

Data Protection Policy



ClientEarth is committed to conducting its business in accordance with international data protection laws, regulations, and best practices. This Policy sets out the governing principles and processes for ClientEarth’s protection, collection, use, retention, transfer, disclosure, and destruction of Personal Data.

This Policy has been approved by ClientEarth’s Executive Team, and reflects our values.

Values	Application in this Policy
Acting courageously	<ul style="list-style-type: none">We are careful to protect the data of staff, funders and partners. We report data breaches or near misses and any concerns regarding information security promptly.
Prizing diverse experience	<ul style="list-style-type: none">We apply significant safeguards to collection of any special category data, which may be collected to support the needs of a diverse ClientEarth staff
Embracing collaboration	<ul style="list-style-type: none">We work with individuals and our Partners to ensure data is collected, processed, and retained no longer than is necessary and used for the intended purposes only
Learning continuously	<ul style="list-style-type: none">We consider personal data breaches or near misses as an opportunity to identify weaknesses, and to improve our policies and practices. Staff learning ensures ethical and lawful practices in ClientEarth’s work.
Opposing injustice	<ul style="list-style-type: none">We apply best practices in data protection to ensure lawful, transparent and fair use of personal data to protect individuals from harm.
Focusing on impact	<ul style="list-style-type: none">We undertake lawful data collection and use which maximises our impact

What is the Scope of this Policy?

This Policy applies to all ClientEarth entities and staff worldwide, including all governance and management board members, who are expected to use best judgment in applying this Policy, and to play an active part in preventing non-compliance and in promoting best practices. Any breach of this Policy will be taken seriously and may result in appropriate action under local law (including disciplinary).

This Policy is also applied by ClientEarth vis-a-vis those associated or those who work with ClientEarth in some way, e.g., Partners or Funders, and our reporting channel is open to them, as well as to the public at large. This Policy is publicly accessible to all, as well as **TellUs**, our reporting channel, available on [Transparency | ClientEarth](#).

This Policy applies to the processing of Data Subjects’ Personal Data in physical and electronic form, in the context of ClientEarth’s activities. This Policy is based on globally accepted principles relating to data protection, considering the fundamental principles of GDPR as the baseline standard, and taking into account stricter or additional requirements of applicable national laws.

ClientEarth’s Principles-Based Approach to Data Protection

Principle 1: ClientEarth is lawful, fair, and transparent in our processing of Personal Data

ClientEarth will process Personal Data lawfully, fairly, and in a transparent manner. ClientEarth is transparent about our processing of Personal Data, through privacy notices, publication of this Policy,



using fully informed consent procedures, and being responsive to any queries related to personal data or processing. We will only process Personal Data fairly and for the purpose for which it was given to us and with a lawful basis.

Principle 2: ClientEarth processes Personal Data in compliance with purpose limitation and data minimisation

ClientEarth will only collect personal data for legitimate purposes, will expressly specify exactly what any Personal Data it collects will be used for, and will limit the processing of that Personal Data to only what is necessary to meet the specified purpose, and never in a manner that is incompatible with or beyond those purposes (purpose limitation). ClientEarth will only collect and process Personal Data that is adequate, relevant, and limited to what is necessary in relation to the purpose for which they are processed, and not store any Personal Data beyond what is required (data minimisation).

Principle 3: ClientEarth adheres to storage limitation rules for Personal Data

ClientEarth will keep Personal Data in a form that allows for the identification of Data Subjects for no longer than is necessary for the purposes for which the Personal Data is processed. ClientEarth will, where possible, store Personal Data in a way that limits or prevents identification of Data Subjects.

Principle 4: ClientEarth is committed to accuracy, integrity, and confidentiality in the processing of Personal Data

ClientEarth will adopt procedures for identifying and addressing outdated, incorrect, and redundant Personal Data (accuracy and integrity). ClientEarth will process Personal Data in a manner that ensures appropriate security of the Personal Data, including protection against unauthorised or unlawful processing, and against accidental loss, destruction, or damage, with the appropriate technical and organisational measures (confidentiality).

Principle 5: ClientEarth supports Data Subjects to exercise their rights as to Personal Data

ClientEarth is mindful that any individual has rights in relation to their Personal Data held ClientEarth, e.g., right to obtain copies, request changes, restrict processing, request deletion, among others. All Staff need to know how to recognise a request for Personal Data and how to escalate the request properly internally.

Principle 6: All concerns relating to Personal Data Breaches should be reported immediately

Where staff, Partners, Funders, or any member of the public are aware of or have concerns in relation to suspected Personal Data Breaches, they should report these immediately to our Information Security Officer, or in their absence, to our Global Head of Operations, by emailing databreach@clientearth.org.

Alternatively, reports in relation to Personal Data Breaches can be submitted (anonymously or in the complainant's name) via **TellUs**, our reporting channel, available on [Transparency | ClientEarth](#). Anyone who raises a good faith concern under this Policy is protected under our Whistleblowing Policy.

Brussels Beijing Berlin London Warsaw Madrid Los Angeles Luxembourg

ClientEarth is an environmental law charity, a company limited by guarantee, registered in England and Wales, company number 02863827, registered charity number 1053988, registered office 10 Queen Street Place, London EC4R 1BE, a registered international non-profit organisation in Belgium, ClientEarth AISBL, enterprise number 0714.925.038, a non-profit limited liability company in Germany, ClientEarth gmbH, HRB 202487 B, a registered foundation in Poland, Fundacja "ClientEarth Prawnicy dla Ziemi", KRS 0000364218, NIP 7010254208, a registered delegation in Spain, Fundación ClientEarth Delegación en España, NIF W0170741C, a registered 501(c)(3) organisation in the US, ClientEarth US, EIN 81-0722756, a registered subsidiary in China, ClientEarth Beijing Representative Office, Registration No. G1110000MA0095H836, a registered subsidiary in Japan, Ippan Shadan Hojin ClientEarth, corporate number 6010405022079, a registered subsidiary and company limited by guarantee in Australia, ClientEarth Oceania Limited, company number 664010655.