

DATA PRIVACY & COOKIES STATEMENT

1. General

- This Data Privacy & Cookies Statement (“Statement”) applies to LactaHub’s website at www.lactahub.org. LactaHub is a partnership project of [The Global Health Network \(University of Oxford\)](#) and the [Family Larsson-Rosenquist Foundation \(“FLRF”\)](#). The FLRF is a charitable foundation governed by Swiss law and based at Rheinstrasse 1 in 8500 Frauenfeld, Switzerland.
- The FLRF respects and values the privacy of everyone who visits LactaHub’s website. Your personal data will be treated confidentially and will not be used commercially but only on the basis of this Statement.
- Other webpages that are linked directly or indirectly to LactaHub’s website (e.g. through hyperlinks) do not fall within the scope of this Statement. The Statement applies to the recording, processing and use of your personal data when you visit LactaHub’s website and/or have any interaction with it and explains our practice in relation to the placement of cookies, including the types of cookies we use and how you can manage them.
- The FLRF is the data controller of LactaHub’s website. The person responsible for data processing can be contacted via email at contact@lactahub.org.
- The terms “FLRF”, “our” and “we” herein are defined and understood to be the Family Larsson-Rosenquist Foundation located at Rheinstrasse 1 in 8500 Frauenfeld, Switzerland.
- The term “LactaHub’s website” herein is defined and understood to be the website of LactaHub at www.lactahub.org.
- The term “you” and “your” herein is defined and understood to be the person that visits LactaHub’s website and has read, understood, accepted and agreed to this Statement.

2. Anonymous Use of LactaHub’s Website

- In principle, LactaHub’s website can be used without disclosing any personal data. Upon your first visit to LactaHub’s website, we ask you to either accept or reject the placement of cookies on your device and the tracing of your user behaviour in order to better understand how visitors use LactaHub’s website and to improve the information available on it.
- If you wish to remain completely anonymous you may select “Reject All Cookies” in the cookie banner or withdraw your consent at a later stage using the deactivation mechanisms further described in Section 5 to indicate that you are revoking your consent to the placement of cookies for the future. In that case, we only collect certain anonymous data which is not directly connected to your person and prevents you from being identified, such as recording the number of visitors to LactaHub’s website, browsing patterns and interest areas, where relevant. This information may be analysed for statistical purposes and for internal use in order to be able to understand how visitors use LactaHub’s website and to observe trends, statistics and the needs of our users for improvement of LactaHub’s website. Your personal data will not be used for other purposes or processed beyond the scope of this Statement unless this is expressly permitted or prescribed by law.
- Without your express consent and unless indicated otherwise, we shall use the personal data shared by you solely to the extent this is required for you to use LactaHub’s website, including the processing of your enquiries and the performance of the requested services, and we only collect your personal data if you share this with us voluntarily, e.g. by requesting a specific service or signing up for LactaHub’s newsletter. Upon registering for LactaHub’s newsletter (see Section 4 below), we may use such user information to arrange for you to be sent personalised messages. The following Sections 4 to 9 contain a detailed description of the cookies and website analysis tools that we utilise for this purpose, along with your rights to refuse consent.

3. Contacting us

- Submitting an enquiry through LactaHub’s website is voluntary. However, if you choose to submit such enquiry, we gather and process personal data (such as your first name, surname, email address and other data that you voluntarily share with us) carefully and exclusively for the purposes described in this Statement and only to the extent necessary for the purpose of providing services in relation to your enquiry (e.g. in order to have the requested information sent to you) and within the framework of applicable legal provisions.

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- We store your personal data exclusively to the extent and for the duration necessary to provide such services in relation to your enquiry, or as required by law. Your data is treated confidential and, in close cooperation with our hosting providers, we make every effort to ensure that databases are protected from unauthorized access, alteration, loss, misuse and falsification.

4. Newsletter Registration and Receipt

- Registering for LactaNews, LactaHub's newsletter, is voluntary. However, if you choose to register for such newsletter, we request your consent to the storage and processing of the following information: First name, surname and email address. Such data is solely used to ensure you are provided with regular updates via email about LactaHub. As part of your registration, your consent is requested to the personalisation of the content of LactaHub's newsletter to reflect your requirements and interests based on the stored data received from and about you.
- Following your registration for LactaHub's newsletter you will receive an email confirmation with a link you need to click on to confirm your registration. This double activation process helps us ensure that the owner of the email account agrees to receive said newsletter.
- By registering for LactaHub's newsletter you further consent to the FLRF recording your use of such newsletters, such as openings and clicks, using an analysis tool of CleverReach GmbH & Co. KG., Schafjückenweg 2 in 26180 Rastede, Germany. This tool also records data on the forwarding of emails, undeliverable emails and logouts. The data recorded includes name, email address and location.
- Furthermore, we use other technical service providers in Switzerland or the EU who offer similar tools that help us manage the newsletter subscription and associated communications and marketing services. Such service providers process this data solely on our behalf and according to our instructions and to facilitate the analysis of the use of LactaHub's newsletter, personalise your newsletter-communications, compile reports about newsletter activities and for other statistical and analytical purposes related to the use of LactaHub's newsletter. Your data will not be used for other purposes.
- Based on personal contacts with employees of the FLRF or through your registration for LactaHub's newsletter, your personal data is stored in our address database which is hosted on servers in Switzerland and in Germany.
- The processing of your personal data helps us inform you about LactaHub's work in the form of a newsletter. The data is not used commercially. This also encompasses the required legitimate interest in the processing of the data under Article 6(1)(f) GDPR.
- We process the following categories of personal data from you: First name, surname and email address.
- Access to the data is restricted to those employees of the FLRF who require this to achieve the aforementioned purpose.
- We store your personal data only for as long as is necessary and permissible to achieve the purpose specified in this Statement.
- You may unsubscribe from LactaHub's newsletter at any time and revoke your consent with future effect by clicking on "unsubscribe" at the bottom of the newsletter email received, responding to the newsletter with "UNSUBSCRIBE" in the subject heading or via email or mail to the contacts given in Section 15 of this Statement.

5. Use of Cookies

- LactaHub's website uses cookies and other similar techniques which can identify your browser or your device. When you visit LactaHub's website for the first time, a cookie banner will be displayed, requesting either your agreement or disagreement to the placement of such cookies on your device. You will need to either "Accept All Cookies" or "Reject All Cookies". Such cookie banner informs you of the main purposes of cookies, about your options and where you can obtain further information.
- A cookie is a small text file with a short data sequences which is sent to your computer or stored automatically on your computer or mobile device by your web browser when you visit LactaHub's website. LactaHub's website uses cookies in order to better understand how a visitor uses such website and can improve the information available on it. You can view in your web browser's log at any time which cookies are being run. You are entitled at any time to explicitly withdraw your consent to the insertion of cookies and recording of your data with future effect.

- In order to improve our services, other tracking technologies such as tracking pixels and web beacons may be used. These technologies are generally deployed jointly with cookies.
- Most browsers are set up to accept cookies as standard practice. You can change your settings so that cookies are categorically rejected, cookies already stored on your device are erased or you receive an alert before cookies are stored. Please consult the guidance for your browser or see www.aboutcookies.org or www.allaboutcookies.org about how to adjust or change your browser settings.
- When using different devices such as smartphones, tablets, computers to access LactaHub's website you must ensure that each browser is adjusted on each device in line with your cookie preferences.
- Not permitting any cookies may affect the usability of LactaHub's website and some features and services may not be available to you.

6. Use of Google Analytics

- The FLRF uses web analytics services on LactaHub's website such as Google Analytics which is a web-analysis service of Google Ireland Limited. Google Analytics allows us to measure and evaluate the use of LactaHub's website. Therefore, permanent cookies are used. Normally, Google Ireland Limited sends all data generated by such cookies about your use of LactaHub's website to servers in Ireland and the USA and stores it there. However, the IP address sent from your browser in connection with Google Analytics is not linked to any other data managed by Google Ireland Limited.
- You can prevent the data generated by the cookies from your use of LactaHub's website, including your IP address, from being recorded and can deactivate tracing by Google Analytics across all webpages by downloading a browser plugin here [Add link: <https://tools.google.com/dlpage/gaoptout?hl=en>] and installing it. In such case an opt-out cookie is stored in your browser which prevents your use of LactaHub's website being tracked by Google Analytics. You will need to repeat the deactivation process if you delete all cookies stored on your device. Furthermore, you will need to carry out the deactivation process on each device you use to view LactaHub's website.
- An overview of Google, Inc.'s data privacy provisions is available [here](#).

7. Twitter Social Plugins

- LactaHub's website uses social plugins of the short message network service Twitter, operated by Twitter Inc., 1355 Market Street, Suite 900, San Francisco, CA 94103, USA. The Twitter plugins are recognisable by the Twitter logo (blue bird on a white background or vice versa) or the suffix "tweet" or "tweets" on LactaHub's website.
- When activating social plugins and visiting a webpage of LactaHub's website that contains such a plugin, a direct connection is established between your browser and the Twitter server. Through this connection, Twitter receives the information that you have visited LactaHub's website with your IP address. If you click on the Twitter "tweet button" while logged into your Twitter account, you may link the content of LactaHub's website to your Twitter profile. As a result, Twitter can attribute the visit to LactaHub's website to your Twitter user account. Please note that as the provider of LactaHub's website, we are not aware of the content of the transferred data or its use by Twitter. Further information about Twitter's data privacy declaration can be found [here](#).
- If you do not want Twitter to be able to identify your visit to LactaHub's website, please log out of your Twitter user account or use special add-ons for your browser that prevent social plugins from loading.

8. YouTube Plugins

- For embedded videos, LactaHub's website contains YouTube plugins. YouTube LLC, 901 Cherry Avenue, San Bruno, CA 94066, USA is owned by Google LLC, 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA. When you visit one of our webpages that contains a YouTube plugin and watch a video, a connection to YouTube's and/or Google's servers is established, and cookies are installed on your computer. Your IP address might be sent to YouTube with the information that you have watched the video. Please note that as the provider of LactaHub's website, we are not aware of the content of the transferred data or its use by YouTube. Further information about YouTube's data privacy policy can be found [here](#).
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- If you are logged into your YouTube account when visiting LactaHub's website, YouTube can attribute the visit to LactaHub's website to your YouTube account. To prevent YouTube from gaining access to your information about websites, please log off from your YouTube account or exclude YouTube plugins with an add-on for your browser.

9. Wistia Plugins

- LactaHub's website uses Wistia to power some of its videos. Wistia is operated by Wistia, Inc., 120 Brookline Street, Cambridge, MA 02139, USA, and tracks how you interact with the videos on LactaHub's website (e.g. which video do you play, how often, at what points you pause or rewind).
- Some videos powered by Wistia are intended as learning material and an educational tool for health professionals in the neonatal intensive care unit (NICU) only and are not intended for users without a medical education. Therefore, Wistia may request that you provide your email address. You are under no obligation to provide such information; however, certain videos might be limited to identified users.
- Pursuant to Wistia's information about data protection, it aggregates the data collected through the videos on LactaHub's website (including email addresses) and provides such data to the FLRF. Other than providing such data to the FLRF, Wistia does not sell or provide the data it collects from LactaHub's website to third parties. The FLRF might use such data to analyse user behaviour in order to better understand how visitors use LactaHub's website and to improve the information available on it. Further information about Wistia's privacy policy can be found [here](#).

10. Hosting Provider and Server Log Files

- The provider of LactaHub's website, The Global Health Network (TGHN), NDM Research Building, Nuffield Department of Medicine, University of Oxford, Old Road Campus, Roosevelt Drive, Headington in Oxford OX3 7FZ, United Kingdom, collects and automatically stores information (such as IP address, browser type and browser version, operating system used, referrer URL, host name of the accessing computer and time of the server request) automatically sent by your browser in server log files. Such data cannot be directly attributed to specific people and is not combined with other data sources. We reserve the right to review the aforementioned data subsequently if we become aware of specific indications of any unlawful use.

11. SSL Encryption

- LactaHub's website uses SSL encryption for security reasons and to protect transfers of confidential content such as your subscription to LactaHub's newsletter. An encrypted connection can be recognized by noticing a change in the browser address line from "http://" to "https://" and by the padlock symbol in the browser line. If SSL encryption is activated, data that you send via LactaHub's website cannot be read by third parties.

12. Sharing of your Personal Data

- In some circumstances we work together with external technical service providers who are authorised to carry out services on our behalf and in accordance with our instructions. These companies may be given access to your personal data but solely to the extent this is required for your use of LactaHub's website, including the performance of services such as the processing of you signing up for LactaHub's newsletter. Thus, we may engage service providers to host LactaHub's website, store your data or analyse the data recorded. These service providers are not permitted to share your personal data with unauthorised third parties or use it for purposes other than as directed. Some of these service providers may be based in countries outside of Switzerland and the EU/EEA which do not guarantee the same level of data privacy as in your home country. However, we have entered into corresponding agreements with these service providers in order to ensure that all necessary measures are taken for the protection of your personal data, in line with the applicable requirements. For further questions relating to our service providers please contact us as explained in Section 12 below.
- Unless indicated otherwise as above, your personal data is neither transferred nor sold or otherwise transmitted to third parties in any form without your prior consent, unless we are legally obliged to do so.

13. Storage of your Personal Data and Data Security

- Your data is stored on servers in Switzerland and/or the EU and UK. Furthermore, providers of cloud services based outside of Switzerland, the EU/EEA and the UK, including in the USA, may be engaged to provide hosting services and process your data for storage, communications and marketing purposes.

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Given that the laws in the aforementioned countries may in certain circumstances not envisage the same level of data protection as is regarded as reasonable in Switzerland, the EU/EEA or the UK, we have taken the necessary steps to ensure your personal data is properly handled and protected and to make sure that this is processed solely on our account and in line with our instructions.

- Your personal data is treated confidentiality and we have implemented appropriate technical and organisational security measures in order to protect your personal data against any unauthorised sharing, unauthorised access, alteration, misuse and against accidental or unlawful destruction or loss.

14. General Data Protection Regulation (GDPR)

- In accordance with Article 27 DSGVO (Article 27 GDPR), in the European Economic Area (“EEA”) including the European Union (“EU”) and the Principality of Liechtenstein, Iceland and Norway, as an additional point of contact for supervisory authorities and data subjects for enquiries in connection with the GDPR, we have the following data protection representation: VGS Datenschutzpartner UG, Am Kaiserkai 69, 20457 Hamburg, Germany. Its email address is info@datenschutzpartner.eu.

15. Your Rights and Contact

- According to the provisions of the current data protection legislation, you are entitled to request information on the collection and processing of your data and can seek its amendment, blocking or deletion. Furthermore, you may be entitled to restrict or refuse the further processing of your data on legitimate grounds or based on the right to data portability. At any time, you can revoke all consents given with future effect.
- In case of any concerns related to your personal data or if you have any questions about the recording or processing of your personal data, about LactaHub’s website or this Statement, please contact the Family Larsson-Rosenquist Foundation at Rheinstrasse 1, 8500 Frauenfeld, Switzerland, via telephone +41 41 510 05 10 or via email info@larsson-rosenquist.org.

16. Amendments

- We may amend this Statement without prior notice at any time as required. Such changes will become binding on you upon your first use of LactaHub’s website after the changes have been implemented. The version published on LactaHub’s website is the version currently applicable, and we recommend to re-read this Statement on a regular basis.

Status of the Data Privacy & Cookies Statement: 6 May 2021.