consent at any time. To do so, click on the "Cookie settings" link at the very bottom of the website footer.

Alternatively, you can delete your cookies (all or only from this website). The banner with the selection options will then be displayed again.

You also have the option of selecting the types of Google ads or deactivating interest-based ads on Google via the ad setting (https://adssettings.google.com/authenticated?hl=de).

8.14.3. Retention Period

The retention of Google Analytics cookies and the use of this analysis tool are based on Art. 6 (1) lit. f of the GDPR. The website operator has a legitimate interest in analyzing user behavior in order to optimize both its website and its advertising. If a corresponding consent has been requested (e.g. consent to the retention of cookies), the processing is carried out exclusively based on Art. 6 para. 1 lit. a GDPR; the consent can be revoked at any time.

Google Analytics stores cookies in your web browser for a period of **two years** since your last visit. These cookies contain a randomly generated user ID with which you can be recognized during future website visits.

The recorded data is stored together with the randomly generated user ID, which enables the evaluation of pseudonymous user profiles. This user-related data is automatically **deleted after 14 months**. Other data remains stored in aggregated form indefinitely.

This website uses the IP anonymization option offered by Google Analytics. Your IP address will therefore be shortened/anonymized by Google as soon as Google receives your IP address. On our behalf, Google will use this information for the purpose of evaluating your use of the website, compiling reports on website activity and providing other services relating to website activity and internet usage to us. The IP address transmitted by your browser as part of Google Analytics will not be merged with other data by Google.

You may refuse the use of cookies by selecting the appropriate settings on your browser, however, please note that if you do this you may not be able to use the full functionality of this website. In addition, you can prevent the collection of the data generated by the cookie and related to your use of the website (including your IP address) to Google as well as the processing of this data by Google by downloading and installing the browser plug-in available at the following link: https://tools.google.com/dlpage/gaoptout?hl=de.

8.15. Social Plugins from Facebook, Twitter, and Instagram

Our website uses so-called social plugins ("plugins") from the social networks Facebook and the microblogging services Twitter and Instagram. These services are provided by the companies Facebook Inc., Google Inc., Twitter Inc., and Instagram LLC ("providers").

Facebook is operated by Facebook Inc., 1601 S. California Ave, Palo Alto, CA 94304, USA ("Facebook"). An overview of the Facebook plugins and their appearance can be found here: https://developers.facebook.com/docs/plugins

Twitter is operated by Twitter Inc., 1355 Market St, Suite 900, San Francisco, CA 94103, USA ("Twitter"). An overview of the Twitter buttons and their appearance can be found here: https://about.twitter.com/en_us/company/brand-resources.html

Instagram is operated by Instagram LLC., 1601 Willow Road, Menlo Park, CA 94025, USA ("Instagram"). An overview of the Instagram buttons and their appearance can be found here: http://blog.instagram.com/post/36222022872/introducing-instagram-badges

When you visit a page of our website that contains such a plugin, your browser establishes a direct connection to Facebook, Twitter or Instagram servers. However, only if you have given your consent to this on the cookie banner. The content of the plugin is then transmitted directly to your browser by the respective provider and integrated into the page. By integrating the plugins, the providers receive the information that your browser has accessed the corresponding page of our website, even if you do not have a profile or are not currently logged in. This information (including your IP address) is transmitted by your browser directly to a server of the respective provider in the USA and stored there.

If you are logged in to one of the services, the providers can directly assign your visit to our website to your profile on Facebook, Twitter or Instagram. If you interact with the plugins, for

example by clicking the "Like", "+1", "Tweet" or "Instagram" button, the corresponding information is also transmitted directly to a server of the provider and stored there. The information will also be published in the social network, on your Twitter or Instagram account and displayed there to your contacts.

The purpose and scope of the data collection and the further processing and use of the data by the providers, as well as your rights in this regard and setting options for protecting your privacy, can be found in the providers' data protection notices.

Data protection information of Facebook: ttps://www.facebook.com/policy.php

Data protection information of Twitter: https://twitter.com/privacy

Data protection information of Instagram: https://help.instagram.com/155833707900388/

If you do not want Facebook, Twitter or Instagram to directly assign the data collected via our website to your profile in the respective service, you must log out of the corresponding service before visiting our website. You can also completely prevent the loading of the plugins with addons for your browser, e.g. with the script blocker "NoScript" (http://noscript.net/).

8.16. Hyperlinks & iFrames

Our website contains so-called **hyperlinks** to websites of other providers. When you activate these hyperlinks, you will be redirected directly from our website to the website of the other provider. You can recognize this, among other things, by the change in the URL.

We cannot take responsibility for the confidential handling of your data on these thirdparty websites, as we have no influence over whether these companies comply with data protection regulations. Please inform yourself directly on these websites about how your personal data is handled by these companies.

Within the WWF website (www.wwf.at), content from external news sites that we recommend and that is related to our campaigns is displayed as a reading suggestion using so-called **full-page iFrames**. The respective site operators are responsible for the content of the embedded news pages.

8.17. Events

8.17.1. Type and Scope of Data Processing

As part of the organization and execution of internal and external events, we process, in particular, the following categories of personal data of participants:

- The personal data you provide during registration for an event, such as your name, professional and private contact details, employer, and any voluntarily disclosed allergies or intolerances
- Information (e.g., name and email address) obtained from publicly available sources (e.g., public websites)
- Photo, audio, and video recordings: These are regularly taken during events for documentation purposes and may be published in internal and external media and publications. See also section 8.9 "Photo and Video Recordings".

• Other personal data provided in the course of event participation or generated as a result of your participation (e.g., time data related to event attendance), including automatically created and archived text documents (such as correspondence)

We will not share your collected personal data with third parties without your consent, unless it is necessary to fulfill our obligations or is legally required.

We engage data processors (service providers) to process personal data (e.g., event agencies). These processors are contractually obligated to comply with data protection regulations. As part of international projects, recipients may be located in countries outside the European Union ("third countries"), where the applicable law does not ensure the same level of data protection as in your home country. In such cases, data is transferred only in accordance with legal requirements, such as:

- A European Commission adequacy decision
- Appropriate safeguards (e.g., EU Standard Contractual Clauses)
- Participation in an approved certification mechanism (e.g., EU-US Privacy Shield)
- Binding corporate rules under Article 47 GDPR
- An exemption under Article 49 GDPR (e.g., explicit consent after being informed about potential risks due to lack of adequate safeguards or decisions)

8.17.2. Legal Basis

The legal basis for data processing is Article 6(1)(a) GDPR (your consent) or Article 6(1)(f) GDPR (legitimate interests of the controller: organizing and managing internal and external events as well as reporting).

Special categories of personal data (e.g., allergies) are processed only based on your explicit consent.

For children and adolescents under the age of 16, data is always processed with the consent of their legal guardians.

The processing of personal data is necessary to achieve the aforementioned purposes. If the required data is not provided or cannot be collected, participation may not be possible. You have the right to access, rectify, erase, or restrict your personal data, the right to object, the right to data portability, and the right to withdraw your consent at any time.

8.17.3. Retention Period

Unless an explicit retention period is specified at the time of data collection (e.g., via a consent form), your personal data will be deleted or anonymized once it is no longer required for the purpose for which it was collected, and there are no legal retention obligations (e.g., commercial or tax laws) or claims being asserted that prevent deletion.

8.18. Facebook Fan Page

This section informs you about the type, scope, and purpose of processing personal data of all visitors to our Facebook Fan Page: https://www.facebook.com/WWFOesterreich (hereinafter referred to as the "Fan Page").

The purpose of the Fan Page is to provide information about our projects and organization, and to attract new supporters and interested parties. Facebook users can also contact us via the Fan Page. To operate this Fan Page, we have entered into a joint controllership agreement with Facebook Ireland Ltd. (4 Grand Canal Square, Grand Canal Harbour, Dublin 2, Ireland) under Article 26 GDPR. This means that we are jointly responsible with Facebook for data processing in

connection with the Fan Page. Details on the division of responsibilities can be found here: https://www.facebook.com/legal/terms/page_controller_addendum

However, Facebook has primary responsibility for data processing. Facebook's privacy policy and further information can be found here:

- https://www.facebook.com/privacy/explanation
- https://www.facebook.com/policy.php

To exercise your GDPR rights regarding Facebook, you can contact their data protection officer at: https://www.facebook.com/help/contact/540977946302970 and adjust your Facebook profile settings accordingly: https://www.facebook.com/help/568137493302217

During our communication, and depending on your privacy settings, we may see who likes our posts, subscribes to our updates, or leaves comments on our Fan Page.

The **legal basis for this processing** is our legitimate interest under Article 6(1)(f) GDPR: Facebook, as a globally relevant platform, plays an important role in our public outreach, enabling us to interact with interested individuals, share information, and attract new supporters. You can object to this data processing at any time by adjusting your privacy settings.

Facebook also provides statistical data through the "Insights" function. This helps us assess the reach of our Fan Page and tailor it to our audience's needs.

We only receive **anonymized data** (non-personal) and can analyze it using filters. This function cannot be disabled, but filters allow some control.

In contrast to our anonymized data processing, Facebook processes personal data for market research and advertising purposes — for example, to deliver targeted ads based on user profiles. More information is available at: https://www.facebook.com/iq/tools-resources/audience-insights

The legal basis for using the "Insights" function is again our legitimate interest under Article 6(1)(f) GDPR: It helps us address our audience more effectively and optimize communication with minimal wastage. You can object to this data processing by contacting Facebook.

Important note on data transfers to the USA:

Using Facebook or maintaining an account involves data transfers to the USA. We cannot influence this data transfer, and *thus your use of Facebook implies explicit consent under Article* 49(1)(a) GDPR for such a transfer.

According to current EU rulings, there is no adequacy decision or sufficient safeguards for data transfers to the USA.

This means there are risks: U.S. surveillance laws may grant authorities broad access to personal data, and EU citizens do not have the same legal remedies in the U.S.

Please consider this risk when using Facebook.

8.19. Facebook Ads

We run advertisements on Facebook to raise awareness about our work. Interested users can enter their name, email address, and telephone number if they wish to receive more information about our activities.

We process this data both electronically and by phone for fundraising purposes.

Once a user submits their details via an ad, Facebook forwards this data to us, along with additional campaign information, such as:

- Campaign name
- Identifier of the form used
- Platform where the ad appeared
- Name and identifier of the ad
- Date and time the data was submitted

Please also refer to Facebook's Data Policy and Privacy Statement, as well as our information regarding the Facebook Fan Page.

The legal basis for this data processing is the consent of Facebook users under Article 6(1)(a) GDPR. You may withdraw your consent at any time and request deletion of your data. Please note that withdrawal of consent does not affect the lawfulness of processing carried out prior to the withdrawal.

9. Data security and security measures

We are committed to protecting your privacy and treating your personal data confidentially.

In order to prevent manipulation, loss or misuse of your data stored with us, we take extensive technical and organizational security precautions which are regularly reviewed and adapted to technological progress. These include, among other things, the use of recognized encryption procedures such as Secure-SSL.

However, we would like to point out that, due to the structure of the Internet, it is possible that the rules of data protection and the above-mentioned security measures are not observed by other persons or institutions not within our sphere of responsibility. In particular, data disclosed unencrypted - e.g. if this is done by e-mail - can be read by third parties. We have no technical influence on this and therefore recommend using our contact form when contacting us regarding donations and the transmission of your personal data.

It is the user's responsibility to protect the data he or she provides against misuse by encrypting it or in any other way.