

## PRIVACY POLICY – CRM

Purpose	To inform data subjects about International Council of Nurses (“ICN”) processing personal data in the Customers Relations Management (CRM) system, in compliance with Applicable Data Protection Laws.
Scope / Audience	Members of NNAs, ICN staff and affiliates, ICN stakeholders, partners, service providers, organizations and individuals who have expressed an interest in working with ICN
Category	Operations
Approval date	2025
Effective date	Immediately
Review date	2028 or earlier if required
Review authority	Governance / Operations

### 1 Purpose of this Policy

The purpose of this Privacy Policy (hereinafter “**the Policy**”) is to describe how ICN processes and protects personal data of members of NNAs, ICN staff and affiliates, ICN stakeholders, partners, service providers, organizations and individuals who have expressed an interest in working with ICN or any other individual (hereinafter “**you**”; “**your**”) whose personal data are being processed, stored and managed in the Customer Relationship Management platform provided by [Zoho Corporation](#), that ICN is using as a processor (hereinafter “**the CRM**”).

The processing of Personal Data by ICN is subject to the Swiss Federal Act on Data Protection (“FADP”) and the European General Data Protection Regulation (EU) 2016/679 (“GDPR”), hereinafter “**Applicable Law**”.

## 2 Definitions

**Personal data:** Any information relating to an identified or identifiable natural person. This can include details such as name, address, email, telephone number, age, gender, marital status, bank details, and identification documents.

**Processing:** Any operation or set of operations performed on personal data, whether or not by automated means. This includes collection, recording, organization, structuring, storage, adaptation, alteration, retrieval, consultation, use, disclosure, dissemination, alignment, combination, restriction, erasure, or destruction of personal data.

**Data controller:** The entity that determines the purposes and means of processing personal data. In this Policy, ICN is the data controller.

## 3 Policy statement

ICN is committed to complying with Applicable Law and the protection and confidentiality of your Personal Data. ICN would like you to be well informed of the gathering and use of your information through our CRM and commits to:

- Use & collect Personal Data only for the purposes indicated in this Policy;
- Keep your Personal Data no longer than is necessary for these purposes
- Inform you in a clear and transparent manner about how ICN uses your Personal Data and of your rights.

## 4 Disclosure about processing of personal data

### 1. Identity of the Data controller

The International Council of Nurses, 3 place Jean-Marteau, 1201 Geneva, Switzerland, is the data controller for the personal data concerned in this Policy (hereinafter “**ICN**”, “**we**”, “**our**” or “**us**”). The CRM is the data processor for the Personal Data concerned in this Policy. More information about the CRM’s data protection and security practices can be found here: [Zoho – Privacy Policy](#)

### 2. On what legal grounds do we process your Personal Data?

We collect and process personal data only where such processing is necessary for our legitimate interests, i.e. to manage our relationship with you as members or stakeholders of our organisation, where those interests are not overridden by your data protection interests or fundamental rights and freedoms. Otherwise, we will process your personal data where we have a legitimate interest to do so.

We may also process your personal data to comply with legal obligations.

### **3. For what purposes do we collect your Personal Data?**

1. To manage your membership and our relationship with you;
2. To communicate with you, for example, to invite you to our in-person or virtual events
3. To share updates regarding ICN's programmes and activities
4. To conduct internal data analytics and statistics, allowing us to improve our services and your experience as a stakeholder
5. To issue and store membership invoices, as well the invoicing data, and manage membership fees

### **4. What kind of Personal Data do we collect?**

Personal data you provide voluntarily:

- Name, salutation, date of birth, nationality
- Company or companies of affiliation and professional title(s)
- Gender (on a voluntary basis)
- Personal address
- Personal email address and phone number (only if provided voluntarily)
- Resume or any biographical material
- Content of emails (if such content includes personal data about you)
- Profile picture (if applicable)
- Content of agreements signed between you and ICN

The Personal Data above can be added by you voluntarily, to update your CRM profile page. However, to fulfil the purposes identified in this Policy, we may ask you to fill out certain required information.

Personal data the CRM collects automatically:

You will find more information on Zoho's cookie policy via this link:

<https://www.zoho.com/privacy/cookie-policy.html>

### **5. Your Data protection rights**

Pursuant to Applicable Laws, you have the following rights:

- Right of access to information about the personal data an entity holds about you, including the purpose of processing and the recipients of the data.
- Right to be informed of how your personal data is being used. This Policy is intended to provide such information.
- Right to withdraw consent: where personal data is processed based on consent, consent may be withdrawn at any time.
- Right to request ICN to rectify inaccurate Personal Data and to complete incomplete Personal Data.
- Right to restrict processing of your Personal Data, if permitted by law.
- Right to erasure/deletion, unless a legal basis or the legitimate interests of ICN require or permit it to retain the data.
- Right to object to processing on grounds relating to your particular situation.
- Right to "data portability", i.e. receive your Personal Data in a structured, commonly used, and machine-readable format, and to transmit that data to another controller, when the processing of data is processed automatically, based on consent or contract.
- Right to lodge a complaint with the Federal Data Protection and Information Commissioner (FDPIC), the Swiss data protection authority or another relevant data protection authority as appropriate if you are not satisfied with the way in which your Personal Data is processed.

All Personal Data requests listed above are to be submitted via email to the Contact as defined within this Policy.

## **6. Disclosure of Personal data**

We take care to allow access to Personal Data only to those who require such access to perform their tasks and duties, and to third parties who have a legitimate purpose for accessing it.

ICN may disclose personal data to its suppliers, i.e. the CRM, in order to perform its duties and provide its services, provided that legal requirements are met.

## **7. Transfers of Personal data outside Switzerland/EU/EEA**

Your personal data is stored in Zoho datacentres in the EU

<https://www.zoho.com/know-your-datacenter.html>

We may transfer your personal data to third-party service providers who are located outside Switzerland, or who are storing or accessing your data from outside Switzerland. Where that is the case, ICN will implement appropriate or

suitable safeguards to ensure that an adequate level of protection is provided to personal data that is transferred to countries that do not offer adequate protection in relation to Personal Data, in accordance with Applicable Law.

## **8. How do we secure your Personal Data?**

Your Personal Data is protected against unauthorized processing by organizational and technical measures in line with international norms, quality standards and technical progress, in particular against the risks of falsification, destruction, theft, loss, copying and other unauthorized processing.

ICN takes reasonable and appropriate measures to maintain the confidentiality, integrity and traceability of Personal Data and to prevent unauthorized use or disclosure of personal data in accordance with Applicable Law.

More information about the CRM security measures can be found here: [Security Whitepaper - Zoho](#).

## **9. For how long do we keep your Personal Data?**

We retain your personal data as long as necessary to fulfill the purposes described in this Policy, i.e. as long as we need to manage our relationship with you. For example, we may retain Personal Data we obtain from you where we have an ongoing legitimate business need to do so (for example, to manage our relationship with you or to provide you with service(s) you have requested).

We may also retain your Personal Data if you have expressed a clear interest in ICN's activities, to fulfil the purposes outlined in this Policy.

When we no longer need to use or retain the Personal Data, we delete it from the CRM or anonymize it so that it is no longer possible to identify the Data Subjects concerned.

## **5 Updates to this Policy**

This Policy may be updated to reflect any necessary changes in our privacy practices. In such cases, we will inform you and indicate at the top of the Policy when it was most recently updated.

## **6 Contact Information**

If you have any questions regarding this Policy and to exercise your Data Subject rights, an email can be sent to the following address: [zohoadmin@icn.ch](mailto:zohoadmin@icn.ch).