



NORWEGIAN
REFUGEE COUNCIL

Privacy Notice

NRC Speak Up System

This privacy notice concerns the Norwegian Refugee Council's (NRC) whistleblowing system, the **Speak Up system**. NRC is responsible for how your data is used in the Speak Up system (the **data controller**). The notice explains what personal data is collected about you, how and why it is collected and what we do with it.

1. Why is NRC processing your personal data?

NRC is collecting and processing your personal data because:

- you have reported a concern to the Speak Up system, or
- you are a subject of concern in a concern that has been reported to the Speak Up system, or
- you are a survivor, victim or witness in a concern that has been reported to the Speak Up system.

2. How does NRC obtain your personal data?

The personal data we process is provided to us:

- directly by you, or
- by a person who has reported a concern to the Speak Up system, and/or
- by an investigator or fact finder who is finding out what has happened in relation to a concern that has been reported to the Speak Up system.

Concerns are reported to the Speak Up system:

- using the Speak Up form, or
- using the Speak Up email (speakup@nrc.no)

If you choose to report a concern to us, you may choose to do so anonymously. You can do this by selecting the option to report anonymously on the Speak Up form. If you report anonymously, it may limit the actions we can take in some situations. If you provide your details, we will be able to provide some feedback on the actions we have taken to resolve your concern.

3. What personal data does NRC collect about you?

NRC collects and processes the following types of personal data about you:

- your name and contact details
- your relationship to NRC, for example your role or where you work, and
- information concerning your involvement, actions or behaviour relating to the concern that has been being raised.

Other types of personal data may be processed, depending on the type of concern that has been reported. It may include sensitive data, such as race, ethnic origin, religion, sexual life or orientation (e.g. in a safeguarding case), health, or financial information (e.g. in a corruption case).

4. How does NRC use your data?

NRC processes your personal data and other information provided to:

- gather further information about a concern that has been reported to us
- update the way we are dealing with a reported concern
- take appropriate action to address a reported concern, and
- identify if misconduct or an illegal act has taken place.

5. What is NRC's legal basis for processing your personal data?

The legal basis for processing your personal data include one or more of the following:

We may have a legal obligation. NRC is legally obliged to:

- investigate whistleblowing complaints made to us
- prevent and detect unlawful acts or misuse of our systems, and
- to protect the people we work with.

We may have a legitimate interest. NRC has a legitimate interest to investigate reported concerns to protect the people we work with and to protect our organisational values.

We may have a contractual obligation. NRC has contractual obligations to:

- our donors to investigate certain types of alleged behaviour and misconduct, and
- our employees to ensure they are safe.

We may have a substantial public interest. If NRC is processing sensitive data, such as religion or sexual life or orientation (special category data), NRC may have a substantial public interest to detect and prevent unlawful acts or dishonesty.

6. How will NRC treat your data?

Once NRC has received your personal data, we will ensure that it is treated with the highest integrity. Your data will only be seen by staff who are directly involved in dealing with the concern. This may include relevant members of the Integrity team (including any assigned investigators) at NRC's Head Office and other staff who are responsible for managing the case, for example, legal, safeguarding or

HR staff. Any information you share will be treated confidentially and shared sensitively, on a strictly need to know basis.

7. Will your personal data be shared with external parties?

NRC uses a technical solution called Case IQ to manage reportable concerns. NRC has a data processing agreement with this third party. Case IQ's Privacy Policy is available [here](#).

Your data may be shared if required by law, e.g. with regulators, public authorities or law enforcement, or to prevent or detect crime or dishonesty.

With your consent, your data may be shared with another agency who will provide you with support, such as a therapist.

In occasional cases, your data may be shared with an external investigator, who has been engaged by NRC to carry out an investigation into the reportable concern, in which case an appropriate data sharing agreement will be signed.

8. How will NRC store your personal information?

Your information is securely stored on Case IQ's system, which is designed for managing sensitive data and ensuring it is shared on a strictly need to know basis.

The information will be retained as follows before being deleted:

- ten years for sexual exploitation and abuse and corruption cases
- five years for other breaches of the Code of Conduct
- one year for non-reportable concerns.

9. What are your rights?

Under data protection law, you have rights including:

Your right of access - You have the right to ask NRC for copies of your personal information.

Your right to rectification - You have the right to ask NRC to rectify personal information you think is inaccurate. You also have the right to ask NRC to complete information you think is incomplete.

Your right to erasure - You have the right to ask NRC to erase your personal information in certain circumstances.

Your right to restriction of processing - You have the right to ask NRC to restrict the processing of your personal information in certain circumstances.

Your right to object to processing - You have the right to object to the processing of your personal information in certain circumstances.

Your right to data portability - You have the right to ask that NRC transfers the personal information you gave us to another organisation, or to you, in certain circumstances.

You are not required to pay any charge for exercising your rights. If you make a request, NRC has one month to respond to you.

Please contact NRC if you wish to make a request.

10. How do you contact NRC?

NRC's contact details are:

Address: Prinsens gate 2
0152 Oslo
Norway
Phone: 0047 23 10 98 00
Email: data.protection@nrc.no

11. How can you complain?

If you want to complain, you can contact NRC using the details above.

You can also complain to the [Norwegian Data Protection Authority](#) (Datatilsynet) by sending a written complaint to the following address:

Datatilsynet
PO Box 458 Sentrum
0105 Oslo
Norway

It is within NRC's absolute discretion to modify the terms of this Privacy Policy, and any such changes will be communicated via updates to this notice. It is your responsibility to periodically review this page to stay informed of any updates.