

Company number: 4354366

Charity number: 1147471

Privacy International

(A Charity Company Limited by Guarantee, company number 4354366)

Audited Financial Statements

and

Trustees' Report

for the year ended 31 January 2021

Privacy International

(A Charity Company Limited by Guarantee, company number 4354366)

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Charitable Company Information for the year ended 31 January 2021

Status: Privacy International is a company limited by guarantee and a registered charity governed by its memorandum and articles of association. The directors of the charity are its trustees for the purposes of charity law and throughout this report are collectively referred to as the trustees.

Charity name: Privacy International

Company registration number: 4354366
(England & Wales)

Charity registration number: 1147471

Registered office: 62 Britton Street
London EC1M 5UY

Operations address: 62 Britton Street
London EC1M 5UY

Trustees who held office during the year:

Eve Salomon	
Peter Noorlander	
Benjamin Elihu Wizner	
Susan Gardner	
David Victor Stephen Viney	- Resigned 31 December 2020
Holly Marie Ruthrauff	
Stephen Josef Tibbett	
Antonio Michaelides	
Natalie Carsey	- Resigned 30 June 2020
Ahana Datta	- Appointed 1 February 2021
Werbayne Ruthven McIntyre	- Appointed 1 February 2021
Professor Joshua Castellino	- Appointed 1 February 2021
Amanda Borton	- Appointed 1 February 2021

Chairperson: Eve Salomon

Senior Statutory Auditor: **Anthony Armstrong FCA**
Armstrong & Co
Chartered Accountants & Statutory Auditor
4a Printing House Yard
Hackney Road
London E2 7PR

Solicitors: **Covington & Burling**
265 Strand
London WC2R 1BH

Bankers: **Barclays Bank**
1 Churchill Place
London E14 5HP

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Trustees' Report, incorporating the Directors' Report for the year ended 31 January 2021

1. INTRODUCTION

The Board of Trustees (who are also directors of the charity for the purposes of the Companies Act) submits their annual report and audited financial statement for the year ended 31 January 2021.

The Trustees confirm that the Annual Report and Financial Statements of the charity comply with current statutory requirements, the requirements of the charity's governing document and the provisions of the Statement of Recommended Practice (Charities SORP FRS102) "Accounting and Reporting by Charities" issued in 2014.

2. STRUCTURE, GOVERNANCE AND MANAGEMENT

Privacy International is a registered charity and a company limited by guarantee in England and Wales. The organisation is governed by its Articles of Association, incorporated on 16 January 2002. The Articles were updated in September 2014 to implement changes to reflect our charitable status (Charity Registration No: 1147471).

Privacy International's governing body is the Board of Trustees, which meets up to five times a year. The primary responsibility of the Board is to provide strategic leadership by formulating and reviewing Privacy International's strategic aims in consultation with staff, setting overall policy, regularly evaluating the charity's performance and risk management, and ensuring compliance with UK law.

At any one time the number of Trustees shall not be less than five, and no more than twelve. New Trustees are recruited through an open application process. Appointments are made not only on the basis of individual merit, but also taking into consideration the existing expertise and experience of the Trustees.

New Trustees receive information on Privacy International's work, their duties as Trustees, and take part in induction meetings with the Executive Director and other members of the Privacy International staff.

Trustees

The Trustees of the charity who held office during the year are set out on page 3.

Financial controls

Privacy International continues to strengthen its financial management systems. As the organisation grows, we work hard to ensure that PI is accountable to the public, our partners, and our funders.

All expenditure is carried out with reference to Privacy International's multi-year strategic plan and annual workplan, as approved by the Board prior to the start of each fiscal year. Financial procedures have been developed to monitor and evaluate the charity's finances, including quarterly management accounts, which are prepared for review by Trustees, prior to each meeting of the Board.

The Board is assisted in taking decisions relating to budgeting and forecasting by the Finance and Audit Committee, which consists of three Trustees including the Treasurer. The Committee is responsible for recommending finance management policy to the Board and ensuring that existing policies are implemented. The audit function of the Committee is to consider the adequacy of risk management, internal controls, and governance.

Risk statement

Privacy International takes the safety, security and wellbeing of its staff, consultants, partners and contracted sources and researchers very seriously and fully accepts our duty to provide a reasonable standard of care to those performing activities on our behalf. Our mission and operating locations inherently mean that our staff, consultants, partners, contracted sources and researchers are exposed to safety and security risks. Our approach to managing risk is one of risk management rather than risk aversion; however, we do not seek to engage in high-risk activities.

Our appetite to accept risk will always take account of our mission. As such, there may be specific situations where we may decide to accept risks above our stated risk appetite. When we do this, the process will be informed by the criticality of the proposed work, consideration of the potential impacts to our staff, partners, consultants, contracted sources and researchers, and will include additional controls and be approved by the Executive Director. In cases of particularly high risk, the Chair will also be included in the approval process.

PI believes that supporting mental health is integral to building a more resilient organisation. Staff who feel supported will in return contribute to a balanced and healthy workplace. Wellbeing management is an integral part of Privacy International's global risk framework.

As well as the on-going (managed) risk to staff who travel, our two main organisational risks are around our funding and the geopolitical uncertainty, now exacerbated by the ongoing global health crisis. We are always looking to diversify our funding and attract multi-year funding awards to minimise our financial risks. The UK leaving the EU, together with the ongoing health crisis bring uncertainty about our ability to engage internationally and retain international staff, while also putting additional stress on our staff in these uncertain times.

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Risk management

Risk management is an essential part of the operations of Privacy International and a key responsibility of the Board, with a Risk Management Policy and framework in place. Trustees review the major risks to which the organisation is exposed, and the measures taken to mitigate them, at each of their meetings. The executive team reviews these risks regularly during the year and risks are identified and monitored for each area of operation as well as for significant new activities.

The risk register has been developed with reference to the UK Charity Commission and National Audit Office guidance and UK Charity Law and is regularly updated and comprehensively reviewed annually by the Board.

Whistle-Blowing

Privacy International is committed to maintaining the highest standards of integrity, honesty and professionalism in the workplace and to complying with its legal obligations. Whilst Privacy International makes every effort to ensure that its business is conducted according to these standards, employees may be aware of, or suspect, certain failings or wrongdoings within the organisation and they are encouraged to alert the organisation to such concerns so that they can be remedied. Information from concerned third parties is a very important element in detection, especially of corruption where formal controls can be made ineffective by collusion.

The whistle-blowing policy was approved by the Board in 2017 and applies to all employees, volunteers and contractors, both in the UK and overseas.

Remuneration Policy

The remuneration of staff is guided by PI's Values and Competency Framework as set out in the organisational Staff Handbook, outlining roles and responsibilities, ensuring that each employee is rewarded in line with the level of their role and our overall remuneration structure. The remuneration of the Executive Director is decided by the Board of Trustees.

3. OBJECTIVES AND ACTIVITIES

Privacy International's objects are to promote privacy as a human right (as set out in the Universal Declaration of Human Rights) throughout the world, specifically:

- a) To raise awareness of, to conduct research about, and to provide educational materials regarding threats to personal privacy;
- b) To monitor and report on surveillance methods and tactics employed against individuals and groups;
- c) To work at national and international levels towards the provision of strong and effective privacy protections;
- d) To monitor the nature, effectiveness and extent of measures to protect privacy, and to seek ways through information technology to protect personal information.

Mission

We campaign for legal and technological solutions to protect people and their data from exploitation.

Privacy International campaigns against companies and governments who exploit our data and technologies. We expose harm and abuses, mobilise allies globally, campaign with the public for solutions, and pressure companies and governments to change.

Vision

Freedom and privacy will be the foundations of tomorrow's societies.

People are enabled by technology to explore their identities, speak their minds, and live with dignity. They will be free from exploitation and in control of their lives.

Legacy

Privacy International has been at the forefront of privacy, technology and human rights since 1990. We entered this field when the internet was still in its infancy, and police surveillance meant stationing officers outside a suspect's home. Privacy was a poorly understood concept.

Our longevity means that we are uniquely placed to understand the complex and changing relationship between technology and human rights. Now the issues we are working on are growing more pressing and urgent. Privacy continues to rise on policy agendas across the world and we are prepared to engage.

Over our history, PI has developed the concept of data exploitation, focusing on how companies and governments develop programmes, policies, and systems that exploit peoples' data to further their own goals. We also helped develop international human rights foundations for privacy, technological analyses of surveillance programmes, and necessary legal frameworks for addressing surveillance. We continue that work today under our four strategic areas of i) corporate exploitation, ii) government exploitation, iii) dignity and iv) democracy.

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4. PUBLIC BENEFIT

Direct beneficiaries of our work are i) the general public across the world through our advocacy, public engagement, and educational work, and ii) public interest civil society organisations across the world through our capacity-building and support.

PI makes a concrete difference across the world, compelling companies and governments to change their practices and policies. Our extensive track record of achievements across the world includes uncovering technological risks, leading global campaigns, intervening in courts, and motivating regulatory reform to prevent misuse of technology and consequent abuses.

Our research and investigations help inform the public about the risks to privacy, often secret, and the power imbalances that arise. Through extensive outreach and media engagement, we ensure our work reaches expanded audiences across the world. Changes in practices by governments and companies as a result of our work have benefited people globally, including as national publics and customers.

We run education initiatives and projects in countries, working cooperatively with others to reach people who are at risk, and to help communities ensure that laws and technologies protect people. In 2020, we worked with 26 partner organisations in 21 countries to better understand policy and technology, conduct outreach and public engagement, and strengthen their organisations.

We supported our partners across the world and together we explored issues at the intersection of health, gender, welfare and surveillance. Our partners sought our guidance on draft regulations and laws around issues as diverse as pandemic response (e.g. Brazil, Colombia), anti-terrorism laws (e.g. Philippines), social media surveillance (e.g. Argentina), HIV and AIDS prevention (Kenya). Our technical research methodologies were replicated and used by others and our technical guides have been used and recommended by key players in the UK migrants' rights sector.

In setting our annual workplan, the Board of Trustees have regard to both the Charity Commission's guidance on public benefit, and the promotion of human rights for the public benefit. The Trustees confirm that they have complied with section 17 of the Charities Act 2011 and are satisfied that the aims and objects of the charity, and the activities reported on to achieve those aims, meet these principles.

5. ACTIVITIES, ACHIEVEMENTS AND PERFORMANCE IN 2020

Strategy

Throughout 2020, we continued delivering on our commitments as set out in our strategy approved by the Board in 2018 and launched in 2019, with PI's work focusing on four key areas:

Defence of Democracy and Dissent – Democratic rights are at risk from political parties' and other actors' increasing exploitation of data, and new safeguards and vigilance is required. Under this strategic area, PI continues fighting against mass surveillance and combating the monitoring of civic spaces.

Safeguarding Peoples' Dignity – Data is increasingly used in instances where people are most vulnerable, exposing them to further risks. PI campaigns to challenge identity systems, to protect migrants, to safeguard communities at risk and protect access to economic-social and cultural rights with dignity.

We continue our leadership in exposing the more systemic **exploitation of data by industry and governments** and seeking changes in laws and practices.

We continue to focus on building a good and resilient organisation and movement. We work to support staff to grow and learn how to address new challenges. We also continue to build capacities of partner organisations to fight everywhere. And we strengthen our abilities to respond to growing and emerging risks.

5.1 Programmatic activities - highlights

PI's Strategic Area of **Defence of Democracy and Dissent** focused on:

- **Protecting the Election Cycle** – to counter exploitation of data in elections, we developed guidance for election observers on assessing the use of data in elections, to be incorporated into observation methodology, engaging with in-field election observer missions, and adding new focus on strengthening privacy in the introduction and use of new voting technologies.
- **Targeting Political Exploitation** – to counter the growing political data exploitation industry, we exposed and challenged companies through investigating and filing complaints, and working towards improving regulatory safeguards against political data exploitation.
- **Ads transparency** – to limit data exploitation for political ads, we revealed the practices, demanded transparency, and worked to prevent companies from continuing their opaque and invasive targeting.
- **Resisting Civic Dystopias** – to challenge the procurement and deployment of surveillance techniques around the world, we engaged and educated legal communities, civil society generally, and groups focused on protest and supporting migrants about the relevant surveillance techniques.

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- Protecting Civic Spaces – to stop mass surveillance practices by governments, we worked to ensure laws or regulations are enacted or enforced to prevent human rights abuses with regard to mass surveillance practices.

Our Strategic Area of **Safeguarding People's Dignity** focused on:

- Protecting Identities – to protect people in response to the deployment of expansive national ID systems, we developed amongst civil society the capacity to present a nuanced and strategic approach to ID, identification and identity; thereby supporting key actors to articulate cogently the risks of digital identity systems, advocating that suppliers and adopters design and implement systems that by default protect people and uphold the highest security standards.
- Protecting the Targeted – to ensure that the security baseline for everyone is improved, we focused on improving local and global cybersecurity and cybercrime policies, working with the targeted groups and individuals, making demands of both government and industry whilst assisting and amplifying the voices of people who are in a vulnerable position.
- Protecting Dignity – to protect peoples' rights to access economic and social rights, we targeted government bodies and companies that are undermining and exploiting our access through the use of technology and vast data processing practices, with specific focus on reproductive rights and data management and exploitation in welfare services.
- A Humane Approach to Immigration – to counter governments' increasing use of data against migrants, we supported expert civil society organisations and others to integrate privacy and data issues into their programmes on immigration policies.

PI's Strategic Area of **Corporate Exploitation** focused on:

- Data Brokers in Disguise – to prevent companies from exploiting peoples' trust and data, we exposed companies that while acting as *information services* had in fact been for years data brokers with unprecedented and invasive access to personal data of vulnerable people; and we campaigned to change these business practices.
- Digital Data Dominance – to stop companies from expanding their data exploitation practices through acquisition, we empowered and educated regulators to better understand the interplay between data and competition and raised public knowledge around the effects of anti-competitive behaviour and the effects of digital mergers, and empowered individuals to object to abusive practices.
- Privacy Isn't a Luxury – to ensure that security and privacy protections apply to everyone without regard to wealth, we pressured Google to ensure that low-cost Android manufacturers globally protect their devices from security and privacy faults to the same degree as high cost devices.
- Data Brokers and Ad-Tech – to stop the race to the bottom in the targeted advertising industry, we worked to reduce the profitability of exploitative and inherently unfair business models by advocating for less data invasive solutions that don't rely on intense data collection and worked to educate the public to mobilise against pervasive and manipulative advertising.

Our Strategic Area of **Government Exploitation** focused on:

- Financial Drivers for Global Surveillance – to challenge the EU's assistance of surveillance agencies in non-EU countries, we ensured that the relevant oversight and regulatory bodies are aware of PI's recommendations, while seeking to integrate safeguards and good practices into these initiatives.
- Global Counter-terrorism Policies as Drivers of Surveillance – to push back against the UN security bodies' agenda to expand surveillance globally, we advocated for safeguards on biometrics, intelligence sharing and financial surveillance.
- System Exploitation – to limit governments' secretive abilities to hack systems remotely, through research and legal action we ensured that these powers include minimum human rights safeguards or are prohibited, advocated for strong privacy standards by companies and we worked to educate other civil society organisations to make sure they have a better understanding of their security vulnerabilities and access to tools to address them.
- Unmasking Policing Inc. – to prevent industry and governments from deepening relationships across the world to jointly deploy surveillance systems, we collected and revealed stories to raise awareness about the privatisation of surveillance and to motivate the public against abusive practices that threaten our freedoms and dignity.

5.2 Key achievements in 2020

In accordance with our values, PI picks its targets with great care, and we identify the very specific changes in behaviours we wish to see. We have growing experience in what tactics work under which circumstances, and we are also experienced enough to know that we have much to learn and sometimes things work based on happenstance and we aren't entirely in control of success. We are very aware that we must move quickly and carefully, with full knowledge that our chain of intended results that contribute to systemic change could take years to complete.

Over 2020 we have achieved remarkable results. We exposed and uncovered, we mobilised allies, we campaigned with the public, and we demanded change and higher standards. Courts decided in our favour, including agreeing that national security isn't an excuse to ignore the rule of law. Regulators learned from our work, finally acting against data brokers and questioning Big Tech

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mergers. Companies felt intense pressure from our campaigns, changed their practices and in some cases, ceased offending behaviours. In 2020 we produced and published 16 reports, 61 Long Reads, 58 News and Analysis articles. We filed 8 legal interventions and 3 regulatory complaints. We have been engaging with actors and stakeholders across Academia, Civil Society, International Development Organisations, and Regulators. We worked with 26 organisations from 21 countries in our network.

We Mobilise Allies Globally: key results in 2020

We identify allies all around the world, establish partnerships, build their capacity in a global privacy movement. Together we work with people, conduct research, and run advocacy campaigns at the local, regional and international levels regarding harmful practices by governments and companies. We see great potential for technology, yet governments and companies are resistant, reluctant, or sometimes refuse to implement basic safeguards in law and technology.

We engage with and mobilise civil society organisations, human rights activists, academia, journalists, technical community and other relevant stakeholders to seek those safeguards and build stronger futures for everyone.

Results

We conducted considerable advocacy at various fora by mobilising over a hundred organisations and institutions across the world. Some of the highlights and examples are:

- o We engaged with new allies: with the Carter Center in Myanmar we worked on a joint assessment of Myanmar's elections, including engaging with three diaspora Rohingya groups in the UK, Canada and Japan writing to Bank Austria and The Austrian State Printing House (OeSD) about their funding/involvement in Myanmar's proposed digital ID scheme.
- o We assisted the World Health Organisation's Global Health Ethics Unit and Digital Health Department in organising a civil society consultation to provide feedback for guidance that WHO is producing on the ethics and governance of artificial intelligence in health.
- o We were invited by the Office of the High Commissioner on Human Rights to provide an internal seminar on surveillance and privacy concerns emerging with Covid-19 responses to inform and shape the work of their staff around the world that work to monitor the present crisis and its impact on human rights.
- o PI's work on low-cost devices informed a petition that has been filed in the Indian Supreme Court asking for disclosure of all pre-installed apps in the outer packaging of mobile devices in major regional languages.
- o Refugee Action (which works with over 150 organisations in 47 locations in the UK) added PI's guides among recommended resources for migrants and CSOs to the Good Practices webpage. PI's settings guides for users of major social networks and platforms have been included on the official website of the City of Sanctuary UK - an organisation working in the asylum sector.
- o Together with over 60 other civil society organisations and experts we published a joint statement calling for universal advertising transparency by default, as a prerequisite for any measures dealing with online political ads.
- o A European Parliamentary Forum referenced our reproductive rights evidence pack in their own list of essential resources documenting anti-gender initiatives.

Impact stories:

- o By working with hospitals in the UK to put pressure on a data broker that took data on mothers and infants in maternity wards, a number of hospitals cancelled their contract with the data broker Bounty. Bounty had tried to conceal their practice as an 'information service', using that excuse to have unprecedented direct access to new mothers and to gather their data. Bounty is now closing down, though we are monitoring in what form its data services will return.
- o The UK NHSx asked PI's Executive Director, in his personal capacity, to join the 'ethics board' for the UK Government's Covid contact-tracing app. This gave us access to insights about pandemic response, technological capacities, and other challenges at a key moment in pandemic response globally; and allowed us to build links across sectors and countries. With this knowledge we emphasised the risks associated with the government's chosen technology and design, how their design choice would lead to exclusion. The UK government, and others too, later chose to change paths and seek a less invasive system that could work to help more people. This work elevated our voice in global media and in policy circles.

We Expose Harms and Abuses

PI reveals mechanisms, harms, abuses operated by industry and governments against people, through their systems, services or practices.

These powerful actors use modern technology to gain more power or money, ignoring a huge negative impact on people, democracy and human rights. We monitor, analyse, research and ultimately expose all forms of violations associated with use of new technology and their impact on people.

We use and develop innovative methodologies for technical research, that are widely recognised and replicated by journalists, others in the tech community, civil society, and academia.

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Results

We produced numerous reports and analyses for various audiences.

- o Our online Covid-19 global resource – that included case studies, in-depth analysis of specific solutions, built to assist others tackling these issues and for media to provide in-depth and international information to their audiences – was referenced in more than 25 analytical materials or briefings related to the Covid-19 pandemic prepared by CSOs, Private Companies, Development Organisations/Donors and generated substantial media interest. It has also been one of the most viewed content items on our website, being accessed up to 72k times per month since April 2020.
- o We documented a series of data exploitative tactics used to delay or curtail people's access to reproductive healthcare – this effort together with our partners included case studies from Indonesia, India, Kenya, Brazil, Argentina, and Peru. Our submission to the UN Working Group on Discrimination Against Women and Girls on the sexual and reproductive health and rights of women and girls in situations of crisis highlighted the ways in which data exploitative technologies can obstruct the realisation of sexual and reproductive rights.
- o We informed the UN Working Group on the use of mercenaries regarding the involvement of private companies in immigration and border management sectors and existing violations of the right to privacy of migrants. Their subsequent report, referencing our work, led to the organisation of a joint event for the launch of this report with the UN Working Group, and the event recording is promoted on the page of the UN Working Group on the use of mercenaries as video resource.
- o We provided expert witness testimony to the Kenya's High Court, to support the case from OSF/ Nubian Rights Forum regarding the Government's proposed ID systems. Our testimony was described by the Court as "persuasive" on the issue of the dangers of biometrics.
- o Our expositions on the use of warrants by UK police agencies to search mobile phones, and our technical research on mobile phone extraction was incorporated into a report by the Law Commission. The report also references our prior work on Digital Stop and Search and Cloud Extraction Technology, as well as our concerns surrounding the use of search warrant application forms.
- o Our technical research methodologies were replicated and used by partner organisations in Uganda and Argentina; and by media including the BBC.
- o We analysed publicly available material in order to compile profiles of companies involved in political campaigning: Aristotle (USA), CJT Group (UK), Data Sciences Inc. (Canada), eXplain (France) and uCampaign (USA). The resulting information provides a snapshot of how the digital political campaign sector uses increasingly data-driven campaigns.
- o We published an in-depth analysis into inconsistent implementation of transparency tools by social media platforms for political advertising.

Impact stories

- o In order to address PI's and the Information Commissioner's concerns regarding mobile phone extraction, the UK Home Office are going to introduce a new statutory measure (planned for summer 2021). Further, the College of Policing is going to be introducing revised Guidance in 2021 on how to deal with mobile phone extraction, which will be subject to public consultation to which PI can respond in the future.
- o Two menstruation apps (Maya by Plackal Tech and MIA by Mobapp Unlimited) which we were primarily targeting for their data sharing practices have ceased to share data with Facebook. This has been confirmed through traffic analysis that we re-did to observe the change. (One of the apps previously shown not having a functioning link to its privacy policy also fixed that error.)
- o PI's research and advocacy regarding websites providing mental health services in France, Germany and the UK resulted in 42 out of 132 of the tested webpages reducing the number of third parties that users' data was shared with.
- o PI's engagement with Yoti (a UK-based digital identity provider) resulted in improvements of the company's privacy policy, which now includes a clearer description of how users' personal data (including photo and passport data collected by the app) are processed.
- o PI's Third Direction legal challenge in the courts forced the UK Government to introduce new legislation. In late 2020 the UK Government presented to Parliament a new Bill that would amend Part II of the Regulation of Investigatory Powers Act 2000 (RIPA) to create a new process of 'Criminal Conduct Authorisations'. The authorisations would constitute an express power for MI5, police forces, and a range of other public authorities to authorise their agents and informants ("Covert Human Intelligence Sources" "CHIS") to commit criminal offences, with explicit oversight and safeguards.

We Demand Changes and Higher Standards

Changes in technology, laws and policies are required to implement necessary safeguards for our rights. Our positions and proposed solutions that drive our communications and advocacy are based on evidence and standards. We continuously keep track of new developments globally and respond to suspicious or harmful initiatives from governments and companies that threaten fundamental rights. When necessary, we take action through courts to ensure our adversaries abide by the law and respect the rule of law. We inform and seek redress from regulators and public authorities in regard to the identified harms and violations.

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Results

- o The UK competition regulator mentioned PI's concerns in their report on online platforms and digital advertising, adopted a more privacy focused approach and suggested establishing a UK Digital Taskforce and asked PI to contribute in shaping it as an important actor.
- o PI's positions are reflected in a new report of an UN special procedures thematic expert group highlighting responsibilities of private actors in human rights abuses and lack of oversight and accountability of the system. It calls on states to strengthen regulation of these companies actions and to be transparent when deploying private actors in immigration and border management.
- o PI's litigation against MI5, MI6 and GCHQ in relation to the processing of bulk personal datasets and bulk personal data has been mentioned in the Investigatory Powers Commissioner's Office report as an important factor that contributed to improvement of their practices around both practices.
- o The UN Human Rights Committee recently adopted the General Comment No. 37 on Article 21 - on Right of peaceful assembly of the International Covenant of Civil and Political Rights (CCPR/C/GC/37) which incorporated suggestions provided by PI. Particularly, paragraph 62 summarises the key points and references the technologies listed in PI's submission.
- o Our joint submission to the UN Special Rapporteur on contemporary forms of racism, racial discrimination, xenophobia and related intolerance provided information on specific digital technologies in service of border enforcement and administration policies, as well as an overview of how such practices amount to serious violations of the right to privacy of migrants and as a result facilitate violations of other human rights of migrants, refugees, stateless people, non-citizens and other groups (in collaboration with our partners in Mexico, Peru, Chile and UK).
- o The Committee on the Elimination of Discrimination Against Women (CEDAW) included in its final list of issues as part of its review of Peru a number of the considerations outlined in the joint submission we presented with our partners. This is key to ensure that the issues we are exploring at the intersection of data, technology and gender are documented and addressed by human rights bodies and reporting mechanisms.
- o PI's analysis is reflected in European Commission report on "Artificial Intelligence and Digital Transformation: early lessons from the COVID-19 crisis". The report considers recent developments and identifies early lessons with respect to the present and future development of artificial intelligence and digital transformation in Europe, focusing in particular on health data.

Impact Stories

- o Following years of our work exposing the dangerous processing of bulk data by governments, the Court of Justice of the European Union ruled that mass data retention and collection practices for national security purposes undertaken by member states must comply with EU law, and therefore have to be subjected to its privacy safeguards.
- o We won our judicial review challenge to a 2016 decision of the Investigatory Powers Tribunal on hacking by government. The UK High Court has held that the security and intelligence services can no longer rely on 'general warrants' to interfere with property, including computers. The landmark case ruling applies 250 years of legal precedent to the modern age.
- o Following PI's submissions and expert evidence, the European Commission launched an in-depth investigation of the Google/Fitbit merger, offering to PI the "interested third person" status. We were deeply involved in many stages of the review. Although the Commission decided to approve the merger, the decision put an emphasis on data as a parameter for assessing big tech dominance – just as we sought to achieve.
- o Following our complaints to regulators in 2018 about the data broker industry and the 'hidden data ecosystem', the UK Information Commissioner's Office took enforcement action in 2020 against one of the largest global companies, Experian. As a result, Experian is directed to make fundamental changes to how it handles people's personal data within its direct marketing services. It also sends a clear signal to the industry that they need to adhere to the law.
- o Supporting our partner in Uganda led to the country's first investigation undertaken by its new data regulator finding that Safeboda, a ride-sharing app whose data sharing practices and policies our Ugandan partners had challenged, had unlawfully disclosed data to a third-party, and was required to change its policy.
- o Days after we asked the Commission Nationale de l'Informatique et des Libertés ("CNIL") to investigate the compliance of Doctissimo (a French health information site) data collection and sharing practices with the GDPR, the company changed its consent mechanism.

We Demand Changes and Higher Standards

PI has developed a depth of knowledge about the risks for people posed by weak technologies, poor safeguards, and manipulative discourse. It's not enough to just show the problem – we must engage and campaign for change. With people's voices and support we can raise these issues with the powerful actors who build and shape the systems, to improve the situation for everyone.

This is a very new area of work for PI. To undertake it while respecting people's rights, we essentially built new databases and systems, and decided to write the new textbook on how to engage the public in a way that protects their data and lives up to our

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purpose and values. We want to educate, inspire, and involve people in the issues we worry about. In 2020 we launched our new brand, deployed a new website, and developed a new public engagement platform (launched in 2021). We created public educational tools, and are building the tools and infrastructure and experiences to help channel peoples' voices.

Results

- o We encouraged our supporters to learn more about what data companies keep on them and provided advice how they can take action.
- o We submitted an open letter to Google with 50 other organisations, calling for a stop to the exploitative pre-installed software on Android devices and encouraged people to join us in this action.
- o Together with new allies from the migration sector we worked to develop a guide for migrants and asylum rights organisations about privacy settings - for anyone concerned about their social media accounts being monitored by public authorities, but it's especially targeted at people from minority and migrant communities who may be disproportionately affected by various forms of surveillance (available in multiple languages).
- o Some of the most visited items on our website are now 'technical explainers' and 'guides' – both being content types we previously did not generate. We also have guides on filing FOI requests, how to make most of DSARs, on competition, data and interoperability in digital markets, on good security practices for chat apps, how to protect yourself from online tracking, how to minimise targeted ads on social media.
- o Our media profile increased significantly in 2020, despite being already quite high for an organisation of our size. In 2020 we received around 300 media enquiries from journalists; and our media coverage grew by 150% since 2019 (from 198 pieces of coverage in 2019 to 506 in 2020).

Impact Stories

- o In 2020 more than 8000 people signed on to our campaigns against our adversaries. This showed positive results of the remarkable work to build our tools and our brand, to position our often 'complex' work in more public-facing ways to engage audiences.
- o We invited our supporters to raise concerns and objections to Google/Fitbit merger: during summer 2020, over 2,500 people signed PI's public petition opposing the proposed Google/Fitbit merger. The European Commissioner for Competition responded by thanking petitioners for their concerns and cooperation, just as the Commission opened the next phase of investigation of the merger.

5.3 Challenges encountered in 2020

Of course the ongoing global health emergency proved to be challenging for everyone. PI's working conditions certainly changed, with a renewed emphasis on staff wellbeing, while maintaining our procedures and technical infrastructure when switching to working remotely. Our activities had to change, reducing our travel, direct engagement with civil society in other countries and suspending ambitions to open an office in Europe.

In late February 2020 we began to prepare for the eventuality of the crisis escalating, making some hard decisions about our plans for the year, testing our technical and wellbeing capacities for remote working, and re-assessing all travel plans. The Board of Trustees was regularly updated on key developments. PI's office remained open for as long as it was reasonable for those who needed it. PI moved towards remote working in early March 2020; following a series of UK government announcements, we mandated remote working.

Our strategy enabled us to engage in some key aspects of the pandemic and particularly in the issues arising from governments' and companies' responses to the crisis. Typically all our strategic areas were relevant, and tactically, we were able to respond to pressing developments to create educational content for the public, inform public-interest groups as they developed their positions, engage with media organisations across the world. We engaged our partners in the Network and across civil society to identify the emerging trends, and to articulate how pandemic responses need to respect fundamental rights. We maintained global monitoring of developments, tracking them on our website for the public to see what was going on across the world. PI's perspectives on pandemic response were widely sought by media, as well as by industry and governments.

While we continued to operate mostly without significant interruption, our annual plan for 2020, as approved by the Board in December 2019, continued to be affected by this uncertain environment. With the support of our board and our funders, we were able to identify options, carefully consider our new priorities, adapt our planning, commit to new results, and focus on delivery.

We reduced working hours, reduced expectations upon staff, ensured that norms were altered to develop firmer balances between work and personal lives; while continuously checking in to see how people were coping in isolation, away from loved ones, without support institutions like schools and nurseries.

Trustees' Report, incorporating the Directors' Report for the year ended 31 January 2021

As we are all now navigating this long pandemic, we maintain a close watch on what more we can be doing to better support our staff. For instance, our wellbeing programme has been tested intensely since the start of the crisis. We were fortunate to receive new funding opportunities that will allow us to explore even more comprehensively our internal processes, as they are tested and adapted to new ways of working.

We were regularly in touch with our partners to reassure them PI remained open to conversations about plans, possible delays, and contingency planning. We reiterated that their health and wellbeing is of utmost importance to PI. Recognising challenges they were facing due to the pandemic and lack of resources, we worked with external experts to organise a set of virtual wellbeing workshops to provide partner organisations and their staff with tools and resources to assist in dealing with most pressing issues (managing stress, managing workload, managing new challenges within teamwork).

- o Pressured agencies to follow their established processes - our questioning and media reporting contributed to the EU border agency Frontex cancelling their plans to tender for "Service Contract for the Provision of Social Media Analysis Services Concerning Irregular Migration Trends and Forecasts".

6. MOVING FORWARD

The momentum and plans we developed in 2019 certainly helped us survive the disruptions of 2020. It is remarkable that we have even more momentum emerging from 2020. At our core, we are keen to make the most of our learnings around people management in these erratic times.

What we foresee as the largest challenges.

We think it is fair to say that our ability to foresee the future is limited to a six-month time horizon. We can't foresee the state of global economic health, politics, infrastructure, or how all these will affect peoples' lives.

Yet when change comes, it will come with unevenness. Some will unlock sooner than others in different ways. This jumpstarting will introduce greater uncertainty as to whether we go back to our workplaces, or do work physically in other countries. And when we do, people will move at different paces and require varying levels of care and flexibility as they get used to the "new normal".

What we are doing about it

The two year time horizon - until the end of the current strategic plan - is opaque to PI. In 2022 we have to start planning for our next steps, and identify the priority issues and how to ensure our resilience.

Although new practices by governments and domination by companies may seem unshakeable by the time that happens - ranging from bio-surveillance methods to immunity passports, from monitored borders to Big Tech's integration within our daily practices - we think that there will be key moments for essential decisions about what our world looks like after the pandemic. We will be ready to instigate the changes that are needed, and inspire learning from the mistakes made.

Months of working under conditions of pandemic made our focus on building strong, resilient organisation even more important: we need to provide our staff with support, structures and systems that allow them to be most productive while also caring for their wellbeing in these unprecedented times. As the environment continues to be extremely volatile, we keep working to address any shortcomings identified by the past months of dramatic adaptations to new ways of work.

What we're doing to deliver our strategy in 2021

As for our strategic areas, our work aspires to achieve systems-level impacts that will cover this transition period.

Defending Democracy and Dissent

As a result of our work in 2021, we want to see:

- o Data exploitation in the election cycle is minimised due to enforced or new legal frameworks prohibiting such practices, active regulator involvement, and pressure on companies.
- o Use of surveillance technologies by police and government agencies is clearly regulated, and those technologies, policies and practices are transparent and uphold human rights safeguards.
- o Mass surveillance practices are limited or restrained as a result of improved or enforced legal frameworks and increased public concern about surveillance technologies.

Protecting Peoples' Dignity

As a result of our work, we want to see:

- o Governments and global policy elite stop seeking multi-purpose identity systems as the solution to their problems and instead seek identity solutions that do not exploit data, that include safeguards, and that verifiably do not target, discriminate, disenfranchise, and exclude people.
- o Future health care and social protection programmes uphold human rights and eliminate risks of discrimination or exclusion, as policy-makers make informed decisions on the basis of well-documented abusive data processing activities illustrating the need for comprehensive and effective safeguards to protect people.

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Trustees' Report, incorporating the Directors' Report for the year ended 31 January 2021

- o Reduced data intrusive practices used by governments to identify, track, and monitor migrant communities to limit/curtail enjoyment of their rights/freedoms, and enforce strict vetting mechanisms at its borders and beyond.

Corporate Exploitation

As a result of our work, we want to see:

- o Brands and advertisers have limited targeted online advertising and use less intrusive models.
- o Privacy abusive business models are widely constrained and condemned by regulatory precedent defining the vague concept of legitimate interest under GDPR to protect people.
- o Protecting rights into the future -- we will continue to research and develop positions on new technology and work with regulators to make sure laws and regulations contain safeguards and security measures that prevent human rights abuses interpreted, enacted or enforced.
- o The AdTech industry is impacted by the reduction in revenue streams and key brands pulling out. Fewer websites offer targeted advertising and opt for less intrusive methods, therefore reducing the amount of tracking and data collection happening online.
- o Data brokers' core business model is financially threatened by loss of revenue streams and legally questioned at a large scale as a result of decreased use of third-party databases to target apps.
- o Low cost devices are more secure, privacy respectful and provide greater control to their users.
- o There is a comprehensive regulatory framework including law, regulation and relevant guidance that force employers to adopt necessary safeguards and security measures for potential work surveillance practices.
- o Anti-competitive, data abusive, and consumer disrespecting practices sanctioned or restricted on a global level.

Government exploitation

As a result of our work, we want to see:

- o Stronger technical and legal protections apply when government and international bodies fund or support surveillance and ID systems in countries around the globe.
- o Less aid money will be diverted for the development of surveillance.
- o Smaller surveillance and border industrial complex profiting from aid programmes.
- o Governments change their approach to public-private partnerships/collaborations adopting new standards of transparency.

Core and organisational development

To enable PI's work, in 2021 we will:

- o Build a comprehensive HR strategy and organisational resiliency – strengthen internal processes and build organisational capacity, striving to sustaining our expertise and develop new methods of work to be a useful and recognised as a good organisation.
- o Public engagement strategy – build and improve our procedures for engaging with beneficiaries and using that engagement to inform our work.
- o Public fundraising strategy – building on robust structures to engage with the public, work towards converting their support into a stable income stream.
- o Redesigning International Privacy Network – build on the prior experience of coordinating global network, we will continue to engage with actors of change and work to identify new spaces, disciplines and domains, in particular those aimed at capacitation and learning, and dissemination.

7. FINANCIAL REVIEW

Results for the year

The results of the period and financial position of the charity are shown in the annexed financial statements.

Expenditure for the year decreased to £1.85m (2019: £1.96m) mostly as an effect of scaling down some of the programmatic activities like travel and partner engagement across all programmes of the new strategic plan.

The incoming resources for the year were £1.98m (2019: £4.2m) - the significant difference in income as compared to previous year reflects large grant income recognised in 2019, which PI still holds as accrued income, amounting to £1.68m – for resources promised but not yet received (3 grant agreements signed in 2019 and 1 grant agreement signed in 2020, but funds expected to be received over the course of years 2020-2022).

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The total funds of the charity at the end of the year were £4.2m. This included £529k in restricted project reserves and £3.68m in general funds, which included £3m we are obliged by the donors to spend on core activities by late 2022, £78k in designated funds, and general unrestricted funds of £567k that are available to provide operational working capital to address the financial risks surrounding projected income and expenditure.

Reserves Policy

Taking into account the risks, funding sources, and complexity of Privacy International, the Board of Trustees has set a reserves policy for Privacy International aiming for 6 months' running costs – resulting in a target of £750k (currently: £567k).

The Executive Director and Resources Director continue to work with the Board of Trustees to maintain a policy of increasing unrestricted reserves until they are built to a level that ensures that core activity could continue during a period of unforeseen financial difficulty.

Grants and donations

The staff and Board of Trustees of Privacy International are extremely grateful to the following organisations for their support over the past year:

- International Development Research Centre
- Luminate
- Oak Foundation
- Open Society Foundations
- Paul Hamlyn Foundation
- Swedish International Development Cooperation Agency

Volunteers and pro bono support

We would like to extend our thanks to the many individual volunteers who have contributed their time to Privacy International over the past year. Privacy International recruits and hosts volunteers throughout the year who work across our projects.

The Trustees also wish to record their appreciation to the many eminent lawyers who have contributed their expertise to our legal work. We hugely appreciate the support received from Blackstone Chambers, Doughty Street chambers, Matrix Chambers, Brick Court Chambers, Bhatt Murphy, Liberty, Hausfeld & Co LLP, independent counsel, and various university departments, law clinics and legal experts at Yale Law School MFIA Clinic, Harvard Law School Cyberlaw Clinic, Harvard Law School International Human Rights Clinic, University of Buffalo Law School Clinic, Legal Resources Centre in South Africa, LSE - Department of Law, Humboldt University - Internet Law Clinic, University of Edinburgh - Digital Media & IT Law Department.

We also remain extremely grateful to Covington & Burling LLP for their continued support for Privacy International's organisational development, including pro bono support for the further professionalization of our systems and processes for staffing and governance.

Senior Statutory Auditor


The statutory auditor, A D Armstrong FCA of Armstrong & Co, has indicated his willingness to be proposed for re-appointment in accordance with Section 485 of the Companies Act 2006.


Although not required, the trustees have determined that the charitable company be audited under the Companies Act 2006 for the year ended 31 January 2021. The charitable company would be required to be audited under charities legislation for the year ended 31 January 2021.

This report has been prepared in accordance with the special provisions of Part 15 of the Companies Act 2006 relating to small companies.

The trustees acknowledge and confirm their responsibilities for preparing the financial statements and providing appropriate information to the auditors as detailed in the Statement of Trustees' Responsibilities set out on page 15.

The financial statements were approved by the Board of Trustees on 20 September 2021 and signed on its behalf by:


signature


name Trustee

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Statement of Trustees' Responsibilities for the year ended 31 January 2021

The trustees (who are the directors of Privacy International for the purpose of company law) are responsible for preparing the Trustees Annual Report and the financial statements in accordance with applicable law and United Kingdom Accounting Standards (United Kingdom Generally Accepted Accounting Practice).

Company law requires the trustees to prepare financial statements for each financial year which give a true and fair view of the state of affairs of the charitable company and of its incoming resources and application of resources, including the income and expenditure, of the charitable company for that period. In preparing these financial statements, the trustees are required to:

- a) Select suitable accounting policies and apply them consistently;
- b) Observe the methods and principles in the Charities SORP;
- c) Make judgements and estimates that are reasonable and prudent;
- d) Follow applicable accounting standards and statements of recommended practice, subject to any material departures disclosed and explained in the accounts;
- e) Prepare the financial statements on the going concern basis unless it is inappropriate to assume that the charitable company will continue in operation.

The trustees are responsible for keeping adequate accounting records which disclose with reasonable accuracy at any time the financial position of the charitable company and enable them to ensure that the financial statements comply with the Companies Act 2006 and charity legislation. They are also responsible for safeguarding the assets of the charitable company and hence for taking reasonable steps for the prevention and detection of fraud and other irregularities.

Statement as to disclosure of information to auditors

So far as the trustees are aware, there is no relevant audit information of which the charitable company's auditor is unaware, and the trustees have taken all steps that they ought to have taken to make themselves aware of any relevant audit information and to establish that the auditor is aware of that information.

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Independent Auditor's Report to the Members of Privacy International

We have audited the financial statements of Privacy International for the year ended 31 January 2021 which comprise the Statement of Financial Activities, Statement of Financial Position, Statement of Cash Flows and the Notes to the Accounts to the Financial Statements, including a summary of significant accounting policies. The financial reporting framework that has been applied in their preparation is applicable law and United Kingdom Accounting Standards, including Financial Reporting Standard 102 'The Financial Reporting Standard applicable in the UK and Republic of Ireland' (United Kingdom Generally Accepted Accounting Practice).

In our opinion the financial statements:

- give a true and fair view of the state of the charitable company's affairs as at 31 January 2021 and of its incoming resources and application of resources, including its income and expenditure, for the year then ended;
- have been properly prepared in accordance with United Kingdom Generally Accepted Accounting Practice; and
- have been prepared in accordance with the requirements of the Companies Act 2006.

Basis for opinion

We conducted our audit in accordance with International Standards on Auditing (UK) (ISAs (UK)) and applicable law. Our responsibilities under those standards are further described in the auditors' responsibilities for the audit of the financial statements section of our report. We are independent of the charitable company in accordance with the ethical requirements that are relevant to our audit of the financial statements in the UK, including the FRC's Ethical Standard, and the provisions available for small entities, in the circumstances set out in Note 2 to the financial statements, and we have fulfilled our other ethical responsibilities in accordance with these requirements. We believe that the audit evidence we have obtained is sufficient and appropriate to provide a basis for our opinion.

Conclusions relating to going concern

In auditing the financial statements, we have concluded that the trustees' use of the going concern basis of accounting in the preparation of the financial statements is appropriate.

Based on the work we have performed, we have not identified any material uncertainties relating to events or conditions that, individually or collectively, may cast significant doubt on the charity's ability to continue as a going concern for a period of at least twelve months from when the financial statements are authorised for issue.

Our responsibilities and the responsibilities of the trustees with respect to going concern are described in the relevant sections of this report.

Other information

The other information comprises the information in the annual report, but does not include the financial statements and our report of the auditors thereon. The trustees are responsible for the other information.

Our opinion on the financial statements does not cover the other information and, except to the extent otherwise explicitly stated in our report, we do not express any form of assurance conclusion thereon.

In connection with our audit of the financial statements, our responsibility is to read the other information and, in doing so, consider whether the other information is materially inconsistent with the financial statements or our knowledge obtained in the audit or otherwise appears to be materially misstated. If we identify such material inconsistencies or apparent material misstatements, we are required to determine whether there is a material misstatement in the financial statements or a material misstatement of other information. If, based on the work we have performed, we conclude that there is a material misstatement of this other information, we are required to report that fact.

We have nothing to report in this regard.

Opinion on other matter prescribed by the Companies Act 2006

In our opinion, based on the work undertaken in the course of the audit:

- the information given in the trustees' report, which includes the directors' report prepared for the purposes of company law, for the financial year for which the financial statements are prepared is consistent with the financial statements; and
- the directors' report included within the trustees' report has been prepared in accordance with applicable legal requirements.

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Independent Auditor's Report to the Members of Privacy International

Matters on which we are required to report by exception

In the light of the knowledge and understanding of the charitable company and its environment obtained in the course of the audit, we have not identified material misstatements in the directors' report included within the trustees' report.

We have nothing to report in respect of the following matters where the Companies Act 2006 requires us to report to you if, in our opinion:

- adequate and proper accounting records have not been kept, or returns adequate for our audit have not been received from branches not visited by us; or
- the financial statements are not in agreement with the accounting records and returns; or
- certain disclosures of trustees' remuneration specified by law are not made; or
- we have not received all the information and explanations we require for our audit; or
- the trustees were not entitled to prepare the financial statements in accordance with the small companies regime and take advantage of the small companies' exemptions in preparing the trustees report.

Responsibilities of trustees

As explained more fully in the statement of trustees' responsibilities set out on page 15, the trustees (who are also the directors of the charitable company for the purposes of company law) are responsible for the preparation of the financial statements and for being satisfied that they give a true and fair view, and for such internal control as the trustees determine necessary to enable the preparation of financial statements that are free from material misstatement, whether due to fraud or error.

In preparing the financial statements, the trustees are responsible for assessing the charitable company's ability to continue as a going concern, disclosing, as applicable, matters related to going concern and using the going concern basis of accounting unless the trustees either intend to liquidate the charitable company or to cease operations, or have no realistic alternative but to do so.

Auditor's responsibilities for the audit of the financial statements

Our objectives are to obtain reasonable assurance about whether the financial statements as a whole are free from material misstatement, whether due to fraud or error, and to issue an auditor's report that includes our opinion. Reasonable assurance is a high level of assurance, but is not a guarantee that an audit conducted in accordance with ISAs (UK) will always detect a material misstatement when it exists. Misstatements can arise from fraud or error and are considered material if, individually or in the aggregate, they could reasonably be expected to influence the economic decisions of users taken on the basis of these financial statements.

Irregularities, including fraud, are instances of non-compliance with laws and regulations. We design procedures in line with our responsibilities, outlined above, to detect material misstatements in respect of irregularities, including fraud. The extent to which our procedures are capable of detecting irregularities, including fraud is detailed below:

- We identified the legal and regulatory frameworks that are applicable to the entity and determined that the most significant are those that relate to the specific business environment in which they operate, the reporting requirements they are obliged to adhere to and other legal and regulatory requirements applicable to operating entities in general.
These include the Companies Act 2006, the Charities Act 2011, FRS 102, the Charities SORP, GDPR and COVID-19 support schemes legislation. The charitable company operates locally and is not significantly impacted by international law or regulations.
Taxation law and regulations applicable to charities also apply to the charitable company but it is not involved in any complex matters that increase the risk of non-compliance.
Each area of audit review includes in the audit documentation reference to potential non-compliance and awareness of potential non-compliance is embedded in our audit procedures.
- We assessed the risks of material misstatement in respect of fraud by enquiry of management, review of the charity's operations and direct review of significant and material transactions, including all non-standard or irregular journal adjustments. Our understanding of the organisation enables us to understand and identify transactions or areas that appear to present a risk of fraud. None were detected.
Our pre-audit questionnaire specifically makes enquires about fraud and this is supported by audit documentation. We also review Board minutes to identify any matters of concern or risk. None was identified.
- The audit was conducted by a very experienced auditor who has a good knowledge of the client and no other assistance or support was required.
- The charity is small, its activities are regular and consistent and are not complex and no special audit considerations apply, nor is external specialist assistance required.

A further description of our responsibilities for the audit of the financial statements is located on the Financial Reporting Council's website at www.frc.org.uk/auditorsresponsibilities. This description forms part of our auditor's report.

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Independent Auditor's Report to the Members of Privacy International

Use of our report

This report is made solely to the charitable company's members as a body, in accordance with Chapter 3 of Part 16 of the Companies Act 2006. Our audit work has been undertaken so that we might state to the charitable company's members those matters we are required to state to them in an auditors report and for no other purpose. To the fullest extent permitted by law, we do not accept or assume responsibility to anyone other than the charitable company and the charitable company's members as a body, for our audit work, for this report, or for the opinions we have formed.



Anthony Armstrong FCA (Senior statutory auditor)
for and on behalf of Armstrong & Co, Statutory Auditor
Chartered Accountants & Statutory Auditor
Dated: 20 September 2021

4a Printing House Yard
Hackney Road
London E2 7PR

Privacy International

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Statement of Financial Activities

*incorporating the income and expenditure account
for the year ended 31 January 2021*

				2021	2020
		Unrestricted Funds	Restricted Funds	Total Funds	Total Funds
Notes	£	£	£	£	£
Income from:					
Donations and legacies	3	17,351	-	17,351	11,915
Charitable activities	4	950,875	1,010,390	1,961,265	4,189,401
Investments	5	1,126	-	1,126	1,362
Total income		969,352	1,010,390	1,979,742	4,202,678
Expenditure on:					
Charitable activities	6	978,231	870,395	1,848,626	1,958,772
Total expenditure		978,231	870,395	1,848,626	1,958,772
Net income/(expenditure) and movement in funds		(8,879)	139,995	131,116	2,243,906
Transfers between funds	18	12,840	(12,840)	-	
Reconciliation of funds:					
Total funds brought forward	12	3,676,053	401,720	4,077,773	1,833,867
Total funds carried forward	12	3,680,014	528,875	4,208,889	4,077,773

All incoming resources and resources expended are derived from continuing activities.

The statement of financial activities incorporates an income and expenditure account.

The accompanying accounting policies and notes form an integral part of these financial statements.

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Statement of Financial Position

as at 31 January 2021

	Notes	31 January 2021		31 January 2020	
		£	£	£	£
Fixed assets:					
Tangible assets	8		78,358		91,805
Total fixed assets			<u>78,358</u>		<u>91,805</u>
Current assets:					
Debtors	9	1,743,721		2,679,314	
Cash at bank and in hand	10	<u>2,456,703</u>		<u>1,403,800</u>	
Total current assets		<u>4,200,424</u>		<u>4,083,114</u>	
Creditors: amounts falling due within one year	11	<u>69,893</u>		<u>97,146</u>	
Net current assets/(liabilities)			4,130,531		3,985,968
Total net assets			<u>4,208,889</u>		<u>4,077,773</u>
The funds of the charity:					
Restricted income funds	16		528,875		401,720
Unrestricted funds	14		<u>3,680,014</u>		<u>3,676,053</u>
Total charity funds	20		<u>4,208,889</u>		<u>4,077,773</u>

These financial statements have been prepared in accordance with the special provisions of Part 15 of the Companies Act 2006 relating to small companies and with the Financial Reporting Standard 102.

The financial statements were approved by the Board of Trustees on 20 September 2021 and signed on its behalf by:


signature


name

Trustee

The notes on pages 22 to 30 form part of these accounts.

Privacy International

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Statement of Cash Flows

for the year ended 31 January 2021

	Notes	2021 £	2020 £
Cash flows from operating activities:			
Net cash provided by/(used in) operating activities	1	<u>1,074,201</u>	<u>(220,918)</u>
Cash flows from investing activities:			
Dividends, interest and rents from investments		1,126	1,362
Purchase of property, plant and equipment		(22,424)	(13,290)
Net cash provided by/(used in) investing activities		<u>(21,298)</u>	<u>(11,928)</u>
Change in cash and cash equivalents in the reporting period		1,052,903	(232,846)
Cash and cash equivalents at the beginning of the reporting period	2	<u>1,403,800</u>	<u>1,636,646</u>
Cash and cash equivalents at the end of the reporting period	2	<u>2,456,703</u>	<u>1,403,800</u>

Notes to the Cash Flow Statement

	2021 £	2020 £
1) Reconciliation of net income/(expenditure) to net cash flow from operating activities		
Net income/(expenditure) for the reporting period (as per the statement of financial activities)	131,116	2,243,906
Adjustments for:		
Depreciation charges	35,871	30,912
Dividends, interest and rents from investments	(1,126)	(1,362)
(Increase)/decrease in debtors	935,593	(2,477,737)
Increase/(decrease) in creditors	(27,253)	(16,636)
Net cash provided by/(used in) operating activities	<u>1,074,201</u>	<u>(220,918)</u>
2) Analysis of cash and cash equivalents		
Cash in hand	2,456,703	1,403,800
Total cash and cash equivalents	<u>2,456,703</u>	<u>1,403,800</u>

Privacy International

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Accounting Policies

for the year ended 31 January 2021

Basis of preparation

The financial statements have been prepared in accordance with:

- a) Applicable UK accounting standards, including Financial Reporting Standard 102 'The Financial Reporting Standard applicable in the UK and Republic of Ireland (FRS 102)'.
- b) Accounting and Reporting by Charities: Statement of Recommended Practice applicable to charities preparing their accounts in accordance with the Financial Reporting Standard applicable in the UK and Republic of Ireland (FRS 102) (effective 1 January 2015) - (Charities SORP FRS 102);
- c) the Companies Act 2006.
- d) the Charities Act 2011.

Public benefit entity

The charitable company meets the definition of a public benefit entity under FRS 102.

Going concern

The charity's income is mainly derived from non self-generated sources, such as grants, service level agreements and other governmental or NGO sources. The trustees consider that there are no material uncertainties about the likelihood that this support will continue, and accordingly, the accounts have been prepared on a going concern basis.

Income recognition

Income is recognised when the charity has a contractual or other right to its receipt, it is probable that the income will be received and that the amount can be measured reliably. Income with conditions attached to its receipt is recognised when those conditions have been fulfilled.

Interest on funds held on deposit is included when receivable and the amount can be measured reliably by the charity; this is normally upon notification of the interest paid or payable by the bank.

Expenditure recognition

Expenditure is accrued as soon as a liability is considered probable, and the amount of obligation can be measured reliably. The charity is not registered for VAT and accordingly expenditure includes VAT where appropriate.

Expenditure included in Raising Funds includes amounts incurred in obtaining grants and other donations.

Charitable expenditure includes those costs expended in fulfilling the charity's principal objects, as outlined in the Report of the Trustees. These include grants payable, governance costs and an apportionment of support costs.

- Grants payable are payments made to third parties in furtherance of the charity's objects. In the case of an unconditional grant offer this is accrued once the recipient has been notified of the grant award. The notification gives the recipient a reasonable expectation that they will receive the grant. Grants awards that are subject to the recipient fulfilling performance conditions are only accrued when the recipient has been notified of the grant and any remaining unfulfilled condition attaching to that grant is outside of the control of the charity.
- Governance costs comprise all costs involving the public accountability of the charity and its compliance with regulation and good practice. These costs include costs related to the independent examination and legal fees.
- Rentals under operating leases are charged as incurred over the term of the lease.

Costs are allocated directly to projects where they can be identified as relating solely to that project. Other costs are allocated between the funds based on staff time spent on the fund activities or other appropriate criteria.

Restricted Funds

Restricted funds are to be used for specified purposes as laid down by the funder. Direct and support expenditure which meets these criteria are identified to the fund together with a fair allocation of other costs.

Unrestricted Funds

Unrestricted funds are funds received which have no restrictions placed on their use and are available as general funds.

Designated Funds

Designated funds are unrestricted funds earmarked by the trustees for particular purposes.

Hire purchase and leasing commitments

Rentals paid under operating leases are charged to the Statement of Financial Activities on a straight line basis over the period of the lease.

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Accounting Policies

for the year ended 31 January 2021

Pensions

The charity operates defined contribution schemes which are administered by outside independent pensions providers. Contributions payable for the year are charged to the Statement of Financial Activities.

Tangible Fixed Assets

Tangible fixed assets are stated at cost less depreciation. Depreciation is provided at the following annual rates in order to write off each asset over its estimated useful life.

Software	- 33% on cost
Computer equipment	- 50% on cost
Furniture & fixtures	- 25% on cost

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Notes to the Accounts

for the year ended 31 January 2021

1 Incoming resources

The incoming resources and surplus are attributable to the principal activities of the charity.

2 Net incoming resources

Net incoming resources are stated after charging:

Statutory audit fees: Armstrong & Co - statutory audit services

Other audit fees: HW Fisher: project audit services

Depreciation - owned assets

	2021	2020
	£	£
Statutory audit fees: Armstrong & Co - statutory audit services	3,600	3,600
Other audit fees: HW Fisher: project audit services	9,780	9,360
Depreciation - owned assets	35,871	30,912

Trustees' emoluments

	-	-
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Emoluments include salaries, fees, bonuses, expense allowances and estimated non-cash benefits receivable. All trustees serve in a voluntary capacity and do not receive payment for their services.

APB Ethical Standard - Provisions available for small entities

In common with many other charities of our size and nature we use our auditors to assist with the preparation of the financial statements and to provide advice relating to statutory and regulatory compliance.

3 Income from donations and legacies

Donations

	Unrestricted	Restricted	2021 Total	2020 Total
	£	£	£	£
Donations	17,351	-	17,351	11,915
	<u>17,351</u>	<u>-</u>	<u>17,351</u>	<u>11,915</u>

4 Income from charitable activities

Grants

Other income

	Unrestricted	Restricted	2021 Total	2020 Total
	£	£	£	£
Grants	947,676	1,010,390	1,958,066	4,172,270
Other income	3,199	-	3,199	17,131
	<u>950,875</u>	<u>1,010,390</u>	<u>1,961,265</u>	<u>4,189,401</u>

5 Income from investments

Interest received

	Unrestricted	Restricted	2021 Total	2020 Total
	£	£	£	£
Interest received	1,126	-	1,126	1,362
	<u>1,126</u>	<u>-</u>	<u>1,126</u>	<u>1,362</u>

Privacy International

(A Charity Company Limited by Guarantee, company number 4354366)

Notes to the Accounts for the year ended 31 January 2021

6 Expenditure on charitable activities	Unrestricted	Restricted	2021	2020
	£	£	Total £	Total £
Staff salaries	600,947	373,050	973,997	925,683
Staff social security	62,263	40,813	103,076	97,511
Pension costs	38,620	25,285	63,905	57,097
Other staff costs	6,256	-	6,256	7,875
Staff training	3,105	-	3,105	26,747
Recruitment	4,748	-	4,748	5,441
Project expenses	40,212	342,791	383,003	440,003
Translation costs	3,774	3,714	7,488	6,479
Travel & accommodation	1,061	5,034	6,095	79,869
Office expenses	86,322	10,917	97,239	102,072
Fundraising costs	272	-	272	9,233
Rent	52,124	33,222	85,346	85,202
Depreciation	35,871	-	35,871	30,913
(Gains)/losses on foreign exchange	(8,747)	-	(8,747)	15,726
Legal & professional fees	10,393	1,531	11,924	11,515
Consultancy	27,745	22,756	50,501	39,649
Bank & paypal charges	866	1,502	2,368	2,373
Governance - Board costs	13	-	13	13
Trustee expenses	8,181	-	8,181	1,859
Audit fees	3,600	9,780	13,380	12,960
Accountancy costs	605	-	605	552
	<u>978,231</u>	<u>870,395</u>	<u>1,848,626</u>	<u>1,958,772</u>

7 Staff costs	2021	2020
	£	£
Staff salaries	973,997	925,683
Staff social security	103,076	97,511
Staff pensions	63,905	57,097
	<u>1,140,978</u>	<u>1,080,291</u>

Average number of employees during the year was:

2021	2020
<u>25</u>	<u>23</u>

Employees paid in excess of £60,000 during the current year and previous year:

2021	2020
<u>1</u>	<u>1</u>

The number of employees whose total employee benefits (excluding employer pension costs) fell within each band of £10,000 from £60,000 upwards were as follows:

Band	No of employees	
	2021	2020
£60,000 to £69,999	-	-
£70,000 to £79,999	-	1
£80,000 to £89,999	1	-

The charity considers its key management personnel to be the trustees and the executive director. The total employment benefits (including employer pension contributions) of the key management personnel were £87,740 (2020: £81,764).

No remuneration was paid to any trustee or their associates for services as a trustee during the year ended 31 January 2021 nor to 31 January 2020.

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Notes to the Accounts for the year ended 31 January 2021

8 Tangible fixed assets

	Leasehold improvements £	Software £	Computer equipment £	Furniture & fixtures £	Total £
Cost					
As at 1 February 2020	103,055	3,645	39,767	18,093	164,560
Additions	4,260	-	14,984	3,180	22,424
As at 31 January 2021	<u>107,315</u>	<u>3,645</u>	<u>54,751</u>	<u>21,273</u>	<u>186,984</u>
Depreciation					
As at 1 February 2020	23,236	3,645	32,980	12,894	72,755
Charge for the year	21,440	-	11,190	3,241	35,871
As at 31 January 2021	<u>44,676</u>	<u>3,645</u>	<u>44,170</u>	<u>16,135</u>	<u>108,626</u>
Net book value					
As at 31 January 2021	<u>62,639</u>	<u>-</u>	<u>10,581</u>	<u>5,138</u>	<u>78,358</u>
As at 31 January 2020	<u>79,819</u>	<u>-</u>	<u>6,787</u>	<u>5,199</u>	<u>91,805</u>

9 Debtors: amounts falling due within one year

	2021 £	2020 £
Rent deposit	15,478	15,478
Prepayments	45,803	19,497
Accrued income	1,682,440	2,644,339
	<u>1,743,721</u>	<u>2,679,314</u>

Accrued income above includes 4 multi year grants receivable towards core/support costs of the charity which are receivable over next 2 years. These grants have been recognised as income and accounted accordingly for under the income recognition criteria of FRS102.

10 Bank and cash in hand

	2021 £	2020 £
Barclays current bank account	2,431,738	991,369
Barclays current bank account 2	10,969	4,343
Barclays Treasury deposit bank account	-	400,000
Paypal account	12,413	7,331
Travel currency cards	1,573	757
GiveAll Platform	10	-
	<u>2,456,703</u>	<u>1,403,800</u>

11 Creditors: amounts falling due within one year

	2021 £	2020 £
Trade creditors	4,339	18,352
Credit cards	(3,772)	2,776
Payroll taxes	27,109	25,217
Accruals	42,217	50,801
	<u>69,893</u>	<u>97,146</u>

Privacy International

(A Charity Company Limited by Guarantee, company number 4354366)

Notes to the Accounts for the year ended 31 January 2021

12 The funds of the charity: current year	Opening balance £	Resources arising £	Resources utilised £	Other movements £	Closing balance £
<i>Restricted funds</i>					
Restricted income funds	401,720	1,010,390	(870,395)	(12,840)	528,875
<i>Unrestricted funds</i>					
Designated funds	91,805	-	-	(13,447)	78,358
General funds	3,584,248	969,352	(978,231)	26,287	3,601,656
<i>Total unrestricted funds</i>	3,676,053	969,352	(978,231)	12,840	3,680,014
	4,077,773	1,979,742	(1,848,626)	-	4,208,889

13 The funds of the charity: prior year	Opening balance £	Resources arising £	Resources utilised £	Other movements £	Closing balance £
<i>Restricted funds</i>					
Restricted income funds	444,352	1,136,286	(1,179,732)	814	401,720
<i>Unrestricted funds</i>					
Designated funds	109,427	-	-	(17,622)	91,805
General funds	1,280,088	3,066,393	(779,041)	16,808	3,584,248
<i>Total unrestricted funds</i>	1,389,515	3,066,393	(779,041)	(814)	3,676,053
	1,833,867	4,202,679	(1,958,773)	-	4,077,773

14 Designated funds: current year	Opening balance £	Resources arising £	Resources utilised £	Transfers & adjustments £	Closing balance £
Fixed assets fund	91,805	-	-	(13,447)	78,358
	91,805	-	-	(13,447)	78,358

15 Designated funds: prior year	Opening balance £	Resources arising £	Resources utilised £	Transfers & adjustments £	Closing balance £
Fixed assets fund	109,427	-	-	(17,622)	91,805
	109,427	-	-	(17,622)	91,805

Fixed assets fund	This fund represents the amount of charity funds locked up in fixed assets which are needed for operational purposes. The funds are carried at the net book value of the fixed assets at the balance sheet date, after deducting any outstanding loans, endowment funds or restricted funds used to finance their acquisition.
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16 Restricted funds: current period	Opening balance £	Incoming resources £	Resources expended £	Transfers & gains/(losses) £	Closing balance £
Adessium Foundation	13,086	-	-	(13,086)	-
Ford Foundation	-	418,563	25,687	-	392,876
Foundation to Promote Open Society	103,686	101,419	195,531	-	9,574
IDRC	33,172	59,151	92,323	-	-
Luminate	49,596	-	4,180	-	45,416
Paul Hamlyn Foundation	55,150	-	55,396	246	-
The Swedish International Development Cooperation Agency	147,028	431,259	497,279	-	81,008
	401,720	1,010,390	870,395	(12,840)	528,875

Privacy International

(A Charity Company Limited by Guarantee, company number 4354366)

Notes to the Accounts

for the year ended 31 January 2021

	Opening balance	Incoming resources	Resources expended	Transfers & gains/(losses)	Closing balance
	£	£	£	£	£
17 Restricted funds: prior period					
Adessium Foundation	65,329	-	52,243	-	13,086
Digital Freedom Fund	-	4,367	4,649	282	-
Ford Foundation	65,868	-	65,868	-	-
Foundation to Promote Open Society	139,149	204,296	239,759	-	103,686
IDRC	-	149,179	116,007	-	33,172
Luminate	-	75,844	26,248	-	49,596
Mozilla Foundation – Open Web Fellow Programme	-	16,579	16,579	-	-
OAK Foundation	5,051	101,569	107,151	531	-
Paul Hamlyn Foundation	-	60,000	4,850	-	55,150
The Swedish International Development Cooperation Agency	168,953	524,452	546,377	-	147,028
	<u>444,352</u>	<u>1,136,286</u>	<u>1,179,732</u>	<u>814</u>	<u>401,720</u>

Restricted funds (continued)

Projects financed by restricted funds are supported by unrestricted funding where necessary. This occurs where the funding is in arrears or the incidence of expenditure on the project occurs disproportionately at the beginning of the project compared to the income flows. Where restricted projects end the year with a deficit, this is met by after year-end restricted income or transfers from unrestricted funds.

Adessium Foundation	The Adessium Foundation supports various programmes to help build a society in which people live in harmony with each other and their environment and promote social justice and cohesion and since 2017 supported PI on the early work on Data Exploitation.
Ford Foundation	The Ford Foundation is a globally oriented private foundation with the mission of advancing human welfare. In 2019 and 2020 Privacy International received grants to support civil society in the Global South to advocate and litigate against unfair surveillance in response to COVID-19 and to build institutional strength of PI.
Foundation to Promote Open Society	The Open Society Foundations work to build vibrant and tolerant democracies whose governments are accountable to their citizens. The Foundations seek to shape public policies that assure greater fairness in political, legal, and economic systems and safeguard fundamental rights. In 2018 Privacy International received 2-year grant to work with other civil society actors to challenge the drivers of digital identity systems and advocate for protection of rights.
IDRC	The International Development Research Centre (IDRC) is a Canadian Crown corporation helping developing countries find solutions to social, economic and environment problems. Received in 2019, the grant from the IDRC supports a project to explore intersection of gender and privacy issues in the Global South.
Luminate	Established in 2018, Luminate is a global philanthropic organisation with the goal of empowering people and institutions to work together to build just and fair societies, delivering impact in four connected areas that underpin strong societies: Civic Empowerment, Data & Digital Rights, Financial Transparency, and Independent Media. Since 2013 the Omidyar Network and since 2019 Luminate (an offshoot of the Omidyar Network), have been supporting Privacy International in building organisational capacity to become more resilient and strong leader within civil society.
Paul Hamlyn Foundation	Paul Hamlyn Foundation's mission is to help people overcome disadvantage and lack of opportunity, so that they can realise their potential and enjoy fulfilling and creative lives. In 2019 PI received a grant to look into invasive data exploitation practices in immigration processes as part of the Foundation's Shared Ground Fund.
The Swedish International Development Cooperation Agency	The Swedish International Development Agency is supporting PI in our collaboration with civil society actors in countries across east Africa, south and south-east Asia and South America. The 4-year project, which started in 2017 aims to strengthen civil society's capacity to protect the right to privacy, while confronting data-driven transformations in power.

Privacy International

(A Charity Company Limited by Guarantee, company number 4354366)

Notes to the Accounts

for the year ended 31 January 2021

	General funds	Designated funds	Restricted funds	Endowment funds	Total
18 Transfers between funds: current period					
General to restricted	(246)	-	246	-	-
General to designated	13,447	(13,447)	-	-	-
Restricted to general	13,086	-	(13,086)	-	-
	<u>26,287</u>	<u>(13,447)</u>	<u>(12,840)</u>	<u>-</u>	<u>-</u>
19 Transfers between funds: prior period					
General to restricted	(814)	-	814	-	-
General to designated	17,622	(17,622)	-	-	-
	<u>16,808</u>	<u>(17,622)</u>	<u>814</u>	<u>-</u>	<u>-</u>
20 Net assets attributable to funds: current period					
	General funds	Designated funds	Restricted funds	Endowment funds	Total
		£	£	£	£
Tangible fixed assets	-	78,358	-	-	78,358
Current assets	3,671,549	-	528,875	-	4,200,424
Current liabilities	(69,893)	-	-	-	(69,893)
Net assets represented by funds	<u>3,601,656</u>	<u>78,358</u>	<u>528,875</u>	<u>-</u>	<u>4,208,889</u>
21 Net assets attributable to funds: prior period					
	General funds	Designated funds	Restricted funds	Endowment funds	Total
		£	£	£	£
Tangible fixed assets	-	91,805	-	-	91,805
Current assets	3,681,394	-	401,720	-	4,083,114
Current liabilities	(97,146)	-	-	-	(97,146)
Net assets represented by funds	<u>3,584,248</u>	<u>91,805</u>	<u>401,720</u>	<u>-</u>	<u>4,077,773</u>

22 Taxation

The company is a registered charity. Accordingly, it is exempt from taxation in respect of income and capital gains to the extent that these are applied to its charitable objects.

23 Post balance sheet events

There were no significant post balance sheet events.

24 Pension commitments

The charitable company contributes to employee defined contribution (DC) stakeholder pension schemes. The assets of the schemes are held separately from those of the charitable company in independently administered funds.

25 Other financial commitments

Total operating lease commitments

At 31 January 2021, the charity had total commitments under non-cancellable operating leases as detailed below:

	2021	2020
	£	£
Office premises	<u>229,625</u>	<u>313,125</u>
	<u>229,625</u>	<u>313,125</u>

26 Contingent liabilities

The charitable company had no material contingent liabilities at 31 January 2021 nor at 31 January 2020.

27 Related parties

There were no disclosable related party transactions during the year.

Privacy International

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Notes to the Accounts

for the year ended 31 January 2021

28 Transactions with trustees

During the year the charity paid travel expenses of Benjamin Wizner, (a trustee) totalling £Nil (2020: £1,057).

During the year the charity paid travel expenses of Holly Marie Ruthrauff, (a trustee) totalling £381 (2020: £802).

29 Gifts in kind and volunteers

During the year the charitable company benefited from unpaid work performed by volunteers.

30 Company status

The company is limited by guarantee and has no share capital. The guarantors liability in the event the company is wound up is restricted to a maximum of £1 each.