

NOTICE ON PERSONAL DATA PROCESSING BY LUETHI-PETERSON CAMPS INTERNATIONAL

This information is prepared by Luethi-Peterson Camps International, Ecole d'Humanité, 6085 Hasliberg-Goldern, Switzerland.

About this notice

This information is prepared by Luethi-Peterson Camps International, Ecole d'Humanité, 6085 Hasliberg-Goldern, Switzerland. Data protection regulation (GDPR) became enforceable in May 25, 2018 requiring Luethi-Peterson Camps ("LPC" or "We" or "Us" or "Our") to provide you with additional information about your rights and the processing of your Personal Data.

If you have any questions relating to the way LPC is handling your Personal Data, please contact Our European Central Office as lpc.office@ecole.ch.

From where and what Personal Data do We collect, process and hold?

Most of the Personal Data We are collecting is provided by parents, counsellors and directors during the recruitment process where We are organizing the camps and inviting participants including the following categories:

<i>Identity:</i>	last name, first name, middle name, visa number (where applicable), age, date of birth, gender,
<i>Personal Details:</i>	nationality, language spoken and similar type of data
<i>Contact details:</i>	permanent address, telephone number, email address, emergency contact name, emergency contact telephone number, emergency contact address, and similar types of data
<i>Information on hobbies:</i>	information on skills, instruments played, special hobbies, things counsellors or campers may teach others in camp
<i>Sensitive data</i>	photographs, health information, religious belief, special needs, difficult family situations

What do We do with your Personal Data?

We will only process your Personal Data in accordance with applicable data protection laws and based on the following grounds:

1. Processing of Personal Data is based on Our contractual obligations with you as a party to the contract (processing is necessary already prior to entering the contract even if the contract is not executed).
2. Processing is based on Our legitimate interests as non-profit organization.
3. Processing is based on necessity to protect the vital interests of participants of the camps in case of any health or medical treatment.

We process Personal Data for the following purposes:

- Inviting campers and counsellors and forming balance group in terms of age, nationality, language spoken, special skills;
- Planning activities
- Organizing and running LPC camp in accordance with mandatory legal regulations,
- Solve any health problems that might happen in camp
- Evaluation of camps, preparing evaluation letters and reports

We will not use your personal information for purposes that are incompatible with the purposes for which we originally received your information without notifying you and explaining the legal basis which allows us to do so.

Disclosing Personal Data

We may disclose Personal Data information to: (a) our staff including directors, counsellors, LPC Central Office employees and contractors and to LPC Support Groups; (b) public authorities if it is required by law for public order reasons, (c) to doctors or nurses to secure proper medical treatment/assistance during the camp; (d) and respond to a legal process or a request from a public authority.

We will not sell or lease your information to third parties without your consent.

International Transfer of Personal Data

Personal Data may be collected, processed, stored or disclosed or transferred by “Us” to LPC Inc. – an affiliated entity operating in the United States for the purpose of organizing LPC camps in US.

Data protection laws vary among countries, with some providing more protection than others. Regardless of where your Personal Data is processed, we apply the protections described in this Notice. We may also use certain legal frameworks relating to international data transfer, such as the EU-US and Swiss-US Privacy Shield Frameworks. Your Personal Data is transferred and treated in accordance with this Notice and the IGT global data transfer agreement wherever and whenever we process it.

Retention and Security

We have security measures in place to protect against unauthorized access, use, and disclosure of your Personal Data. As an example of such measures, we restrict access to Personal Data on a need to know basis.

To protect the confidentiality, integrity, and availability of your Personal Data in our custody, we maintain physical, logical, and procedural safeguards in compliance with security best practices. As part of these best practices, we review our privacy policies on a regular basis to ensure our compliance with applicable data protection laws and regulations.

Your Personal Data is retained for 10 years after they were obtained or until you ask us to erase your Personal Data. After lapse of the above period, or if you ask us to delete your Personal Data, your Personal Data will only be retained as is required by applicable law.

Please be aware, however, that no information system is 100% secure, and therefore we cannot guarantee against all potential security breaches. Moreover, the transmission of information over wireless and wired networks is not inherently secure, and we are not responsible for the transmission of information over networks that we do not control.

Access, correction and other rights

You have the right to request:

- **Access to your Personal Data:** You may contact us to provide you with details on the data that has been collected about you and how such data is being processed by us.
- **Receive your Personal Data:** You may contact us to provide you with a copy of your Personal Data that we have.
- **Object to, or Restrict, use of your Personal Data:** If at any point you believe that your Personal Data is being processed unlawfully, you may contact us to stop or cease any such processing including for profiling, automated-decision making, and marketing.
- **Change or Correct your Personal Data:** By accessing your profile or account, you have the right to change or correct your Personal Data if it is inaccurate or incomplete. You may also contact us to update or correct your data.
- **Erase your Personal Data:** You may contact us to erase or delete all or some of your Personal Data.

If you fail to provide certain information when requested, we may not be able to perform the contract we have entered into with you) or we may be prevented from complying with our legal obligations.

If we receive from you a formal written complaint regarding your personal data, we respond by contacting you. We will work with the appropriate regulatory authorities, including local data protection authorities, to resolve any complaints regarding the transfer of your data that we cannot resolve with you directly.

In addition, in some jurisdictions, you can complain to the applicable Data Protection Authority if you are unsatisfied with our response to your concerns.