



WWF Germany („WWF Germany”, „we”, „us” or „our”) takes the protection of personal data very seriously and understands that our visitors of your websites („you“ or „your”) are concerned about maintaining the privacy and security of their personal data that we might receive and process. For this reason, we would like to inform you with this Privacy Policy (“Privacy Policy”) how we process your personal data when you register or visit our website, <https://riskfilter.org/> (the “Website”) or engage with us to use the products or services that WWF provides in relation to the WWF Risk Filter Suite (our “Services”).

The general privacy policy for the WWF Germany can be accessed under the following link:

Link to privacy policy (<https://www.wwf.de/spenden-helfen/datenschutz>)

The privacy policy of the WWF Germany linked above includes all information on the processing of personal data that concerns the WWF Germany in general, including the Risk Filter Suite website. However, some specific aspects arise from our website, which is why personal data is processed here – in addition to the information of the general privacy policy linked above – as follows:

I. Controller and data protection officer

This Privacy Policy explains our approach to any personal information that we collect from you or which we have obtained about you from a third party and the purposes for which we process your personal information. It also sets out your rights in respect of our processing of your personal information.

1. Who we are and how to contact us

The controller in the meaning of Art. 4 (7) of the EU General Data Protection Regulation ("GDPR") for this website is:

WWF Germany

A Civil Law Foundation
Reinhardtstr. 18
10117 Berlin
Phone: 030 311777-0
Fax: 030 311777-199
E-Mail: info@wwf.de

If you have any questions about this Privacy Policy or want to exercise your rights set out in this Privacy Policy, please contact us. You can either send us an email, call us or write to the postal address provided.

2. Our Data Protection Officer

If you have any questions regarding the processing of your personal data or this Privacy Policy, you can contact our Data Protection Officer at:

WWF Germany

Data Protection Officer
Reinhardtstr. 18



10117 Berlin
Phone: 030 311777-0
datenschutz@wwf.de

Please mark all correspondence with “Data Protection Officer”.

II. Data subject rights

You have the right to receive information about your stored data from WWF free of charge.

Right of access:

You have the right to obtain confirmation from us as to whether or not your personal data is being processed and a right to access your personal data that is being processed by us.

Right of rectification:

You also have the right to obtain without undue delay the rectification of any inaccurate personal data relating to you and to have any of your personal data that is incomplete completed. In case we have transferred your personal data to third parties, we will inform them about this rectification and completion if required by law.

Right to erasure ('right to be forgotten')

You have the right to obtain the erasure of your personal data from us without undue delay and we have the obligation to erase your personal data without undue delay if one of the following grounds applies:

- your personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed;
- the processing of your personal data is based solely on your consent and you have withdrawn your consent;
- you have objected to direct marketing;
- you have objected to the processing that is based on our legitimate interest on grounds that relate to your particular situation and there are no overriding legitimate grounds for the processing;
- your personal data have been unlawfully processed;
- your personal data have to be erased for compliance with a legal obligation

In case we have transferred your personal data to third parties, we will inform them about this erasure if required by law.

Please keep in mind that there are limitations to your right to erasure. We are for example not allowed to erase data that we are legally obliged to store (namely due to statutory retention periods). Also, your right to erasure does not apply if we need to store the data for the establishment, exercise or defence of legal claims.

Right to restriction of processing:

You have the right to restrict our processing of your personal data where

- you contest the accuracy of the personal data until we have taken sufficient steps to correct or verify its accuracy;
- the processing is unlawful but you do not want us to erase the data;
- we no longer need your personal data for the purposes of the processing, but you require them for the establishment, exercise or defence of legal claims; or
- you have objected to processing based on our legitimate interest (see below) pending verification as to whether we have compelling legitimate grounds to continue processing.

Where personal data is subjected to restriction in this way, we will only process it with your consent or to a very limited extent, e.g. for the establishment, exercise or defence of legal claims.

Right to withdraw consent

If we rely on your consent as our legal basis for processing your personal data, you have the right to withdraw your consent at any time. The withdrawal of your consent shall not affect the lawfulness of processing based on consent before its withdrawal.

Rights to object:

You have the right to object to the processing of your personal data that is based on our legitimate interest, on grounds to your particular situation, at any time. We will no longer process your personal data, except if we can demonstrate compelling legal grounds for the processing. If we are processing your personal data for direct marketing purposes, we will no longer process your personal data in any case.

You may address your objections to:

WWF Germany

A Civil Law Foundation
Reinhardtstr. 18
10117 Berlin
Phone: 030 311777-0
Fax: 030 311777-199
E-Mail: info@wwf.de

or to our Data Protection Officer:

WWF Germany

Data Protection Officer
Reinhardtstr. 18
10117 Berlin

Phone: 030 311777-0
datenschutz@wwf.de

Right to Data portability:

Where we are relying upon your consent or the fact that the processing is necessary for the performance of a contract to which you are party as the legal basis for processing, and that personal data has been provided by you and is processed by automated means, you have the right to receive all such personal data which you have provided to us in a structured, commonly used and machine readable format, and also to require us to transmit it to another controller where this is technically feasible.

Right to lodge a complaint with the Supervisory Authority:

You have the right to lodge a complaint with a Supervisory Authority. You can appeal in particular to the Supervisory Authority, which is competent for your place of residence or your state, your place of work or of an alleged infringement of the GDPR. You can also appeal to the Supervisory Authority which is competent for us. This is:

Berlin Commissioner for Data Protection and Freedom of Information
Friedrichstr. 219
10969 Berlin

Additional details can be found on WWF Germany Legal Notice page.

You may exercise your rights in connection with the processing through our website by contacting us via the contact details supplied in section „Controller” or in section „Data Protection Officer”.

Please ensure for this purpose that a clear identification of your person is possible for us.

III. Processing of personal data

According to Art. 4 (1) GDPR, personal data is all information relating to an identified or identifiable natural person (for example: name, date of birth or e-mail address). If your personal data is processed, this means that we collect, store or use it, for example (Art. 4 (2) GDPR).

We may collect personal information from you in the course of providing our Website, our Services, including through your use of our Website, when you contact or request information from us, when you register or when you engage our Services.

1. Visiting of the website

When calling up the website technically necessary personal data is processed in order to display the content accordingly. We also process personal data to help us improve and develop our services.

In particular, the following personal data is processed via the browser:

- The pseudonymized IP address.
- Geographic information.

- Entered search terms.
- The videos that were viewed.
- Date, time and duration of access of the Website.
- Internet address of the website from which the online offer is accessed (so-called URL of origin or referrer URL).
- Name of the service provider through which access to the online offer occurs.
- Type of action or query performed on the online offer.
- Name of accessed file or information.
- Amount of data transmitted.
- Operating system and information on the Internet browser used, including add-ons installed (e.g., for the Flash Player).
- Status or error codes (e.g. „request successful” or „file not found”).

The legal basis for the above processing is Art. 6 para. 1 lit. f GDPR. The WWF has an interest in ensuring the content and technical usability of the website. The website cannot be offered to users without the processing in question. Likewise, there is an interest in the technical security and availability of the website. Furthermore, the WWF has an interest in the improvement of the given services.

In principle, the aforementioned data is deleted after the end of the respective session. If there is reason to assume unauthorized or criminal access (for example, through hacking), certain categories of data (for example, log files) may be stored longer to clarify the incidents.

If legal retention periods exist, the data may be stored for the correspondingly prescribed period (retention obligations).

2. Registration / provision of an account

You can register to use the tools and functions on our website. The data processing takes place to provide you with an account.

The following categories of personal data are processed in this context:

- First Name, Last Name
- User Organization Information including the name of the organization you work for, the type of organization you work for (e.g., Business, Financial Institution, Consultancy, etc.), and the country of your organization’s headquarter.
- E-Mail Address

After completing and submitting the registration form, you will receive a confirmation e-mail with an activation link. Registration is complete when you click the activation link.

The legal basis for the above-mentioned processing of the required data categories is Art. 6 (1) (b) GDPR. Registration is voluntary and takes place to fulfill the terms of use.

The data collected will be stored for the duration of the account's existence. The account can be deleted at any time.

Insofar as there are statutory retention periods, the data may be stored for the correspondingly prescribed period (retention obligations).

3. Login

After activating the account, you can log-in.

In particular, the following personal data is processed:

- e-mail address
- password

The legal basis for the above-mentioned processing of the required data categories is Art. 6 (1) (b) GDPR. Login and registration are voluntary and to fulfill the terms of use.

The data collected will be stored for the duration of the account's existence. The account can be deleted at any time.

Insofar as there are statutory retention periods, the data may be stored for the correspondingly prescribed period (retention obligations)

4. Feedback Form

Using the feedback function, an e-mail can be sent to us via the feedback form. Data processing takes place for communication and answering inquiries.

The following categories of personal data are processed here:

- First Name, Last Name
- E-mail address
- Topic
- Message content

The legal basis for this within the context of the contact function is Art. 6 (1) (f) GDPR. The legitimate interest of the WWF lies in answering the request. Insofar as the fulfilment of contractual obligations is covered by the request, the legal basis is Art. 6 (1) (b) GDPR.

The collected data will be kept for the fulfillment of the respective purpose.

Insofar as there are statutory retention periods, the data may be stored for the correspondingly prescribed period (retention obligations).

5. Newsletter

We would like to inform you regularly with our newsletter about current topics and our projects. You can register to our newsletter on the website.

The following categories of personal data are processed here:

- E-mail address

The legal basis for this is Art. 6 para. 1 lit. a GDPR. Registration for the newsletter is voluntary via a checkbox and subsequently within the scope of a confirmation link via email.

There is the possibility to revoke the consent at any time with effect for the future. The lawfulness of the data processing for the period until the revocation remains unaffected by this. Please send an informal revocation to riskfilter@wwf.de or click the link included in every message we send.

Insofar as there are statutory retention periods, the data may be stored for the correspondingly prescribed period (retention obligations).

6. Improvement of website content

We collect statistical information about the use of this website. For further information please refer to our [Cookie Policy](#).

The following categories of personal data are processed here:

- The pseudonymized IP address.
- Geographic information.
- Entered search terms.
- The videos that were viewed.
- Date, time and duration of access of the Website.
- Internet address of the website from which the online offer is accessed (so-called URL of origin or referrer URL).
- Name of the service provider through which access to the online offer occurs.

- Type of action or query performed on the online offer.
- Name of accessed file or information.
- Amount of data transmitted.
- Operating system and information on the Internet browser used, including add-ons installed (e.g., for the Flash Player).
- Status or error codes (e.g. „request successful” or „file not found”).

The legal basis for this within the context of the contact function is Art. 6 (1) (f) GDPR. The WWF has a legitimate interest in analysing the usage of the website in order to continuously improve it and to customise it to our users’ needs.

The collected data will be kept for the fulfillment of the respective purpose.

Insofar as there are statutory retention periods, the data may be stored for the correspondingly prescribed period (retention obligations).

IV. Recipients of personal data / Third parties

1. Service Provider

Except as set out in this Privacy Policy, we do not sell, trade, or otherwise transfer your personal data to outside parties. We provide access to or share your personal data with our service provider, Indivee GmbH, Andreasstraße 66, 10243, Berlin, Germany, who perform services on our behalf. Indivee GmbH provides software development and maintenance of the WWF Risk Filter Suite Website. We have signed with our service provider respective contracting obligations providing at least the same level of data protection as WWF Germany does. Indivee GmbH acts only as so-called data processor on our behalf and subject to our instructions.

2. Third Parties

We also may disclose your personal data to trusted third parties who assist us in conducting our business, so long as those parties agree to keep this information confidential and to fulfill the requirements of the EU General Data Protection legislation or similar legislation:

- If it is necessary for us to perform our obligations in accordance with any contract that we may have with you.
- To external auditors in the event of audits or investigations, if there is a legal requirement or legitimate business interest to do so;
- If we are required to do so by law, statute, regulation, or professional standard, or to respond to a subpoena, search warrant, or other legal request, in response to law enforcement authority or other government official request.

The legal basis for data transfer to third parties is Art. 6 (1) (c) GDPR. In individual cases, Art. 6 (1) (a) GDPR (if consent is given) or Art. 6 (1) (b) GDPR (to fulfill a contract) may also be relevant. If a

transmission takes place within the scope of the legitimate interest, Art. 6 (1) (f) GDPR is the relevant legal basis.

3. Transfers of your data to countries outside the EEA

We might transfer personal data to our service provider located outside the European Economic Area („EEA“) to provide our Services. We ensure prior to the transfer that it is subject to appropriate safeguards, for example by entering into so-called standard contractual clauses of the European Union with the recipient (Art. 46 GDPR) and fulfilling all requirements of the standard data protection clauses.

V. Links to other Websites

On our website there are links to external websites and web offers of other providers.

As far as these links are followed, you will reach other websites, which are not in the area of responsibility of the WWF (Controller). The contents and data processing there are the responsibility of the respective providers.

More detailed information can be found in the privacy notices of the other websites.

VI. Cookies

Please refer to our cookies policy for more information on the cookies we use and the related processing of personal data:

[Link to Cookie Policy](#)

VII. Changes to our Privacy Policy

We reserve the right to amend this Privacy Policy at any time to reflect changes in the law, our data collection and use practices, or advances in technology. We will make the revised Privacy Policy available on our websites. If we make a material change to the policy we will provide you with an appropriate notice in accordance with legal requirements where it is practicable. Our registered users will be informed about the changes beforehand. Potential data processing falls under the legal basis Art. 6 para. 1 lit. f GDPR.