

# Digital Dignity Association

## Privacy Policy

This Privacy Policy explains how DIGITAL DIGNITY ASSOCIATION (“We”) collects, use and protects your personal data when you visit our website or use our digital tools and solutions, or otherwise interact with us (the “Digital Tools”).

### 1. Controller

We are a non-profit association based in Geneva, Switzerland.

For the purposes described in this Privacy Policy, we act as the controller of your personal data within the meaning of the Swiss Federal Act on Data Protection (revFADP) and the EU General Data Protection Regulation (GDPR), where applicable.

This means that we determine the purposes and means of the processing of your personal data when you visit our website, become a Supporter or access and use our Digital Tools, or otherwise interact with us.

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### 2. What personal data we process

Depending on how you interact with us, we may process the following personal data :

#### Website

When you visit our website, some technical information may be collected automatically, such as:

- IP address
- Browser type
- Pages visited
- Date and time of visit

#### Newsletter

If you subscribe to our newsletter, we will process your name and email address.

## Contact form

If you reach out to us for information or support, we will process your email address, the content of your message and any personal data provided by you.

## Donations

Donations may be made through external platforms such as GoFundMe, Happypot, STRIPE or similar. These platforms process your personal and payment information according to their own privacy policies. We only receive limited information necessary to manage and acknowledge donations.

## Supporter's account information

Visitors to our website may choose to become a "Supporter" of DIGITAL DIGNITY.

When you register as a Supporter on our website, we collect personal information such as:

- Name
- Email address
- Country of residence
- Contact details
- Login credentials
- Any other information you provide in the registration form

Your payment information is processed directly by our payment service provider STRIPE and we do not have access to it. We only receive confirmation that the payment was completed.

## Use of the digital tool "Digital Dignity"

When you use *Digital Dignity*, we process the following personal data:

- Your account information: login credentials, Supporter's status
- Your technological information: IP address, browser type and version
- Your contact information: your name, email address
- Your location: your country of residence
- Your image: photographs or images of your face where you are identifiable.

Biometric personal data: When our face-matching tool *Digital Dignity* analyzes the images you upload, we extract certain facial features through automated processing to compare them with data derived from publicly accessible online content. This

processing generates biometric data within the meaning of applicable data protection laws.

We process this data only for the purpose of providing the face-matching functionality of the tool.

You must only upload images of yourself.

- Technical data: your IP address, device and browser information, timestamps of access, system logs related to the use of our Digital Tool.

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### 3. Cookies and Similar Technologies

Our website uses cookies and comparable technologies only to the extent necessary to provide our services securely and reliably. We do not use advertising or cross-site tracking cookies.

Cookies are small text files stored on your device. Similar technologies (such as your browser's local and session storage) can store information in the same way.

The cookies we use are strictly necessary for the website to function: they keep you signed in and protect our forms against abuse. Because these cookies are essential, the website cannot function without them. You can delete them at any time through your browser settings, and you can block cookies there as well, but doing so will prevent you from signing in and using the service.

## Cookies we use

Cookie / technology	Provider	Purpose	Category	Type	Storage duration
better-auth.session_token	Digital Dignity (first-party)	Keeps you signed in (authentication session)	Strictly necessary	HTTP cookie	7 days
better-auth.session_data	Digital Dignity (first-party)	Temporarily caches session data to speed up requests	Strictly necessary	HTTP cookie	~5 minutes
cf_clearance / __cf_bm	Cloudflare Turnstile (third-party)	Protects our sign-in, sign-up and newsletter forms against bots and spam	Strictly necessary (security)	HTTP cookie	Session / short-lived
__stripe_mid / __stripe_sid	Stripe (third-party)	Fraud prevention during payment. These are set by Stripe on its own checkout page when you make a payment, not on our website.	Strictly necessary (payment)	HTTP cookie	Up to 1 year / 30 minutes

Session storage entries	Digital Dignity (first-party)	Temporarily remembers information you entered during sign-up (e.g. your email). Cleared automatically when you close the browser tab.	Strictly necessary	Browser session storage	Until tab is closed
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### Analytics without cookies

We use PostHog to understand, in aggregate, how our website is used, so we can improve it. We run PostHog in cookieless mode: it sets no cookies, stores nothing on your device, does not record your session, and respects your browser's "Do Not Track" setting. Visitor identifiers are derived from a daily, server-side hash and are not linked to you across days. For this reason, our analytics do not require your consent and no cookie banner is shown.

We also use Sentry to detect and diagnose technical errors. Sentry does not set any cookies.

We do not use Google Analytics, advertising pixels, or any other third-party tracking scripts.

### Third-party providers

Some of the technologies above involve service providers who process data on our behalf or under their own responsibility:

- Cloudflare (Turnstile bot protection)
- Stripe (Payment and subscription processing)
- PostHog (Cookieless product analytics, EU-hosted)
- Sentry (Error and performance monitoring)

Details on these providers, the data involved, and the applicable legal bases are set out in the "Third-party services / Data processors" section of this Privacy Policy.

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## 4. Why we process your personal data

We process your personal data for the following purposes:

- Improve our website and communication
  - Respond to your messages or requests
  - Provide information about our mission and activities
  - Process your donations or payments
  - Where applicable, managing your DIGITAL DIGNITY account
  - Where applicable, providing you access to the Digital Tool
  - When you use our Digital Tool and have accepted the processing, to perform facial comparison searches and present possible results to you.
  - Maintain the security of our systems
  - Prevent misuse of the Digital Tool
  - Where necessary, to comply with legal obligations and/or cooperate with competent authorities
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## 5. How long we keep your data

We keep your personal data only for as long as necessary for the purposes described in this Privacy Policy.

In particular:

- When you visit our website, we collect analytics data on a privacy-friendly, cookieless basis (via PostHog). We do not set tracking cookies or store your IP address, and this data cannot be used to identify you personally.
  - Supporter's account information are kept for the duration of your relationship with us and for any legally required retention period
  - Your Digital Dignity account information are kept for as long as your account stays active
  - Images and biometric data you upload are stored only for the time necessary to perform the facial comparison and provide results;
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## 6. Legal basis for processing

We rely on the following legal bases to process your personal data:

- Your consent: We rely on your explicit consent to process the facial images you submit when using the Digital Tool. You may withdraw your consent at any time by writing to us.
  - Performance of a contract: By becoming a Supporter, we grant you access to the Digital Tool. If you wish to use the Digital Tool and create an account, we process your data in order to provide you with those services.
  - Legitimate interests: We may process certain technical and operational data where necessary to ensure the security, stability, and improvement of our services.
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## 7. Who we share your personal data with

We do not sell your personal data.

We may disclose or share your personal data with the following categories of recipients, where necessary for the purposes described in this Privacy Policy:

- Technical service providers who support the operation, maintenance, hosting, and security of our infrastructure and services (e.g., IT hosting, cloud services, support tools).
- Competent authorities and other third parties where disclosure is required by applicable law, regulation, or binding governmental request, or where necessary in connection with legal proceedings or legal claims.
- Authorised volunteers and support personnel, strictly on a need-to-know basis, for the purpose of providing technical assistance, troubleshooting, or responding to user requests and tickets

Where we engage external service providers to process personal data on our behalf, they are contractually bound by data protection agreements in accordance with applicable Swiss data protection law.

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## 8. International data transfer

Some of our service providers are located outside of Switzerland and therefore process your personal data in the following countries :

- Finland (EU)
- Sweden (EU)
- The United States of America

Where personal data is transferred to countries outside Switzerland, such transfers are carried out in accordance with Article 16 of the Swiss Federal Act on Data Protection (revFADP).

For transfers to countries within the European Union, an adequate level of data protection is generally recognized by the Swiss Federal Council, meaning that such transfers may take place without additional safeguards on that basis.

For transfers to the United States, protection is ensured either on the basis of an adequacy decision (in particular where the recipient is certified under the Swiss–U.S. Data Privacy Framework) or, where such certification is not available, through appropriate safeguards such as the Standard Contractual Clauses, supplemented where necessary by additional technical and organisational measures.

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## 9. How we protect your data

Data security is of the utmost importance to us. We continuously evaluate and improve our security systems, organizational measures, and our practices to reduce our vulnerability to threats. By implementing rigorous security controls, we ensure that personal data is accessible to the Association at all times, while continuously protecting it from malicious actors.

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## 10. Your rights

Depending on your location and applicable law, you may have the right to:

- Request access to your personal data
- Ask us to correct incorrect information
- Request deletion of your data
- Withdraw consent for data processing
- Object to the use of your data

To exercise your rights, you can contact us at: [hello@digitaldignity.io](mailto:hello@digitaldignity.io)