

Privacy policy

(R1, 24 May 2018)

Dyslexia International ASBL, Belgium, and Literacy International CIO, UK, are dedicated fully to comply with the requirements of the General Data Protection Regulation, coming into force on 25 May 2018.

This has entailed documenting the policies of external suppliers.

Reasons for keeping such data are continuously reviewed.

Personal data of the Friends of Dyslexia International, colleagues and collaborators are held on paper filed in our office.

Concerning electronic data, we are writing to all members of our committees and panels advising them that we hold electronic data about them. These data are used solely to conduct the activities of Dyslexia International and Literacy International. They have never been given to third parties without prior permission and have never been published on our web site.

We are satisfied that four external companies provide a high level of data protection.

This is what the EU says about non-EU countries:

‘Adequacy decisions

The European Commission has the power to determine, on the basis of article 45 of [Regulation \(EU\) 2016/679](#) whether a country outside the EU offers an adequate level of data protection, whether by its domestic legislation or of the international commitments it has entered into.

The adoption of an adequacy decision involves

- a proposal from the European Commission
- an opinion of the of the European Data Protection Board
- an approval from representatives of EU countries
- the adoption of the decision by the European Commissioners

At any time, the European Parliament and the Council may request the European Commission to maintain, amend or withdraw the adequacy decision on the grounds that its act exceeds the implementing powers provided for in the regulation.

The effect of such a decision is that personal data can flow from the EU (and Norway, Liechtenstein and Iceland) to that third country without any further safeguard being necessary. In other words, transfers to the country in question will be assimilated to intra-EU transmissions of data.

The European Commission has so far recognised Andorra, Argentina, Canada (commercial organisations), Faroe Islands, Guernsey, Israel, Isle of Man, Jersey, New Zealand, Switzerland, Uruguay and the US (limited to the [Privacy Shield framework](#)) as providing adequate protection.’

1. Mailchimp

The Dyslexia International *Newsletter* is distributed through this US organization which ensures its own privacy safeguards.

Subscribers are now clearly told that they are **opting in**. These data are not distributed to third parties and subscribers can opt to **Unsubscribe** at any time.

Mailchimp's Privacy Policy may be read here:

<https://mailchimp.com/legal/privacy>

2. Other data in Google Drive

Some historical data in the form of mailing lists and contacts were archived in a Google Drive in 2017. Again, these data will not be given to third parties. We are in a process, starting in May 2018, of eliminating these documents on Google Drive but may retain some copies for our own use, secure on our own computers, or transferred to MyKnowHowCloud (see below).

Here is part of Google's policy:

Compliance and cooperation with regulatory authorities

'We regularly review our compliance with our Privacy Policy. We also adhere to several self regulatory frameworks, including the EU-US and Swiss-US Privacy Shield Frameworks. When we receive formal written complaints, we will contact the person who made the complaint to follow up. We work with the appropriate regulatory authorities, including local data protection authorities, to resolve any complaints regarding the transfer of personal data that we cannot resolve with our users directly.'

3. Dropbox (US)

This is what Dropbox says:

We are confident we can comply with GDPR and we started working on this immediately after the legislation passed and have undertaken extensive work to examine our entire business through the lens of GDPR.

Dropbox expects to fully comply with the GDPR by 25 May 2018. GDPR does not mandate localisation of data in any geography and can apply globally, regardless of the location of data. The rules that protect European users' personal data are actually extended extra-territorially outside of Europe. This means that their personal data enjoys the same protections no matter what country in the world it is hosted in. This extension of protections has clear benefits for European data subjects and the GDPR specifically sets out several adequate safeguard mechanisms for transferring users' personal data from Europe to third countries.

Dropbox continues to offer to host business customers' files in Europe if they choose this option, however the personal data that is entrusted to us is protected equally under GDPR whether it is hosted in Europe or the US.

Dropbox works with its users to protect their personal data. We take comprehensive measures to protect our infrastructure, network, and applications, train employees in security and privacy practices, build a culture where being worthy of trust is the highest priority, and put our systems and practices through rigorous third-party testing and auditing.

However, users also play a key role in protecting their personal data. Dropbox enables you to configure, use, and monitor your account in ways that meet your organization's privacy, security, and compliance needs. Our [shared responsibility guide](#) can help you to understand more about what we do to keep your account safe and what you can do to maintain visibility and control over your personal data. Further information on our GDPR readiness is available in our GDPR Guidance Centre: <https://www.dropbox.com/security/GDPR>.

We are certified on the Privacy Shield which is in operation currently and used by many US companies to lawfully transfer data.

Dropbox servers are located in the EU and US. We continue to offer to host business customers' files in Europe if they choose this option however the personal data that is entrusted to us is protected equally under GDPR whether it is hosted in Europe or the US.

Additionally, we have information regarding where we store data in both our [Security](#) and [Privacy](#) white papers.

4. KnowHowCloud

The contract is between Dyslexia International and:

Livedrive Internet Limited
The Battleship Building
179 Harrow Road
London, W2 6NB
United Kingdom

This is their complete Privacy policy:

<https://www.tkhcloudstorage.com/privacy-policy>

Person responsible for data management:

Stewart Sanson

[stewart.sanson\(at\)dyslexia-international.org](mailto:stewart.sanson@dyslexia-international.org)

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Philip Stewart Sanson (full legal name) is registered under the UK Disclosure and Barring Service (DBA) to work with vulnerable adults and children.