

Privacy Notice – Conflict Armament Research



This Privacy Notice sets out how Conflict Armament Research (“CAR,” “we,” “our,” “us,”) collects, uses, and shares your personal information. It covers personal information that you provide to us via our website, <https://www.conflictarm.com/> (our “Site”), that we process in connection with our activities which are aimed at informing and supporting effective weapons management and control. CAR is a private limited company incorporated under the laws England & Wales, with registered office at 10 Queen Street Place, London, England, EC4R 1AG. This Privacy Notice applies to the use of personal information provided to or otherwise processed by CAR.

In this privacy notice references to the GDPR are to the General Data Protection Regulation (EU) 2016/679 as implemented into UK law.

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1. Personal information we process

Personal information is any information that relates to an individual. In the course of carrying out our activities, we may collect your:

- Name;
- Email address;
- Contact number;
- [Affiliation to organisations or bodies; and
- Job title and sector in which you work/ are involved.

We also collect and store information about your device and your visits to the Site such as your IP address, geographical location, browser type, referral source, length of visit, and number of page views. An IP address is a number that is automatically assigned to your computer when you use the Internet. We use IP addresses to help diagnose problems with our server, administer our Site, analyse trends,

and gather broad demographic information for aggregate use in order for us to improve the site, and deliver customized, personalized content. See more in the “Cookies” section below.

If you contact us, we may keep a record of that correspondence, including your contact details, name, interests, and related job information. This includes any email correspondence with CAR, complaints about any of our activities and job applications on <https://www.conflictarm.com/vacancies/>. If you apply for an open position through our recruitment pages on the Site, we usually (depending on the location) require you to provide your name, email address, phone number, as well as a CV and cover letter to our recruitment mailbox.

2. Sensitive personal information

We will only collect and use sensitive personal information (also known as special category data under the UK GDPR) if there is a valid reason for doing so and where the law allows us to. Sensitive personal information includes personal information about health, ethnicity, religion, political opinions or sexuality. For instance, information that you provide to us about your health is sensitive personal information.

We request that you avoid disclosing to us any sensitive personal information relating to you or anyone else when providing us with personal information, except where that information has been requested.

If you provide us with any ‘sensitive personal information’ to the extent permitted by law, we will treat that information with extra care in accordance with the requirements of the GDPR.

3. Why we process your personal information

We may process your personal information for various purposes, including:

- to make first contact with you regarding a weapon we have traced to your organisation;
- to contact you regarding your enquiries or respond to communications from you;
- to send you our newsletters, topic updates, and event invites, at your request, when you sign up to our mailing list;
- for business purposes, such as analytics, research, advertising and marketing, and operational purposes;
- to maintain, operate, customise, and improve our services;
- to consider your application for employment or to work for us on a contractual basis and to correspond with you in relation to any such application;
- to comply with a specific legal requirement, for law enforcement purposes and/ or to maintain our security; or
- for such other purposes as we describe to you at the time of collection or use of your personal information.

We do not use automated decision-making or engage in profiling of your personal information. If a situation arises where we intend to use your personal information for any reason beyond its original purpose, we will notify you and provide additional information as soon as possible.

4. **Lawful bases**

We will only use personal information when the law allows us to (i.e. where we have a 'lawful basis'). Most commonly, we will use your personal information in reliance on the following lawful bases:

- Where it is necessary for our **legitimate interests** (or those of a third party) and your interests and fundamental rights do not override those interests. For example, we have a legitimate interest in contacting you to make enquiries in the course of our activities, provided that such contact does not interfere with your interests and fundamental rights.
- Where it is necessary for the **performance of a contract** with you.
- Where it is necessary to comply with a **legal obligation** on us (for example, reporting to the UK's Companies House).
- Less commonly, we may ask for your **consent** to use your personal information for a specific purpose or where such consent is required to send you direct marketing messages by email or other electronic means.

You may unsubscribe from our email communications via the link in any CAR email, request to withdraw your consent, and request for us to remove your personal information at any time by emailing us at admin@conflictarm.com.

5. **How we share your personal information**

We may share your personal information with third parties, including the following:

- contractors, suppliers, or other third parties that provide services on our behalf;
- our professional advisors;
- the European Union as part of the iTrace project ([see here](#) for further details);

other organisations involved at an earlier or later stage of the manufacture/ distribution of materials/ items which we have identified as being linked to your organisation;

We may also share your personal information:

- pursuant to a court order, or other legal process or as otherwise required or requested by law, regulation, or government authority programs, or to protect our rights or the rights or safety of third parties; or
- with your consent or as otherwise disclosed at the time of data collection or sharing.

We will not pass on your sensitive personal information to anyone else without your express permission except where required to by law, in order to protect our or a third party's interests, or where we use service providers to assist us e.g. IT support services.

6. **International data transfers**

Please be aware that the personal information we collect may be transferred to and maintained on servers or databases located outside your country or other jurisdiction where the privacy laws may not be as protective as those in your location. This may include any country where CAR operates, such as

Iraq, Libya, Somalia, South Sudan and Syria. Where required, we rely on EU and UK approved Standard Contractual Clauses where necessary to provide an adequate level of data protection.

7. How long your personal information is stored for

The criteria used to determine the period of storage of personal information is: (i) the respective statutory retention period; (ii) our contractual and/or business relationships with you; (iii) (potential) disputes; and (iv) any guidelines issued by relevant supervisory authorities. After expiration of that period, the corresponding information is routinely deleted, as long as it is no longer necessary for the fulfillment of a contract, the initiation of a contract or to protect or defend our position or that of a third party. If you have any questions about retention periods, please contact us at admin@conflictarm.com.

If you apply for a job with CAR we will keep your application materials on file, including any voluntary demographic data you may include with your submission, for up to one year.

8. Use of “Cookies”

Our Site uses cookies to enhance your experience while using our site. Cookies are pieces of information that some websites transfer to the computer that is browsing that website and are used for record-keeping purposes at many websites. Use of cookies makes web surfing easier by performing certain functions such as saving your passwords, your personal preferences regarding your use of the particular website and to make sure you don't see the same ads repeatedly. CAR uses Google Analytics to improve the performance of the Site and for analytics and marketing purposes. For more information about how Google Analytics collects and uses data when you use our Site, visit <https://www.google.com/policies/privacy/partners/>, and to opt out of Google Analytics, visit <https://tools.google.com/dlpage/gaoptout/>.

Your browser may be set by default to accept cookies. However, if you would prefer not to receive cookies, you can alter the configuration of your browser to refuse cookies. If you choose to have your browser refuse cookies, it is possible that some areas of our Site will not function properly when you view them.

Please note that withdrawal of consent for functionality cookies may mean that our Site becomes less friendly/easy to use, and may ask you to note/update your consent preferences on each visit.

Most browsers also allow you to change settings which control how you receive cookies across all websites you visit. You can find out more about cookies and how to manage them at: <https://allaboutcookies.org/>

9. Your rights

Under certain privacy laws, you have rights relating to your personal information. You may have a right to the following:

- ask us for confirmation of what personal data we hold about you, and to request a copy of that information.
- withdraw your consent at any time if we have relied on consent as the lawful ground to use your personal data.
- request that we delete the personal data we hold about you, as far as we are legally required to do so.

- ask that we correct any personal data that we hold about you which you believe to be inaccurate.
- object to the processing of your personal data where we: (i) process on the basis of the legitimate interests ground or for the performance of a task in the public interest; (ii) use the personal data for direct marketing; or (iii) use the personal data for statistical purposes.
- ask for the provision of your personal data in a machine-readable format to either yourself or a third party, in certain circumstances.
- ask for processing of your personal data to be restricted if there is disagreement about its accuracy or legitimate use.

To exercise these rights, contact us via the “Contact Us” section below. Please be aware that in some circumstances CAR may be unable to comply with requests made pursuant to these rights, such as if we are legally prevented from doing so or are able to rely on exemptions.

Additionally, you have the right to lodge a complaint against us. To do so, contact the supervisory authority in your country of residence. In the UK, this is the Information Commissioner’s Office at www.ico.org.uk/concerns.

10. **Other websites**

Our Site contains links to other websites. Please note that when you click on one of these links, you are entering another website for which CAR has no responsibility. We encourage you to read the privacy notice on all such sites as their notices may be different to ours.

The Site may also include integrated social media tools or “plug-ins,” such as social networking tools offered by third parties. If you use these tools to share information or you otherwise interact with social media features on the Site, those social media companies may collect information about you and may use and share such information in accordance with your account settings, including by sharing such information with the general public. Your interactions with third-party social media companies and the use of their features are governed by the privacy policies of the companies that provide those features. We encourage you to read the privacy policies for any social media accounts you create and use.

11. **Updates to this Notice**

We may change this Privacy Notice at any time at our discretion. If we decide to make significant changes to our Privacy Notice, we will contact you where reasonably possible. We will also post these changes on this page.

12. **Contact us**

If you have any questions about this Privacy Notice, the Site, or our activities, you can contact us by phone at +44 (0) 203 355 6575 or email us at admin@conflictarm.com.

Last updated: 17 November 2022