



INSTITUT DE HAUTES
ÉTUDES INTERNATIONALES
ET DU DÉVELOPPEMENT
GRADUATE INSTITUTE
OF INTERNATIONAL AND
DEVELOPMENT STUDIES

Privacy policy

Preamble

As part of its academic, research and continuing education activities, the Graduate Institute of International and Development Studies (hereinafter referred to as "the Institute") may need to process your personal data.

Respecting your privacy and handling personal data responsibly and in accordance with the law are central concerns for the Institute. We ensure that personal data is processed in compliance with applicable legislation and in accordance with the principles of lawfulness, purpose, proportionality, good faith, security and transparency.

1 Scope of application

This Privacy Policy (hereinafter "Policy") is intended to inform you about how the Institute processes your personal data and about your rights in connection with such processing, in particular when you browse its website or make use of its services. This Policy provides general information and may be supplemented by more specific regulations or guidelines where applicable.

2 Terms used

The terms used in this Policy are to be understood as follows:

- **Consent:** an unambiguous expression of will, which is free, specific to a processing operation and derives from prior information, whereby in a clear and positive act a data subject agrees that his/her personal data can be processed.
- **Data controller:** any person who decides on the purpose and means of processing personal data.
- **Data processor:** a natural or legal person, public authority, agency or other body which processes personal data on behalf of the data controller.
- **Data subject:** any identifiable or identified natural person whose personal data are processed by the data controller.
- **Personal data:** any information that directly or indirectly identifies a natural person (referred to as a data subject).
- **Processing:** any operation on personal data (in particular collection, recording, use, processing, modification, storage, extraction, consultation, transmission, deletion).
- **Sensitive personal data:** certain personal data are considered sensitive: these include data on religious, philosophical, political or trade-union opinions or activities, data on health or intimacy, data on racial or ethnic origin, genetic or biometric data,

data on criminal or administrative proceedings or sanctions, and data on social welfare measures.

3 What is the applicable law on which the Institute bases its processing of your data?

We process your personal data in compliance with applicable data protection laws, in particular the Federal Act on Data Protection (FADP) of September 25, 2020 and the Data Protection Ordinance (OPDo) of August 31, 2022.

Certain processing of personal data by the Institute also falls under the General Data Protection Regulation (GDPR) pursuant to Art. 3 para. 2 of the GDPR.

4 General principles applicable to the processing of personal data

When processing your personal data, the Institute undertakes to comply with the following general principles:

- **Lawfulness principle:** the processing of personal data must be lawful;
 - **Principle of good faith:** personal data must be processed in good faith. The collection of personal data in a deceptive manner does not comply with this principle;
 - **Proportionality principle:** only personal data that is adequate, relevant and limited to what is necessary for the purposes for which it is to be processed may be processed;
 - **Principle of transparency:** the processing of personal data must be carried out in a way that is recognizable to the individual, and provide for an appropriate duty to inform;
 - **Purpose principle:** personal data may only be processed for specific purposes, which may not be changed during processing without justification;
 - **Principle of accuracy:** the Institute must ensure that the personal data it processes is accurate;
- Security principle:** the Institute takes appropriate organizational and technical measures to guarantee the integrity, confidentiality and availability of the personal data it processes.

5 Justifications for processing your personal data

At the Institute, processing may be based on the following justifications:

- The data subject's "**consent**", which enables him or her to decide freely whether or not to allow his or her personal data to be processed for the stated purpose (for example: by subscribing to a newsletter, you consent to receiving this newsletter via the e-mail address you have given us).

If consent is required for the processing of sensitive personal data, it must be express, i.e. it must be expressed explicitly and unequivocally. Consent may be withdrawn at any time, without justification. Withdrawal is valid for the future and does not retroactively affect processing carried out up to the time of withdrawal;

- **“Overriding private interest”**: where there is an overriding private interest on the part of the data subject or a third party, the Institute may process personal data (e.g. the Institute must be able to inform the emergency services of a student's name if he/she becomes unwell and needs to be treated);
- **“Overriding public interest”**: the Institute may process personal data on the basis of an overriding public interest;
- The **"law"**: the Institute may be obliged to process personal data on the basis of a legal obligation (e.g. transmission of information to cantonal or federal authorities).

6 Personal data controller

When the Institute determines the purposes and means of processing personal data, alone or jointly with others, it is considered to be the data controller.

The Institute comprises various services, departments and research centers.

Associated programs that are legally under the responsibility of the Institute and joint centers, for certain processing operations, are also subject to this personal data processing policy.

Our address is :

Geneva Graduate Institute
Chemin Eugène-Rigot 2A
P.O. Box 1672
CH- 1211 Geneva 1

The Institute has appointed the following entity as its representative within the European Union (EU) for processing subject to the GDPR:

IDEA AARPI, Avocats à la Cour
25 rue Tronchet,
75 008 Paris
France

representation.UE-IHEID@idea-avocats.com

7 Categories of data we process

As part of your use of our services, we collect and process various categories of personal data about you. This may include the following types of data:

- **Contact and identification data** such as your last name, first name, title, address, email address, telephone number, Identification number;
- **Personal data** such as date of birth, gender, nationality, place of birth, residence status, family situation, language, photo, copy of ID;
- **Data on professional life and education**: CV, training, diplomas obtained, previous studies, letters of recommendation, references;
- **Data produced for students during the course of their studies**: grades, assessments, questionnaire results;
- **HR data**: job applications, job specifications, contracts, annual appraisals, ongoing training, medical certificates, sanctions, vacations, workplace attendance;

- **Financial data** such as account information, payment information, income, tax status, stock market;
- **User account data** such as username and password;
- **Interaction and usage data** such as e-mail correspondence, chat and webinar content, information on "customer" segment (applicant, candidate, subscriber, alumni-ae) and target group, user preference feedback, device type, operating system, software, rights claim information;
- **Data collected following consultation of the website**, such as browser settings, computer operating system, IP address of the computer accessing the site, cookie information, frequency and duration of visits, date and time of access, search terms, clicks on content. Usage data is not associated with personal data;
- **Data obtained from third parties:** we regularly obtain personal data about you from affiliated entities, professional partners and other independent third parties. We add these to our existing databases where necessary.

8 How is your data collected?

As part of our services and activities, we collect your personal data directly from you or indirectly from third parties when necessary.

9 For what purposes do we process your personal data?

We process your personal data as part of our academic, research, executive education and expertise missions for purposes that may include the following:

- Recruitment of candidates for study programs (including executive education);
- Manage student registration, files and academic progress;
- Promotion of training offers;
- Management of student support services (IT, library, financial aid, careers, psychological assistance, etc.);
- Management of hosting offers;
- Follow-up of the Alumni-ae community and organization of events;
- Recruitment of academic and administrative staff;
- Personnel management;
- Training management;
- Promotion of institutional activities and information;
- Event management;
- Promoting research and scientific activities;
- Academic activities;
- Video surveillance and security;
- Statistics production;
- Answers to questions, requests and communication;
- Compliance checks and compliance with legal provisions (e.g. when exercising your data protection rights or during audits).

10 With whom do we share your personal data?

The Institute undertakes to share your personal data only in certain circumstances and in compliance with the general principles mentioned above and the provisions of the applicable regulations.

In particular, the Institute may share your personal data:

- **Internally**, to enable us to carry out our missions;

- **With third-party service providers** who process personal data on behalf of the Institute and with whom the issue of personal data is addressed in contracts (e.g. hosting, storage, database management or IT maintenance services);
- **With academic partners** (ex officio or on request) such as the University of Geneva, as part of joint programs, services or academic partnerships (e.g., in the case of mobility);
- **With third-party institutions or entities** with which the Institute may collaborate on various issues (Alumni Association, GISA, ADA);
- **With administrative authorities** to meet legal obligations (e.g. cantonal tax authorities, cantonal population office);
- **With scholarship or financial aid organizations** if applicable (e.g. financial aid from the Swiss National Science Foundation (SNSF)).

When the Institute uses a subcontractor, it undertakes to comply with the subcontracting provisions applicable to the Institute.

11 International data transfers

In the course of processing personal data, the Institute may communicate personal data abroad.

This may be the case, in particular:

- Within the framework of collaboration with academic partners in connection with exchanges or internships ;
- In the event of transmission of personal data to subcontractors who, as service providers, process such data on behalf of the Institute.

For some personal data processing, we also use cloud services from foreign providers. We make every effort to store data in Switzerland, but in some cases this may not be possible. In such cases, we give preference to European Union countries whenever possible, and to countries offering a level of protection adequate to Swiss or, where applicable, European legislation.

The Institute currently transfers data to the following countries under its contracts:

- In Europe (France, Great Britain, Germany, Ireland, Finland, Netherlands)
- In the United States

When the country to which personal data is transferred does not provide a level of protection adequate to Swiss legislation (see list in Appendix 1 of the Federal Council's Data Protection Ordinance [https://www.fedlex.admin.ch/#annex_1] established by the Federal Council) or, where applicable, European legislation, the Institute ensures that additional guarantees are obtained, for example by imposing standard contractual clauses on the recipient of the personal data, or may rely on particular circumstances (explicit consent of the data subject, performance of a contract, safeguarding of an overriding public interest, etc.) when the conditions are met.

In the event of a transfer to the United States, standard contractual clauses must be signed by the Institute and the recipient of the personal data.

We also check whether the subcontractor is certified by the Swiss US Data Privacy Framework.

For more information on these guarantees, please contact: dpo@graduateinstitute.ch

12 How long do we keep your personal data?

In accordance with the principle of proportionality, we process and store your personal data for as long as necessary for the performance of our contractual or legal obligations, for as long as necessary for the purposes for which we have collected it, for as long as our legitimate interests persist or as long as the consent given has not been withdrawn.

At the end of these periods, your personal data is destroyed or made anonymous.

In certain circumstances, we may be obliged to keep your personal data for a longer period of time due to legal requirements (statute of limitations and legal retention periods) or for statistical purposes. In the latter case, the data is anonymized and you can no longer be identified.

13 How do we protect your personal data?

Data security is one of the Institute's priorities.

We take the reasonable technical, organizational and legal measures necessary to protect the security and confidentiality of your personal data, in particular with regard to the risks to which you are exposed as a result of the processing carried out and the sensitivity or otherwise of the data concerned.

These measures are designed to prevent unauthorized disclosure, use, alteration or destruction of data (integrity, confidentiality and availability).

We also take security measures to reduce risks on our websites and applications.

These measures are regularly reviewed and updated to ensure the best possible safety.

14 What are your rights regarding the processing of personal data?

- **The right of access and information**

You can ask the Institute whether personal data concerning you is processed by the Institute and, if so, which data. If your personal data is processed by the Institute, you can obtain, in particular, the following information about the processing:

- Identity and contact details of the data controller;
- Personal data processed as such;
- The purpose of the processing;
- How long personal data will be kept, or if this is not possible, the criteria for setting the retention period;
- Available information on the origin of personal data, insofar as this data has not been collected from the data subject;
- Where applicable, the existence of an automated individual decision and the logic on which the decision is based;
- Where applicable, the recipients or categories of recipients to whom personal data is disclosed, as well as information relating to the disclosure of personal data abroad.

The Institute will provide the requested information free of charge, unless providing the information would require disproportionate effort. In this case, the Institute may charge a maximum of CHF 300.

- **The right to rectify the data**

In accordance with the principle of accuracy, you may request the Institute to rectify inaccurate personal data at any time (for example, if your e-mail address has changed). The Institute will do so as soon as possible, unless a legal obligation prevents it from doing so.

- **The right to erasure (the right to be forgotten)**

In accordance with the principle of finality, you may request the deletion of data concerning you at any time, in particular when one of the following reasons applies:

- Your personal data has been collected or processed for purposes for which it is no longer required;
- You have withdrawn the consent on which the processing was based and there is no other legal basis for the processing;
- You object to processing of your data that is based on the legitimate interests of the Institute or a third party and your interest becomes overriding;
- You object to processing for marketing purposes;
- Your personal data has been processed unlawfully;
- The Institute is obliged to do so by law.

In this case, the Institute has a best-efforts obligation. It will do its utmost to guarantee the general deletion of data within the limits of available technologies and their implementation costs.

The right to erasure is not absolute. As long as personal data is required for one or more justified purposes and there is a legal basis, the Institute is not obliged to delete it.

- **The right to restriction of processing**

You may request that we restrict the processing of your data in the following cases in particular: you dispute the accuracy of the data collected, the data is no longer required for processing but you wish us to retain it for the exercise of a legal right, or you dispute processing and request that we restrict processing pending resolution of the dispute.

- **The right to data portability**

You have the right to obtain your personal data in a structured, commonly used and machine-readable format in order to transmit them to another data controller. This right applies when data processing (provided by the data subject) is carried out by automated means and you have consented to the processing or when the processing is carried out on the basis of a contract between you and the Institute.

- **The right to object to the processing**

You may object to the processing of data relating to you, provided that you give a legitimate reason for doing so. The Institute may object by demonstrating that there are compelling legitimate grounds for the processing which override your interests and rights. In some cases we process your personal data for prospecting purposes. You have the right to object to this type of processing at any time.

- **The right to withdraw consent**

You have the right to withdraw your consent to the processing of personal data at any time. Withdrawal of consent cannot be retroactive.

- **The right to contact a data protection supervisory authority**

You can contact the Swiss Federal Data Protection and Information Commissioner (FDPIC), where the processing falls under the FADP, or a supervisory authority in an EU country, where the processing falls under the GDPR, if you believe that a breach of the applicable legislation has occurred in the processing of your personal data.

In order to be able to exercise your rights and avoid any misuse, we will need to verify your identity and may ask you to provide us with additional personal information in order to identify you (for example, a copy of an identity document).

We will do our utmost to satisfy your request within the legal deadline of 30 days. However, the processing time may be extended for specific reasons relating to the grounds, the complexity of your request or the number of requests. If this is the case, we will inform you.

15 Cookie Usage

The use of our website involves the collection of cookies. For more information on this subject, please consult our *Cookie Policy*.

16 How to contact us

If you have any questions about the processing of your personal data by the Institute or if you wish to exercise your rights, you can contact us by sending an email to: yourdata@graduateinstitute.ch or by post to the attention of the IT Service Desk at the following address:

Geneva Graduate Institute
Chemin Eugène-Rigot 2A
P.O. Box 1672
CH- 1211 Geneva 1

Switzerland

17 Changes to this privacy policy

The Privacy Policy can be consulted on the Institute's website. We reserve the right to modify and supplement it at any time without prior notice and at our sole discretion, in particular to take account of regulatory developments. The updated version is published.

The date of the last update appears on this Policy. This Policy is available in English and French. In the event of any discrepancy between the two versions, the French version shall prevail.

Date of last update: 05.02.2025