

PRIVACY INTERNATIONAL

England & Wales · Charity number 1147471

Details

Other names	PI
Status	Registered
Legal form	Charitable company
Company number	04354366
Registered	2012-05-28
Register	View on the Charity Commission register

Contact

Address	Privacy International 62 Britton Street London EC1M 5UY
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Website	www.privacyinternational.org

Activities

Objects: TO PROMOTE THE HUMAN RIGHT OF PRIVACY (AS SET OUT IN THE UNIVERSAL DECLARATION OF HUMAN RIGHTS AND SUBSEQUENT UNITED NATIONS CONVENTIONS AND DECLARATIONS) 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 TOWARD 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;

Activities: We promote the human right of privacy throughout the world, specifically:- raise awareness of threats to privacy;- monitor and report on surveillance methods and tactics;- work at national and international levels toward the provision of privacy protections;- monitor measures to protect privacy, and to seek ways through information technology to protect personal information

Classification

- **How:** Makes Grants To Organisations, Provides Advocacy/advice/information, Sponsors Or Undertakes Research
- **What:** Human Rights/religious Or Racial Harmony/equality Or Diversity
- **Who:** The General Public/mankind

Geography

- Argentina
- Brazil
- Chile
- Colombia
- India
- Indonesia
- Jordan
- Kenya
- Lebanon
- Mexico
- Pakistan
- Paraguay
- Philippines
- South Africa
- Thailand
- Uganda
- Throughout England And Wales

Finances

Period end	Income	Expenditure	Assets	Employees
2025-01-31	£2,421,096	£2,118,851	£3,640,340	25
2024-01-31	£2,594,514	£2,072,470	£3,338,095	25
2023-01-31	£2,015,752	£2,101,045	£2,816,050	25
2022-01-31	£2,277,715	£1,903,778	£2,901,343	26
2021-01-31	£1,979,742	£1,848,626	£4,208,889	25

Trustees

Name	Role	Appointed
AMANDA BORTON		2021-02-01
Ahana Datta		2021-02-01
Joshua Castellino		2021-02-01
Mahdis Keshavarz		2024-05-01
Martin Gerhard Georgi		2024-05-01
Martin Scheinin		2025-05-01
Sara Rebeca Aguilar Fratty		2025-05-01
Vera Franz		2025-05-01

PRIVACY INTERNATIONAL

England & Wales - Charity number 1147471

Accounts

Company number: 4354366

Charity number: 1147471

Privacy International

Report and financial statements

For the year ended 31 January 2025

Privacy International

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For the year ended 31 January 2025

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Privacy International

Reference and administrative information

For the year ended 31 January 2025

Company number 4354366

Country of incorporation United Kingdom

Charity number 1147471

Country of registration England & Wales

Registered office and operational address 62 Britton Street, London, EC1M 5UY

Trustees Trustees, who are also directors under company law, who served during the year and up to the date of this report were as follows:

Holly Marie Ruthrauff	Resigned 31 December 2024
Stephen Josef Tibbett	Resigned 31 October 2024
Antonio Michaelides	Resigned 28 February 2025
Ahana Datta	
Joshua Castellino	
Amanda Borton	
Mahdis Keshavarz	
Martin Georgi	
Sara Fratti	Appointed 01 May 2025
Vera Franz	Appointed 01 May 2025
Martin Scheinin	Appointed 01 May 2025

Bankers Barclays Bank
1 Churchill Place
London E14 5HP

Solicitors Covington & Burling
22 Bishopsgate
London EC2N 4BQ

Auditor Sayer Vincent LLP
Chartered Accountants and Statutory Auditor
110 Golden Lane
LONDON
EC1Y 0TG

The trustees present their report and the audited financial statements for the year ended 31 January 2025.

Reference and administrative information set out on page 1 forms part of this report. The financial statements comply with current statutory requirements, the memorandum and articles of association, the requirements of a directors' report as required under company law, and the Statement of Recommended Practice - Accounting and Reporting by Charities: SORP applicable to charities preparing their accounts in accordance with FRS 102.

Objectives and activities

Purposes and aims

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. 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.

Governance of Privacy International's activities

Privacy International's trustees continuously review the aims, objectives and activities of the charity.

Privacy International (PI) sets multi-year strategies that the Trustees expect the organisation to deliver upon. Through annual planning of projects that contribute towards multi-year outcomes, the Trustees monitor PI's delivery of its strategic priorities.

PI's strategy for 2023-2026 and the strategic plan were approved by the Board of Trustees in 2022.

Every December PI establishes an annual plan that prescribes how we will organise our work to achieve change. By March every year we establish indicators for monitoring whether we are achieving results in accordance with our Monitoring & Evaluation framework. These indicators are reviewed at every Trustee meeting, alongside the organisation's risk matrix.

In setting the 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.

Beneficiaries of our services

Changes in practices and policies by governments and companies as a result of our work have benefited people globally, including as national publics and consumers. 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.

Achievements and performance

The charity's charitable activities focus on achieving change by strategically targeting our tech, legal and policy advocacy at governments and companies who are vying for power to determine the future to their advantage and to the detriment of people's privacy. We track results on an annual basis; knowing that impact often takes longer.

Impacts in 2024

The impacts we contributed to that arose in 2024 can be grouped around i) enhancing protections for people, ii) raising the bar against exploitation, and iii) establishing stronger standards.

The work contributing to these effects have built up over years (and we outline such work conducted in 2024 in the section on 'tactics').

i. Enhancing protections for people

We want people to have better access to their rights, through increased protections.

Impact case study: improved protections for migrants subjected to GPS tagging

The UK Government had been punitively tagging migrants with GPS ankle bracelets. Members of the migrant community wanted us to prioritise this issue. We tested the kit. We filed evidence in court cases and regulatory complaints.

In March 2024, two courts handed down rulings on the UK's GPS tagging of migrants, dealing blows to the legality of the policy. In March 2024 UK data protection regulator also issued a decision, following from our complaint in 2022.

Now, the UK Government is forced to review and change these humiliating and invasive practices.

As other governments deploy similar 'solutions', we will share our analyses and advocacy experiences with others.

ii. Raising the bar against exploitation

We want governments and companies to struggle to deploy disproportionate surveillance and data exploitative practices.

Impact case study: curtailed industry consolidation

In 2024, Amazon and iRobot terminated their merger. That came after the European Commission's objected to the merger and began an investigation. PI was granted 'third person interest' status in the EU's review of the merger, following our submissions and our research.

This result shows Big Tech's power can be constrained.

Legal results: informed jurisprudence

Russia's law for accessing encrypted communications violates human rights, according to the European Court of Human Rights. In the February 2024 [judgement in the case of Podchasov v. Russia](#), the Court ruled that forcing the retention of data on internet users and requiring decrypted communications cannot be regarded as necessary in a democratic society. [PI's intervention in the case](#) provided a technical and legal analysis of encryption and its key role in the protection of human rights, and the court cited our submission.

Colombia is held accountable for violating the right to defend human rights including unlawful surveillance, by the Inter-American Court of Human Rights. The Court's historic [judgment](#) is the first acknowledgment within the inter-American context of a state's international responsibility for violating the right of people to defend human rights. The Court decision reflected the positions presented in our [intervention](#), alongside other organisations, represented by the International Human Rights Law Clinic at the University of California, Berkeley.

Mass secret surveillance in Poland is condemned by the European Court of Human Rights. In the Pietrzak and others v Poland case, to which [we intervened](#) four years prior with Article 19 and EFF, the [judgment](#) found that Poland's mass secret surveillance powers indeed violated the right to privacy and was not "necessary in a democratic society".

These judgments about specific laws and cases articulate the need for reform of laws and practices. They also set precedents for other countries operating in similar fashions.

iii. Establishing stronger standards

PI seeks to set positive standards that protect privacy. By informing standards we aim to improve practice globally.

Impact case study: new protection requirements for people's devices and services

European Union laws will require companies who manufacture devices and run services to provide security updates, handle vulnerabilities, and be transparent with consumers. This will increase security for hundreds of millions of people; while providing *de facto* global effects.

In March 2024 the European Parliament [approved](#) the Cyber Resilience Act. PI [engaged extensively in this policy process](#). The final text obliges manufacturers to ensure "effective handling of vulnerabilities" for "no less than five years".

In January 2024 the European Parliament adopted the Directive on empowering consumers for the green transition. As a result of our advocacy [the Directive reflects our demands](#), including that consumers will have information about the minimum period during which devices should receive security updates, accessible through a harmonised label.

Tactics in 2024

Our tactics and methods preparing the ground for change. While some results can be seen already, we hope more will come soon.

This reporting is grouped around 1) identifying threats, 2) exposing harms and abuses, 3) advocating for change, and 4) mobilising and amplifying others.

1. Identifying threats

At PI we are always looking across the world and to the future to identify the next generation of challenges.

By undertaking horizon scanning and engaging with media outlets we can identify new threats and inform public discourses around arising challenges.

Militarisation of Tech

As a result of our horizon scanning exercises, we were able to further develop, gain funding, and launch a new project on Militarisation of Tech. In 2024 we established a multi-year fund for the sector to explore and prepare for the increased 'militarisation of tech'. We are now building a programme of work with \$1.5m USD of funding for PI and a cluster of partners. The strategic objective is: *War and conflict must not become the dominant determinant of our societies' technologies.*

In 2022 with the invasion of Ukraine and then in 2023 with the war in Gaza, we noticed a remarkable shift in the development and use of technology. Industry began shifting in many ways, including the rise of the 'defence tech' industry, the shift of the 'defence industry' towards advanced forms of tech that included data collection and surveillance, and by 2024 Big Tech began announcing formal moves to seek military contracts, including using AI.

Through developing knowledge bases around militarisation of tech and building a systemic understanding, PI will develop an initial body of evidence and compelling narratives to engage with media, civil society and other stakeholders, which will serve as a basis for future advocacy.

We are resourcing and working with arms control organisations, domain experts and researchers, investigators and journalists; as well as PI partner organisations who identified this issue as one of their priorities.

Media coverage

PI's positions and demands have been extensively covered by various national and international media outlets. We registered 272 media materials in 28 languages covering various aspects of our work.

Among others our work has been covered by: Al Jazeera, BBC, Daily Mail, Euronews, Financial Times, The Guardian, The Independent, Nature, Netzpolitik, TechCrunch, Washington Post, WIRED, The Telegraph, The Times, Tom's Guide.

Among the most frequently covered topics were: Facial Recognition Technology, AI Tools and models, GPS tagging migrants, Automated Decision Making, Encryption, Surveillance Programs.

Orienting other fields

By engaging with other actors, we can bring our perspectives and focus to their attention.

PI's work identifying the impact of abusive use of technology on various affected populations has been recognised by international organisations. PI has been invited to take part in various consultations and deliver expert sessions, including:

- Delivering an oral intervention at the Plenary Session of the UN's Committee on the Convention of the Rights of Persons with Disabilities during its 31st Session, in August 2024.
- Conducting a workshop with the International Labour Organization (ILO), to raise awareness and improve understanding amongst key stakeholders and policy experts in the UN framework and adjacent organisations regarding the impact of digital technologies on minority groups in the context of social protection.
- Together with the ILO, UN Office of the High Commissioner for Human Rights (OHCHR), and UNICEF, co-organising and co-delivering a workshop during which we were able to articulate our concerns, including some case studies and the legal and data protection framework, concerning digitisation of social protection and rights of persons with disabilities. Over 170 people registered for this event. The audience was largely UN officials, policymakers and some civil society representatives.

2. Exposing Harms and Abuses

Through research, investigations and policy engagement we bring evidence to stakeholders, including communities, civil society, and key institutions. Instances over the last year include:

- We presented our work exposing the UK Government's automated system for processing migrants data to the Immigration Lawyer Practitioner's Association working group on digitalisation.
- We raised the risks of surveillance of students and education staff to the attention of the UN Special Rapporteur on the right to education, who included these points in her 2024 reports on the right to academic freedom and on AI.
- With our partner in Colombia, Karisma, we raised the automatic exclusion of people receiving social assistance to the attention of the UN Special Rapporteur on extreme poverty and human rights, in advance of his country visit, an issue that he then highlighted.
- At their invitation, we raised concerns to UN processes around the rights of persons with disabilities, resulting in a report critical of the UK Government, and an invitation for future collaboration with the UN Special Rapporteur on the rights of persons with disabilities.

We also continued to explore and expose effects of technological systems on migrants, indigenous communities and other vulnerable groups. For instance, in our report on privacy of indigenous communities, we present our research findings and the analyses of interviews with organisations that work directly with indigenous people, and we outline the main interrelationships between privacy, autonomy, and other Indigenous rights.

When we expose harms to stakeholders, we lay the groundwork for further action. We hope to work with them to create results and impact in years to come.

3. Advocating for change

In 2024 we registered 21 instances of global and regional structures, or their members, adopting PI's positions in their communication, initiatives, reports or decisions. These are a result of developing positions and standards that protect privacy, engaging with key policy bodies, and participating in consultation processes. Instances of these activities and results include:

Enhancing safeguards.

- The Council of Europe data protection committee adopted [guidelines on voter registration and authentication](#). The Guidelines include positions that PI recommended to the Committee, following years of work on election privacy. It will serve as a reference point for organisation and management of the election process in countries across the world.
- On invitation from OSCE's Office for Democratic Institutions and Human Rights, we attended Declaration of Principles 2024 meeting in Gdansk. PI was the only non-election observer organisation invited to the event. We also followed-up on the DoP data and election policy paper, which is due to be adopted in 2025.

Improvements to draft laws.

- Improvements to surveillance draft legislation in South Africa. Following a [joint public statement](#), with other organisations, and comments to Parliament, on the draft General Intelligence Laws Amendment Bill 2023 (GILAB), the National Assembly adopted the third version of GILAB incorporating many of our suggestions. This included the removal of the provision allowing security vetting of non-profit organisations, churches, and

their personnel; and improved its regulation of mass interception with stricter controls on data management and protections. The Bill, now before the National Council of Provinces for consideration, still has shortcomings that need to be addressed.

- Nigerian draft law expands to consider the role of private surveillance services. Following our meeting with the Nigerian Security and Civic Defence Corps (NSCDC) Law Reform Committee, where we provided training on the need to regulate and oversee the private surveillance services provided by private security companies, the Committee introduced into the new draft of the Nigeria Private Security Industry Bill 2024 new powers to regulate and oversee private surveillance.

Strengthening guidance on innovations.

- The UK [Information Commissioner's Office response to the consultation series on generative AI](#) improved on their prior statements; and the adjustments reflect our submissions.
- In December 2024, the European Data Protection Board (EDPB) adopted an [opinion on AI models](#), and contains alignments with [our submission](#), for instance, around stronger remedies.

Informing emerging global standards.

- The UN Special Rapporteur on Terrorism echoed our concerns for the need for stronger effective regulation on surveillance technologies, including Facial Recognition Technologies and spyware, need for due diligence of state and private companies use of these technologies.
- Following our submission to the Office of the United Nations High Commissioner for Human Rights, their "Strengthening Human Rights in Counter-Terrorism Strategy and Policy" toolkit contains a separate section on the right to privacy with direct reflections of the content from our submission.
- The report of the UN Secretary General on human rights in the administration of justice references our research positions that digital surveillance is increasingly leading to activists and protesters being subjected to criminal sanctions and proceedings. The report recommendations mirror several of our briefing points including around the right to fair trial.
- The World Health Organization's technical brief [on AI in sexual and reproductive health](#) incorporated our comments and referenced our input.
- The UN Special Rapporteur on racism's report on AI and racial discrimination referenced our demands around AI-enabled medical devices, data problems, and disease detection; and facial recognition technology impacts on racialised and marginalised communities, and in educational institutions.
- The UN resolution on the right to privacy in the digital age includes some of our demands (with Article 19) but is incomplete. The adopted resolution contains new language on AI and on data protection. It does not, however, include our suggestions on Social Media Intelligence.

4. Mobilising and amplifying others

PI has a deep sense of responsibility for the field. We remember when the field was non-existent, under-funded, and struggling to be heard. We want a capable and sustainable sector. PI convenes a network of organisations from across the world, primarily in eastern Africa, Latin America, and South and South-east Asia.

Below are examples of results arising from our financial support to partners.

Valued voices and contributors

- ICJ Kenya gauged awareness of government officials, journalists, and lawyers regarding WorldCoin through a series of workshops and presenting at the Annual Jurists Conference in India, attended by leading judges and legal practitioners.
- La Red en Defensa de los Derechos Digitales (R3D) in Mexico crafted resources around data and elections. Their “Censura Electoral” website has been intensively used by media and academics and praised by the sector.
- Transparencia Electoral improved privacy knowledge of Election Management Bodies and international and domestic election monitors through their Program on the [NDI's OpenEDx platform](#). Their [index](#) and legal analyses on the protection of personal data with particular emphasis on the electoral contexts of 16 countries, informed conversations across the sector.
- Karisma developed a comprehensive database of open-source intelligence technology providers in Colombia, informing research by civil society, academia and journalists. Also our joint work with Karisma resulted in the UN Special Rapporteur on extreme poverty and human rights [highlighting](#) a government's social registration programme's impact on poverty and inequality.

Identifying essential change

- Centre for Internet & Society in India, in consultation with others, developed advocacy points around better regulation of health data in India. Their analysis of mental health apps used in India identified existing apps security vulnerabilities and unauthorised data sharing with third parties.
- Following input from Data Privacy Brazil, the Brazilian Superior Electoral Court (TSE)'s [Resolution on electoral propaganda](#) adopted additional safeguards around transparency requirements for campaigns, candidates and political parties. They also developed an influential [report](#) presenting their research findings about AI in the Brazilian Elections.
- Digital Rights Foundation provided input into Pakistan's Personal Data Protection Bill (through submission and direct engagement with Ministry of IT and Telecom and other stakeholders). They also actively informed the broader public about the bill and data protection rights, as part of their #PrivacyIsARight campaign. They also [exposed](#) technology-based abuses in Elections, providing some meaningful recommendations.
- InternetLab, based on their research, developed an analytical framework to address the intersection of education and technology in Brazil. They also attracted broader attention on automated decision-making within the CadÚnico system, through their report and its active involvement in various national and international fora.
- Haki Na Sheria took forward their litigation on Maisha Namba, Kenya's national registration system. We joined the NIIMS coalition to keep updated with advocacy efforts in Kenya.

Strengthened organisations

- With our support, the [Privacy.PH](#) Collective has been established to promote the privacy agenda in Philippines. So far the collective raised public awareness on visual surveillance technologies and organised a national [forum](#) on AI in Philippine elections.
- Zamleh in Israel-Palestine rebuilt their human resources system and developed a Monitoring & Evaluation system, moving from project-based to an organisation-level framework.

It is worth mentioning that partner organisations relied on PI's materials and positions in planning and delivering of their work. As examples, Transparencia Electoral's index is based on PI's elections checklist; Karisma's engagement with the UN Special Rapporteur was planned and crafted with our support.

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 increased to £2.12m (2023/2024: £2.07m) mostly as a result of changes to staff costs, and bringing the organisation's work with overseas allies to pre-pandemic levels.

The incoming resources for the year were £2.42m (2023/2024: £2.59m) – the income in 2024/2025 reflects multi-year grant agreements in support of the organisational strategy (2023-2026) and new project support grants, received in second half of 2024.

The total funds of the charity at the end of the year were £3.64m. This included £1.3m in project and other restricted funds and £2.34m in unrestricted funds. The trustees have set aside £1.52m as Strategic fund 2026 of unrestricted funds as designated funds for delivery of the strategic objectives, projects and activities. The Trustees expect these designated funds to be fully utilised by the end of the strategic plan (2026). There is also £29k of designated fixed assets funds. The remaining £791k are general funds held for operational working capital requirements to address financial risks surrounding income and expenditure in line with the reserves policy set out below.

Reserves policy and going concern

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 unrestricted and undesignated reserves equivalent to 6 months' running costs – resulting in a target of £840k (currently: £792k, constituting 5.1 months of operational costs, representing the amount of general reserves not designated or otherwise committed to activity expenditure in 2025-2026).

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.

After making appropriate enquiries, the Trustees have a reasonable expectation that the company has adequate resources to continue in operational existence for the foreseeable future. For this reason, they continue to adopt the going concern basis in preparing the financial statements.

Fundraising

PI is working hard to ensure that our work is independent, cutting-edge and can be sustained for years to come. As a result, PI is funded by a variety of different sources. We do not accept funding from corporations because we believe that it would jeopardise the independence of our activities.

Main sources of funding for PI are multi-year grants (core support and project support alike) from a small number of big institutional donors. Public donations remain around 1% of overall annual income, which we continue to work to change with the goal of diversifying the funding to move away from high dependency on limited number of donors.

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

Ford Foundation

Privacy International

Trustees' annual report

For the year ended 31 January 2025

Luminate
Oak Foundation
Open Society Foundations
Paul Hamlyn Foundation
Swedish International Development Cooperation Agency
GNP+.

Volunteers and pro bono support

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, Matrix Chambers, Doughty Street Chambers, Bhatt Murphy, Leigh Day, Deighton Pierce Glynn, Duncan Lewis, Covington & Burling LLP, independent counsel, and various university departments, law clinics and legal experts including at the Harvard Law School Cyberlaw Clinic and the University of Law Human Rights and Technology Research Clinic.

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.

Plans for the future

In 2025 we will continue our Strategic Interventions in each of our four 'Strategic Area' programmes. Additionally, we have set objectives around expanding our skills and capacities, deepening our expertise within core functions, and exploring more resilient operations.

Structure, governance and management

The organisation is a charitable company limited by guarantee, incorporated on 16 January 2002 and registered as a charity on 26 May 2012.

The company was established under a memorandum of association which established the objects and powers of the charitable company and is governed under its articles of association.

Privacy International's governing body is the Board of Trustees, which meets up to four times a year. The primary responsibility of the Board is to provide strategic leadership, set overall policy, regularly evaluate the charity's performance and risk management, and ensure compliance with UK law. The Board of Trustees delegates day-to-day management of the charity to the Executive Director.

All trustees give their time voluntarily and receive no benefits from the charity. Any expenses reclaimed from the charity are set out in note 6 to the accounts.

Financial controls

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

All expenditure is carried out with reference to PI'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 at least two 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 seriously the safety, security and wellbeing of its staff, consultants, partners and contracted sources and researchers 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 risk is one of risk management rather than risk aversion; however, we do not seek to engage in high-risk activities.

PI's 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. We also have a whistleblowing policy in place.

PI reviews and updates its risk framework and risk register on a regular basis. The Board considers the following risks as having the greatest overall potential impact on PI as at the date of signing the Accounts.

1. Insufficiently diverse or unsustainable sources of funding

The focus of policy makers and funders is continuously shifting to meet emerging challenges in ongoing multiple global crises.

PI remains highly reliant on limited number of funders - our most substantive long-term support comes from 4-5 institutional funders, and PI is vulnerable to their strategic changes. The board recognises the lack of flexibility in funding might result in limited resources to respond to unexpected project developments and/or crisis situations.

What is PI doing about it?

PI is coping well, with a strong cash position at the end of fiscal year.

The Executive Director, with the support of the Strategy Team, engages regularly with current PI funders, not only as it relates to financial support but also to make sure they have in-depth understanding of and commitment to issues the sector is tackling and facing. PI regularly reviews the strategic developments of current and potential funders and keeps exploring relationships with other funders in the domain. The executive team also provides regular updates to the Finance and Audit Committee and Board of Trustees.

We also continue to build infrastructure and processes to increase income from the public.

We are working to develop a diverse income portfolio that reduces risk exposure (especially risk of starvation cycle) and dependency on limited number of funding sources, without jeopardising its independence. With a focus on critical operating reserves, PI will also work to ensure the funding structure considers building capital to allow for investment to support further development (i.e. explore new domains and methods).

2. Organisational health

PI transitioned to a new strategic plan in 2023 in a climate of significant external pressures. We need to ensure that the organisation is capable of navigating and responding to these challenges.

What is PI doing about it?

In 2023 PI deployed a new updated staff handbook, after a comprehensive review. We also updated our wellbeing procedure. Staff who feel supported will in return contribute to a balanced and healthy workplace.

Since 2023, Line Managers receive continuous HR training and support. In 2024 this covered performance management and improvement. And Programme Leads receive advanced training and coaching on having challenging conversations.

We updated our Global Risk Framework (policy and accompanying procedures) and revised our organisational risk register, adding context to external pressures and world events affecting our operational considerations. We also updated our anti-bribery and corruption documents and guidance.

Though we were surprised when the Russian Government imposed sanctions on individual members of PI staff in August 2024, our Risk Framework was effective and useful, giving us the tools to adapt and respond.

Appointment of trustees

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.

Trustee induction and training

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.

Remuneration policy for key management personnel

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.

Statement of responsibilities of the trustees

The trustees (who are also directors of Privacy International for the purposes 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 the 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:

- Select suitable accounting policies and then apply them consistently
- Observe the methods and principles in the Charities SORP
- Make judgements and estimates that are reasonable and prudent
- State whether applicable UK Accounting Standards and statements of recommended practice have been followed, subject to any material departures disclosed and explained in the financial statements

- Prepare the financial statements on the going concern basis unless it is inappropriate to presume that the charity will continue in operation.

The trustees are responsible for keeping adequate accounting records that 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. 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.

In so far as the trustees are aware:

- There is no relevant audit information of which the charitable company's auditor is unaware
- 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

The trustees are responsible for the maintenance and integrity of the corporate and financial information included on the charitable company's website. Legislation in the United Kingdom governing the preparation and dissemination of financial statements may differ from legislation in other jurisdictions.

Members of the charity guarantee to contribute an amount not exceeding £1 to the assets of the charity in the event of winding up. The total number of such guarantees at 31 January 2025 was 8 (2024: 7). The trustees are members of the charity but this entitles them only to voting rights. The trustees have no beneficial interest in the charity.

Auditor

Sayer Vincent LLP was re-appointed as the charitable company's auditor during the year and has expressed its willingness to continue in that capacity.

The trustees' annual report has been approved by the trustees on 15 September 2025 and signed on their behalf by:

Joshua Castellino

Chair of the Board

Opinion

We have audited the financial statements of Privacy International (the 'charitable company') for the year ended 31 January 2025 which comprise the statement of financial activities, balance sheet, statement of cash flows and notes to the financial statements, including significant accounting policies. The financial reporting framework that has been applied in their preparation is applicable law and United Kingdom Accounting Standards, including FRS 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 2025 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
- 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 Auditor's 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 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 Privacy International'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 included in the trustees' annual report, other than the financial statements and our auditor's report thereon. The trustees are responsible for the other information contained within the annual report. 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. 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 course of 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 this gives rise to a material misstatement in the financial statements themselves. 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.

Opinions on other matters 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' annual report, for the financial year for which the financial statements are prepared is consistent with the financial statements; and
- The trustees' annual report, has been prepared in accordance with applicable legal requirements.

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 trustees' annual report. We have nothing to report in respect of the following matters in relation to which the Companies Act 2006 requires us to report to you if, in our opinion:

- Adequate 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 directors 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' annual report and from the requirement to prepare a strategic report.

Responsibilities of trustees

As explained more fully in the statement of trustees' responsibilities set out in the trustees' annual report, the trustees (who are also the directors of the charitable company for the purposes of company law) are responsible

Independent auditor's report

to the members of

Privacy International

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 is 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 are set out below.

Capability of the audit in detecting irregularities

In identifying and assessing risks of material misstatement in respect of irregularities, including fraud and non-compliance with laws and regulations, our procedures included the following:

- We enquired of management and Finance and Audit committee, which included obtaining and reviewing supporting documentation, concerning the charity's policies and procedures relating to:
 - Identifying, evaluating, and complying with laws and regulations and whether they were aware of any instances of non-compliance;
 - Detecting and responding to the risks of fraud and whether they have knowledge of any actual, suspected, or alleged fraud;
 - The internal controls established to mitigate risks related to fraud or non-compliance with laws and regulations.
- We inspected the minutes of meetings of those charged with governance.
- We obtained an understanding of the legal and regulatory framework that the charity operates in, focusing on those laws and regulations that had a material effect on the financial statements or that had a fundamental effect on the operations of the charity from our professional and sector experience.
- We communicated applicable laws and regulations throughout the audit team and remained alert to any indications of non-compliance throughout the audit.

Independent auditor's report

to the members of

Privacy International

- We reviewed any reports made to regulators.
- We reviewed the financial statement disclosures and tested these to supporting documentation to assess compliance with applicable laws and regulations.
- We performed analytical procedures to identify any unusual or unexpected relationships that may indicate risks of material misstatement due to fraud.
- In addressing the risk of fraud through management override of controls, we tested the appropriateness of journal entries and other adjustments, assessed whether the judgements made in making accounting estimates are indicative of a potential bias and tested significant transactions that are unusual or those outside the normal course of business.

Because of the inherent limitations of an audit, there is a risk that we will not detect all irregularities, including those leading to a material misstatement in the financial statements or non-compliance with regulation. This risk increases the more that compliance with a law or regulation is removed from the events and transactions reflected in the financial statements, as we will be less likely to become aware of instances of non-compliance. The risk is also greater regarding irregularities occurring due to fraud rather than error, as fraud involves intentional concealment, forgery, collusion, omission or misrepresentation.

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

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 auditor's 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.

Noelia Serrano (Senior statutory auditor)

15 September 2025

for and on behalf of Sayer Vincent LLP, Statutory Auditor

110 Golden Lane, LONDON, EC1Y 0TG

Privacy International

Statement of financial activities (incorporating an income and expenditure account)

For the year ended 31 January 2025

		2025			2024		
	Note	Unrestricted £	Restricted £	Total £	Unrestricted £	Restricted £	Total £
Income from:							
Donations and legacies		27,969	-	27,969	100,759	-	100,759
Charitable activities	2	564,199	1,794,342	2,358,541	1,682,338	792,149	2,474,487
Other income		3,501	-	3,501	13,141	-	13,141
Investments		31,085	-	31,085	6,128	-	6,128
Total income		626,754	1,794,342	2,421,096	1,802,366	792,149	2,594,515
Expenditure on:							
Charitable activities	3	1,203,707	915,144	2,118,851	1,223,004	849,466	2,072,470
Total expenditure		1,203,707	915,144	2,118,851	1,223,004	849,466	2,072,470
Net income for the year	5	(576,953)	879,198	302,245	579,362	(57,317)	522,045
Transfers between funds	14	(13)	13	-	66	(66)	-
Net movement in funds		(576,966)	879,211	302,245	579,428	(57,383)	522,045
Rec Auditor's remuneration (gross of VAT):							
Total funds brought forward		2,914,400	423,695	3,338,095	2,334,972	481,078	2,816,050
Total funds carried forward		2,337,434	1,302,906	3,640,340	2,914,400	423,695	3,338,095

All of the above results are derived from continuing activities. There were no other recognised gains or losses other than those stated above. Movements in funds are disclosed in Note 14a to the financial statements.

Privacy International

Statement of financial activities (incorporating an income and expenditure account)

Company no. 4354366

As at 31 January 2025

		2025		2024	
	Note	£	£	£	£
Fixed assets:					
Tangible assets	10		29,359		31,240
			29,359		31,240
Current assets:					
Debtors	11	57,263		58,760	
Cash at bank and in hand		3,670,095		3,418,976	
		3,727,358		3,477,736	
Liabilities:					
Creditors: amounts falling due within one year	12	(116,377)		(170,881)	
Net current assets			3,610,981		3,306,855
Total net assets			3,640,340		3,338,095
The funds of the charity:	14a				
Restricted income funds			1,302,906		423,695
Unrestricted income funds:					
Designated funds		1,545,863		2,186,402	
General funds		791,571		727,998	
Unrestricted general funds			2,337,434		2,914,400
Total charity funds			3,640,340		3,338,095

Approved by the trustees on 15 September 2025 and signed on their behalf by

Professor Joshua Castellino
Trustee

Privacy International

Statement of financial activities (incorporating an income and expenditure account)

For the year ended 31 January 2025

	2025		2024	
	£	£	£	£
Cash flows from operating activities				
Net income for the reporting period (as per the statement of financial activities)	302,245		522,045	
Depreciation charges	16,600		31,041	
Dividends, interest and rent from investments	(31,085)		(6,128)	
Increase in debtors	1,497		39,470	
(Decrease)/Increase in creditors	(54,504)		54,717	
Net cash provided by operating activities		234,753		641,145
Cash flows from investing activities:				
Dividends, interest and rents from investments	31,085		6,128	
Purchase of fixed assets	(14,719)		(28,766)	
Net cash provided by/(used in) investing activities		16,366		(22,638)
Change in cash and cash equivalents in the year		251,119		618,507
Cash and cash equivalents at the beginning of the year		3,418,976		2,800,469
Cash and cash equivalents at the end of the year		3,670,095		3,418,976
Auditor's remuneration (gross of VAT):				

Analysis of cash and cash equivalents and of net debt

	At 1 February 2024	Cash flows	Other non-cash changes	At 31 January 2025
	£	£	£	£
Cash at bank and in hand	3,418,976	251,119	-	3,670,095
	3,418,976	251,119	-	3,670,095

1 Accounting policies

a) Statutory information

Privacy International is a charitable company limited by guarantee and is incorporated in England & Wales.

The registered office address and principal place of business is 62 Britton Street, London, EC1M 5UY.

b) Basis of preparation

The financial statements have been prepared in accordance with 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) - (Charities SORP FRS 102), The Financial Reporting Standard applicable in the UK and Republic of Ireland (FRS 102) and the Companies Act 2006/Charities Act 2011.

Assets and liabilities are initially recognised at historical cost or transaction value unless otherwise stated in the relevant accounting policy or note.

In applying the financial reporting framework, the trustees have made a number of subjective judgements, for example in respect of significant accounting estimates. Estimates and judgements are continually evaluated and are based on historical experience and other factors, including expectations of future events that are believed to be reasonable under the circumstances. The nature of the estimation means the actual outcomes could differ from those estimates. Any significant estimates and judgements affecting these financial statements are detailed within the relevant accounting policy below.

c) Public benefit entity

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

d) 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.

e) Income

Income is recognised when the charity has entitlement to the funds, any performance conditions attached to the income have been met, it is probable that the income will be received and that the amount can be measured reliably.

Income from government and other grants, whether 'capital' grants or 'revenue' grants, is recognised when the charity has entitlement to the funds, any performance conditions attached to the grants have been met, it is probable that the income will be received and the amount can be measured reliably and is not deferred.

f) Donations of gifts, services and facilities

Donated professional services and donated facilities are recognised as income when the charity has control over the item or received the service, any conditions associated with the donation have been met, the receipt of economic benefit from the use by the charity of the item is probable and that economic benefit can be measured reliably. In accordance with the Charities SORP (FRS 102), volunteer time is not recognised so refer to the trustees' annual report for more information about their contribution.

On receipt, donated gifts, professional services and donated facilities are recognised on the basis of the value of the gift to the charity which is the amount the charity would have been willing to pay to obtain services or facilities of equivalent economic benefit on the open market; a corresponding amount is then recognised in expenditure in the period of receipt.

1 Accounting policies (continued)

g) Interest receivable

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.

h) Fund accounting

Restricted funds are to be used for specific purposes as laid down by the donor. Expenditure which meets these criteria is charged to the fund.

Unrestricted funds are donations and other incoming resources received or generated for the charitable purposes. Designated funds are unrestricted funds earmarked by the trustees for particular purposes.

i) Expenditure recognition

Expenditure is recognised once there is a legal or constructive obligation to make a payment to a third party, it is probable that settlement will be required and the amount of the obligation can be measured reliably. Irrecoverable VAT is charged as a cost against the activity for which the expenditure was incurred. Expenditure is classified under the following activity headings:

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. Irrecoverable VAT is charged as a cost against the activity for which the expenditure was incurred.

Allocation of support costs

Support costs are allocated to the charity's charitable activities.

Governance costs are the costs associated with the governance arrangements of the charity. These costs are associated with constitutional and statutory requirements and include any costs associated with the strategic management of the charity's activities.

1 Accounting policies (continued)

j) 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.

Tangible fixed assets are capitalised where the purchase price exceeds £250 with expected life and/or economic benefit of longer than 1 year.

Depreciation is provided at rates calculated to write down the cost of each asset to its estimated residual value over its expected useful life. The depreciation rates in use are as follows:

* Software	33% on cost
* Computer equipment	50% on cost
* Furniture & fixtures	25% on cost
* Leasehold improvements	20% on cost

k) Debtors

Trade and other debtors are recognised at the settlement amount due after any trade discount offered. Prepayments are valued at the amount prepaid net of any trade discounts due.

l) Cash at bank and in hand

Cash at bank and cash in hand includes cash and short term highly liquid investments with a short maturity of three months or less from the date of acquisition or opening of the deposit or similar account.

m) Creditors and provisions

Creditors and provisions are recognised where the charity has a present obligation resulting from a past event that will probably result in the transfer of funds to a third party and the amount due to settle the obligation can be measured or estimated reliably. Creditors and provisions are normally recognised at their settlement amount after allowing for any trade discounts due.

n) Financial instruments

The charity only has financial assets and financial liabilities of a kind that qualify as basic financial instruments. Basic financial instruments are initially recognised at transaction value and subsequently measured at their settlement value.

o) 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.

2 Income from charitable activities

	2025			2024		
	Unrestricted £	Restricted £	Total £	Unrestricted £	Restricted £	Total £
Grants						
Foundation to Promote Open Society	-	-	-	819,068	-	819,068
Oak Foundation	350,000	-	350,000	250,000	-	250,000
Luminate	-	1,151,714	1,151,714	351,309	-	351,309
Ford Foundation BUILD	195,162	-	195,162	243,540	-	243,540
Donated in-kind services	19,037	-	19,037	18,420	-	18,420
Ford Foundation - project	-	-	-	-	164,400	164,400
Ford Foundation BUILD	-	130,108	130,108	-	162,360	162,360
The Swedish International Development Cooperation Agency - Core support	-	408,998	408,998	-	406,389	406,389
Paul Hamlyn Foundation	-	-	-	-	59,000	59,000
GNP+	-	103,522	103,522	-	-	-
	564,199	1,794,342	2,358,541	1,682,338	792,149	2,474,487

3a Analysis of expenditure (current year)

	Charitable Activities £	Governance costs £	Support costs £	2025 Total £	2024 Total £
Staff costs (Note 6)	1,440,427	-	-	1,440,427	1,396,855
Other staff related costs	39,630	-	-	39,630	60,006
Grants to partners (note 4)	198,182	-	-	198,182	99,951
Project expenses	84,712	-	-	84,712	55,600
Rent	-	-	93,460	93,460	85,468
Depreciation	-	-	16,600	16,600	31,041
Consultancy	56,210	-	-	56,210	106,656
Trustee expenses	-	3,065	-	3,065	4,430
Audit	-	14,364	-	14,364	15,330
(Gains) on foreign exchange	(82)	-	-	(82)	(271)
Office expenses	-	-	108,523	108,523	116,633
Legal and professional fees	4,212	-	19,037	23,249	27,734
Travel and accommodation	36,256	-	-	36,256	64,804
Translation	3,606	-	-	3,606	6,827
Other costs	615	34	-	649	1,405
	1,863,768	17,463	237,620	2,118,851	2,072,470
Support costs	237,620	-	(237,620)	-	-
Governance costs	17,463	(17,463)	-	-	-
Total expenditure 2025	2,118,851	-	-	2,118,851	-
Total expenditure 2024	2,072,470	-	-		2,072,470

Privacy International

Notes to financial statements

For the year ended 31 January 2025

3b Analysis of expenditure (prior year)

	Charitable Activities £	Governance costs £	Support costs £	2024 Total £
Staff costs (Note 6)	1,396,855	-	-	1,396,855
Other staff related costs	60,006	-	-	60,006
Grants to partners (note 4)	99,951	-	-	99,951
Project expenses	55,600	-	-	55,600
Rent	-	-	85,468	85,468
Depreciation	-	-	31,041	31,041
Consultancy	106,656	-	-	106,656
Trustee expenses	-	4,430	-	4,430
Audit	-	15,330	-	15,330
(Gains) on foreign exchange	(271)	-	-	(271)
Office expenses	-	-	116,633	116,633
Legal and professional fees	9,494	-	18,240	27,734
Travel and accommodation	64,804	-	-	64,804
Translation	6,827	-	-	6,827
Other costs	-	13	1,392	1,405
	<hr/>	<hr/>	<hr/>	<hr/>
	1,799,922	19,773	252,774	2,072,470
Support costs	252,774	-	(252,774)	-
Governance costs	19,773	(19,773)	-	-
	<hr/>	<hr/>	<hr/>	<hr/>
Total expenditure 2024	2,072,470	-	-	2,072,470

4 Grant making to institutions

	2025	2024
	£	£
Cost		
The Centre for Internet and Society	12,652	-
Data Privacy Brazil	2,500	-
Foundation for Media Alternatives	19,955	-
Haki Na Sheria	-	10,000
ICJ Kenya	4,000	-
Internet Labs	20,000	-
Fundación Karisma	29,300	14,201
Kenya Legal and Ethical issues network on HIV&AIDS	819	8,000
Paradigm Initiative Nigeria	2,773	24,953
Red en Defensa de los Derechos Civiles	-	5,000
The Libertarian Research & Education Trust	34,504	11,501
Transparencia Electoral	10,071	8,072
Unwanted Witness	2,000	5,000
Other	59,608	13,225
	198,182	99,951

Other grants include grants to partners below £5,000 in the year and also those organisations which need to remain anonymous due to sensitive nature of their work.

5 Net income for the year

This is stated after charging / (crediting):

	2025	2024
	£	£
Depreciation	16,600	31,041
Property	88,069	83,328
Auditor's remuneration (gross of VAT):		
Audit	14,364	13,680

6 Analysis of staff costs, trustee remuneration and expenses, and the cost of key management personnel

	2025 £	2024 £
Salaries and wages	1,203,040	1,174,686
Social security costs	133,705	127,343
Employer's contribution to defined contribution pension schemes	103,682	94,826
	<u>1,440,427</u>	<u>1,396,855</u>

The following number of employees received employee benefits (excluding employer pension costs and employer's national insurance) during the year between:

	2025 No.	2024 No.
£60,000 - £69,999	1	1
£70,000 - £79,999	-	-
£80,000 - £89,999	-	1
£90,000 - £99,999	1	-
	<u>1</u>	<u>-</u>

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 £115,011 (2024: £109,475).

Included within salaries and wages are redundancy and termination costs totaling Nil (2024: £21,213)

No remuneration was paid to any trustee or their associates for services as a trustee during the year ended 31 January 2025 nor to 31 January 2024.

During the year the charity paid 3 trustees' travel expenses £3,065: (2024: £4,430).

7 Staff numbers

The average number of employees (head count based on number of staff employed) during the year was 25 (2024: 25)

8 Related party transactions

There are no related party transactions to disclose for this financial year (2024: none).

9 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.

10 Tangible fixed assets

	Leasehold improvements £	Software £	Computer equipment £	Furniture & fixtures £	Total £
Cost					
At the start of the year	122,717	3,645	70,240	22,916	219,518
Additions in year	4,766	-	9,953	-	14,719
Disposals in year	-	-	-	-	-
At the end of the year	127,483	3,645	80,193	22,916	234,237
Depreciation					
At the start of the year	102,799	3,645	61,540	20,294	188,278
Charge for the year	5,453	-	10,284	863	16,600
Eliminated on disposal	-	-	-	-	-
At the end of the year	108,252	3,645	71,824	21,157	204,878
Net book value					
At the end of the year	19,231	-	8,369	1,758	29,359
At the start of the year	19,918	-	8,700	2,621	31,240

All of the above assets are used for charitable purposes.

11 Debtors

	2025 £	2024 £
Rent deposit	15,478	15,478
Prepayments	41,785	43,282
	57,263	58,760

12 Creditors: amounts falling due within one year

	2025 £	2024 £
Trade creditors	4,122	4,900
Credit cards	3,594	5,435
Payroll taxes	34,972	41,093
Accruals	73,689	119,452
	116,377	170,881

13a Analysis of net assets between funds (current year)

	General unrestricted £	Designated £	Restricted £	Total funds £
Tangible fixed assets	-	29,359	-	29,359
Current assets	791,571	1,632,881	1,302,906	3,727,358
Current liabilities	-	(116,377)	-	(116,377)
Net assets at 31 January 2025	791,571	1,545,863	1,302,906	3,640,340

13b Analysis of net assets between funds (prior year)

	General unrestricted £	Designated £	Restricted £	Total funds £
Tangible fixed assets	-	31,240	-	31,240
Current assets	727,998	2,326,042	423,695	3,477,735
Current liabilities	-	(170,880)	-	(170,880)
Net assets at 31 January 2024	727,998	2,186,402	423,695	3,338,095

14a Movements in funds (current year)

	At 1 February 2024 £	Income & gains £	Expenditure & losses £	Transfers £	At 31 January 2025 £
Restricted funds:					
Ford Foundation	36,029	-	(36,033)	4	
Ford Foundation BUILD	148,303	130,108	(122,789)	-	155,622
The Swedish International Development Cooperation Agency - Core support	239,363	408,998	(648,370)	9	-
Luminate Central Fund	-	1,151,714	(40,818)	-	1,110,896
GNP+	-	103,522	(67,133)	-	36,389
Total restricted funds	423,695	1,794,342	(915,144)	13	1,302,906
Unrestricted funds:					
Designated funds:					
2024 Activity fund	525,912	-	(525,912)	-	-
Strategic fund 2026	1,629,250	545,162	(657,908)	-	1,516,504
Fixed asset fund	31,240	-	-	(1,881)	29,359
Total designated funds	2,186,402	545,162	(1,183,820)	(1,881)	1,545,863
General funds	727,998	81,592	(19,887)	1,868	791,571
Total unrestricted funds	2,914,400	626,754	(1,203,707)	(13)	2,337,434
Total funds	3,338,094	2,421,096	(2,118,851)	-	3,640,340

The narrative to explain the purpose of each fund is given at the foot of the note below.

14b Movements in funds (prior year)

	At 1 February 2023	Income & gains	Expenditure & losses	Transfers	At 31 January 2024
	£	£	£	£	£
Restricted funds:					
Ford Foundation	14,505	164,400	(142,876)	-	36,029
Ford Foundation BUILD	95,589	162,360	(109,646)	-	148,303
Paul Hamlyn Foundation	350	59,000	(59,284)	(66)	
The Swedish International Development Cooperation Agency - Core support	370,634	406,389	(537,660)	-	239,363
Total restricted funds	481,078	792,149	(849,466)	(66)	423,695
Unrestricted funds:					
Designated funds:					
2024 Activity fund	1,607,206	-	(1,081,294)	-	525,912
Strategic fund 2026	-	-	-	1,629,250	1,629,250
Fixed asset fund	33,516	-	-	(2,276)	31,240
Total designated funds	1,640,722	-	(1,081,294)	1,626,974	2,186,402
General funds	694,250	1,802,366	(141,710)	(1,626,908)	727,998
Total unrestricted funds	2,334,972	1,802,366	(1,223,004)	66	2,914,400
Total funds	2,816,050	2,594,515	(2,072,470)	-	3,338,095

Purposes of restricted funds

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.

Ford Foundation

The Ford Foundation is a globally oriented private foundation with the mission of advancing human welfare. In late 2020 Privacy International received a 2 year-grant to support civil society in the Global South to investigate, advocate against and support civil society in understanding implications of developments around global and local responses to COVID-19, extended into early 2024. In October 2020 PI received a five-year general support grant, combined with targeted organisational strengthening through Ford Foundation BUILD program.

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 mid-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. The grant received in 2024 from Luminate's new initiative Central Fund aims to support exploring themes of militarisation of tech through a project managed by PI until 2026.

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 February 2021 PI received a 3-year grant to look into invasive data exploitation practices in immigration processes

The Swedish International Development Cooperation Agency/SIDA

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 January 2017 and completed in April 2021, aimed to strengthen civil society's capacity to protect the right to privacy, while confronting data-driven transformations in power. In June 2021 PI received from SIDA grant to support PI's strategy through to January 2025.

GNP+

GNP+ is a network for people living with HIV, run by people living with HIV. They engage with and support national and regional networks of people living with HIV this ensures that our global work is grounded in their local experiences and priorities. PI received funding from GNP+ to account for PI's role in the delivery of the project hosted at the University of Warwick's Centre for Interdisciplinary Methodologies (CIM), until mid-2026.

Purposes of designated funds

Activity fund 2024

The 2024 activity fund represents funds set aside by the trustees in the 2021/22 and 2022/2023 financial years for delivery of strategic objectives, projects and activities in first year of new strategic year. The Trustees continue to monitor the use of the fund and was fully utilised by January 2025.

Strategic Fund 2026

Strategic Fund 2026 represents funds set aside by trustees from unrestricted funding paid to PI in advance to support delivery of Strategic Plan 2023-2026. Trustees expect the fund to be utilised by 2026.

Fixed Asset fund

The fixed asset fund represents the net book value of fixed assets at year-end as these are not freely available for the charity's use.

15 Operating lease commitments payable as a lessee

The charity's total future minimum lease payments under non-cancellable operating leases is as follows for each of the following periods:

	Property 2025 £	2024 £
Less than one year	96,075	96,075
One to five years	72,056	168,131
	168,131	264,206

16 Legal status of the charity

The charity is a company 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.

PRIVACY INTERNATIONAL

England & Wales - Charity number 1147471

Accounts

Company number: 4354366
Charity number: 1147471

Privacy International

Report and financial statements
For the year ended 31 January 2024



Privacy International

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Privacy International

Reference and administrative information

For the year ended 31 January 2024

Company number 4354366
Country of incorporation United Kingdom

Charity number 1147471
Country of registration England & Wales

Registered office and operational address 62 Britton Street, London, EC1M 5UY

Trustees Trustees, who are also directors under company law, who served during the year and up to the date of this report were as follows:

Benjamin Elihu Wizner	Resigned 30 September 2023
Susan Gardner	Resigned 30 September 2023
Holly Marie Ruthrauff	
Stephen Josef Tibbett	
Antonio Michaelides	
Ahana Datta	
Joshua Castellino	
Amanda Borton	
Mahdis Keshavarz	Appointed 01 May 2024
Martin Georgi	Appointed 01 May 2024

Bankers Barclays Bank
1 Churchill Place
London E14 5HP

Solicitors Covington & Burling
22 Bishopsgate
London EC2N 4BQ

Auditor Sayer Vincent LLP
Chartered Accountants and Statutory Auditor
110 Golden Lane
LONDON
EC1Y 0TG

Privacy International

Trustees' annual report

For the year ended 31 January 2024

The trustees present their report and the audited financial statements for the year ended 31 January 2024.

Reference and administrative information set out on page 1 forms part of this report. The financial statements comply with current statutory requirements, the memorandum and articles of association, the requirements of a directors' report as required under company law, and the Statement of Recommended Practice – Accounting and Reporting by Charities: SORP applicable to charities preparing their accounts in accordance with FRS 102.

Objectives and activities

Purposes and aims

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. 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.

Governance of Privacy International (PI)'s activities

Privacy International's trustees review the aims, objectives and activities of the charity each year. This review also looks at what the charity has achieved and the outcomes of its work in the reporting period. The review also helps the trustees ensure the charity's aims, objectives and activities remained focused on its stated purposes.

The trustees have referred to the guidance contained in the Charity Commission's general guidance on public benefit when reviewing the charity's aims and objectives and in planning its future activities. In particular, the trustees consider how planned activities will contribute to the aims and objectives that have been set.

Privacy International

Trustees' annual report

For the year ended 31 January 2024

Privacy International sets multi-year strategies that the Trustees expect the organisation to deliver upon. Through annual planning of projects that contribute towards multi-year outcomes, the Trustees are able to monitor PI's delivery of its strategic priorities.

PI's strategy for 2023–2026 and the strategic plan was approved by the Board of Trustees in 2022. The strategy states that PI must build a sustainable PI that is capable of creating meaningful system change, genuinely engaging and protecting people, and openly amplifying and scaling impact; by staff who are supported to learn and grow to become effective advocates.

Every December PI establishes an annual plan that prescribes how we will organise our work to achieve change. By March every year we establish indicators for monitoring whether we are achieving results in accordance with our Monitoring & Evaluation framework. These indicators are reviewed at every Trustee meeting, alongside the organisation's risk matrix.

In setting the 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.

What Privacy International worked toward in FY2023 – PI's strategic programmes

PI's **Defending of Democracy and Dissent** programme investigates the role technology plays in facilitating and/or hindering everyone's participation in civic society.

Our **Safeguarding People's Dignity** programme explores how access to services with governments and industry are increasingly dependent on us providing more and more data about ourselves. This puts people and communities who are inherently disadvantaged within our socioeconomic and political ecosystems at risk.

Our **State Accountability** programme challenges how unprecedented surveillance capabilities of governments outstrip the safeguards for our rights.

PI's **Corporate** programme challenges how companies are innovating on surveillance capitalism, reducing people to data for exploitation.

PI's **Organisational Development** focus is put on exploring innovative methods of making the case for change and reaching audiences in ways that are relevant to them. PI will support and amplify the advocacy of partners across the world, and at global fora. PI explores new strategies in approaching our targets together. PI works to support staff by exploring effective learning & development programming, to prepare for future growth opportunities within and beyond PI.

Beneficiaries of our services

Changes in practices and policies by governments and companies as a result of our work have benefited people globally, including as national publics and consumers. 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.

Achievements and performance

The charity's charitable activities focus on achieving change by strategically targeting our tech, legal and policy advocacy at governments and companies who are vying for power to determine the future to their advantage and to the detriment of people's privacy. We track results on an annual basis; knowing that impact often takes longer.

Results and Impact in 2023

At PI we believe HOW we work is as important as WHAT we do. PI's achievements below are presented in accordance with PI's organisational values.

- **We deliver** on our promises. We work on until we achieve our strategic objectives, as stated above.
- **We work with others** to better understand, to engage, to change minds (including our own), and to build a movement.
- **We lead by example**, set high standards, and critically evaluate our work. This means also learning from our mistakes.
- **We are all responsible for building** and maintaining a good and resilient PI and field.

We deliver: Strategic Results and Impact 2023

In 2023 PI was able to directly generate or significantly contribute to a series of landmark courts decisions, regulatory action and legislative developments aimed to create structural premises for ensuring better human rights protections for various categories of people.

Change through Courts and Regulators' Decisions

United Kingdom accountable for its digital spying outside its borders

The European Court of Human Rights ruled in September 2023 on the case *Guarnieri and Wielder v UK*, that UK's security and intelligence agencies breached the right to privacy of two individuals living outside the UK, through the UK's mass surveillance practices. The judgment underscores that security and intelligence agencies must be held responsible for the effects of their actions in the UK no matter where their consequences are felt. *The case was a result of PI's 2015 campaign* asking people to make applications to the UK's Investigatory Powers Tribunal to investigate whether they had been subjected to unlawful surveillance measures by the UK's intelligence agencies.

EU must protect human rights when transferring surveillance tech

The EU Ombudsman decided in December 2023 in PI's favour against the European Border and Coast Guard Agency (Frontex) and the European External Action Service (EEAS) on the transfer of tech to non-EU countries. The decisions, *arising from PI's complaints*, highlighted existing

shortcomings of the European Union agencies' approach to human rights due diligence and articulated that transfer of surveillance capabilities to third countries needs to be subject of standalone human rights impact assessments.

Change through Policy developments

European Commission pushes industry to extend security support for tech

The European Commission published in August 2023 its Regulation for eco-design for smartphones and tablets, that included requirements for manufacturers, importers or authorised representatives to provide for at least 5 years of operating system updates (from the date of end of placement of the product on the market). This means that end-users will benefit from longer protections and functionality of their devices. This change in the regulation was *PI's specific demand* and intensively promoted by PI through our *Best Before Date* advocacy and extensive engagement with the Commission.

EU offers more control of their devices to people

The final text of the EU Directive on empowering consumers for the green transition adopted in January 2024 *reflected PI's language and demands*. In its current version, the Directive contains a strong transparency and other obligations for device manufacturers to ensure that users are empowered and that their devices remain secure.

Strengthened tools against consumer profiling

The European Commission adopted *most of PI's recommendations* in relation to the template regulating the consumer profiling techniques under the Digital Markets Act. PI made a series of recommendations to strengthen the draft template during the consultation period opened by the EC. In the current version, the template provides clear, precise and detailed instructions on the information gatekeepers need to include in audited description of consumer profiling, to allow for the effective monitoring and assessment of gatekeepers' practices and their compliance with the obligations under the DMA.

AI legislation contains some protections against use at borders and in immigration

The final proposal for the EU AI Act was approved in December 2023, and included some key protections against harmful uses of AI in immigration and border control. This was due to the advocacy from ProtectNotSurveil coalition, *of which PI is a member*. PI's participation in the coalition involved co-drafting open civil society statements to negotiators, asking the governments of Belgium, France, Germany, Italy and Spain to push for safeguards in their negotiating positions, and providing evidence of potential harms resulting from a lack of safeguards, based on PI's previous and current work.

Change through key stakeholder engagement

Informing the protection of elections

PI was invited to participate and present at the high-level Declaration of Principles meeting in Addis Ababa, following an invitation from the African Union. The meeting for the first time *featured a session entirely dedicated to Data Protection and Electoral Integrity*, out of a total of six sessions, ensuring its visibility to an international audience of key stakeholders and institutions.

UN special mandate holder speaks out on spyware

A statement on the Development, Use, and Transfer of Commercial Spyware published by the UN Special Rapporteur on the Promotion and Protection of Human Rights and Fundamental Freedoms while Countering Terrorism, raised significant concerns on the issue *reflecting PI's positions and input* to the position paper published in May 2023 (where PI's work was referenced).

UN special mandate holders speak out on UN travel surveillance programme

The UN Special Rapporteur on the Promotion and Protection of Human Rights and Fundamental Freedoms while Countering Terrorism has published a report on the United Nations Countering Terrorist Travel Programme and the goTravel Software Solution, raising significant concerns *in line with PI's briefings and meetings with relevant UN staff* in the last couple of years.

UN Human Rights Commissioner reports on border surveillance

The Office of the High Commissioner on Human Rights' report "Digital Border Governance: A Human Rights Based Approach" published in September 2023, makes extensive references to PI's work – including two references to PI's campaign and complaints on continuous location tracking of migrants through 'GPS tagging', and a reference to PI's broader work on the deployment of digital border technologies. PI had previously participated at the expert-meeting discussions of the report and provided input to earlier drafts.

UNICEF reports on protecting children from surveillance at protests

In August 2023, UNICEF published its report on 'Free and safe to protect policing assemblies involving children'. PI was part of the expert group consulting on the report and its positions are reflected in the paper. PI's contribution resulted in the report calling for higher standards for the use of facial recognition technology in protests.

UN Special mandate holder on right to health and right to privacy

UN Special Rapporteur on the right to health's report on Digital innovations, technology and the right to health, presented to the 53rd HRC session integrated many of the issues outlined by PI and PI's global partners. It referenced PI's work and proposed recommendations reflecting PI's demands. The Special Rapporteur dedicated a whole section of her report to the right to privacy and unprecedented risks faced as a result of digital health innovation and tech in addition to raising privacy concerns in other sections in particular in the section on sexual and reproductive health.

European Parliamentary scrutiny of spyware

The key European Parliament committee investigating spyware adopted its report and recommendation in May 2023, calling for strong safeguards against the EU use and export of spyware. The report *included PI's language, positions, and referenced our research* including on government hacking, encryption, vulnerability handling and disclosure procedures.

Delivering change by Targeting adversaries

Amazon and iRobot forced to terminate their merger

On 29 January 2024 Amazon and iRobot announced that they have entered into a mutual agreement to terminate their previously announced acquisition agreement. The decision came after European Commission's initiated Phase II in-depth investigation and published its Statement of Objections pointing to potential harms of the merger onto competitors and consumers. PI contributed to this result by making submissions to the European Commission's investigation into the merger (as well as to the UK competition regulator); PI was *invited to obtain a third person interest status* in the review of the merger by the Commission. This invitation was the only time a non-consumer rights group was granted third person status in merger review proceedings by the Commission.

French Data Protection regulator (CNIL) fined Doctissimo

Following *PI's complaint* from 2020, in May 2023, CNIL fined French health website doctissimo.fr (Doctissimo) €380,000 euro. The regulator found that Doctissimo failed to comply with obligations under the GDPR and French Data Protection Act mentioning the following infringements: (1) failure to store data for no longer than is necessary; (2) failure to obtain consent from individuals to collect their health data; (3) failure to provide a formal legal framework for the processing operation; (4) failure to ensure the security of personal data and (5) failure to comply with obligations related to the use of cookies. As a result, the company has taken measures to remedy the infringements.

French Data Protection regulator (CNIL) fined AdTech company Criteo

As a result of *PI's complaint* from 2018 and further investigations conducted by CNIL, in June 2023, the regulator fined French AdTech company, Criteo, €40 million for failing to ensure that people had provided their consent to processing of their data, failing to sufficiently inform them and to enable them to exercise their rights. The decision was submitted and approved by all the other 29 European supervisory authorities interested in the case.

... that result then informed a court's decision against Criteo

After the French Data Protection regulator's (CNIL) decision to fine Criteo for their abusive data collection practices, in October 2023 the Amsterdam District Court contended that Criteo did not obtain a 'valid consent for the placement of cookies', which made their placement illegal. The court recognised the CNIL's decision (which resulted from our complaint), holding that Criteo must provide a complete overview of the third parties with whom data has been shared.

Delivering change by Enabling scalable action

Joint regulatory action against Clearview generated impact in 5 countries

Joint regulatory action in 5 countries (the UK, France, Greece, Italy and Austria) against Clearview AI, a facial recognition tech firm, which was collecting people's data from internet. Regulators from all countries issued decisions against Clearview's activity, and most issued fines amounting to over 50 million euros. Coordinated action with other civil society organisations with similar positions and demands resulted in a cascade of regulators' decisions for 3 years in a row.

Joint, beneficiary-led campaign against company involved in migrants' surveillance

Together with two migrants' rights organisations, Bail for Immigration Detainees and Migrants Organise, PI campaigned against Capita's involvement in the UK's GPS tagging of migrants. The campaign aimed to pressure Capita's shareholders to consider the human rights implications of the GPS tagging contract with the UK Government. PI's demands have been supported by over 200 people who sent a letter to Capita following our public action. The campaign also generated attention and support from the many other non-governmental organisations from the migrants' rights sector, and generated media attention to the issue.

Inviting people to raise awareness together on facial recognition

In the context of dramatic rise of facial recognition technology in public spaces in the United Kingdom, PI launched *The End of Privacy in Public* campaign, asking members of the public to ask their representatives in Parliament if facial recognition cameras are being deployed in their local areas. At the moment of writing, dozens of people joined the campaign and messaged their Members of Parliament.

Engaging CSO leaders in other domains to consider their risks

PI's guide for climate activists on how to avoid social media monitoring inspired Greenpeace to organise an internal round-table and review their internal policies. PI was invited and took part in the internal discussions contributing to improvement of Greenpeace's policies.

Delivering change through Fieldbuilding

PI works to build a capable and sustainable civil society that defends privacy globally.

This often means working to support others' visibility, building infrastructure for sustainable advocacy including positions and materials, and helping others to build.

Change through Enabling partners and allies

PI continuously supports partners' research, capacity building and international advocacy initiatives. This requires deep collaboration, including at the strategic levels when our strategic projects work with partners. Coordinating timelines, objectives and results requires care.

Below are some examples of support where PI increases the capacity and visibility of partners:

- InternetLab, with financial and technical support from PI conducted research on surveillance technology in education. After its publication, academics in the state of Paraná in Brazil requested their support around research they have done on Facial Recognition Technology in schools in the state.
- PI provided support to our partner Karisma's submissions to the Colombia Universal Periodic Review (UPR), and supported another Colombian partner Dejusticia in their response to the UN Special Rapporteur on migration on regularisation.
- PI supported our Mexican partner R3D on their UPR submission on Mexico.
- PI is part of the new Digital Health and Rights Project Consortium, bringing together social scientists, human rights lawyers, health advocates, and networks of people living with HIV, to conduct research and advocate for rights-based digital governance in Colombia, Ghana,

Kenya, Vietnam, and globally. PI has been informing the project's global advocacy strategy through capacity building sessions, the digital empowerment strategy, and its participatory action research which will see the involvement of affected communities in particular young people in their diversity. In addition, PI has been supporting and sharing experiences on risk management, grant management and monitoring & evaluation.

Change through Educating others

In 2023 PI updated and added more to our range of educational materials, including a series of guides on how to protect from online tracking providing concrete steps to increase protection on social media, messengers and browsers; our 'Free to Protest guides' revealing a wide range of surveillance tools used to identify and track protesters; a guide for climate activists on social media monitoring. The guides have been adapted and used by the general public, partner organisations, activists and others (including Greenpeace, America Bar Association, the International Detention Coalition, STOPAIDS):

- The American Bar Association Rule of Law Division reached out to PI requesting **translation** (in Bahasa, Thai, Vietnamese, Mandarin languages) of three of PI's educational videos to be included in their legal training syllabuses within different countries around Asia. For instance, the ABA used PI's resources in an online event/training on the right to privacy for approximately 400 participants, mainly lawyers, from Indonesia, Malaysia, the Philippines, Thailand and Vietnam. Trainers showed PI's videos and flagged PI's work.
- The European Agency for Safety at Health at Work included our *Managed by Bots* research in their Campaign toolkit. This shows recognition of PI's positions and research, opening potential for scaling-up of our work.
- PI supported the Digital Rights Foundation in organising of an introductory workshop on the Free to Protest Guide Pakistan for local activists. It was attended by people from the transgender community, religious minorities community, student rights' groups and feminist activists.

Delivering on Protecting affected populations

PI must understand, respond and align itself with the realities and needs of the people whose lives and future we are aiming to make better. Doing this work requires great care to not deprioritise people's issues, nor steal attention, nor expose them to additional risks.

- PI's work on *border and immigration surveillance* has focused on migrants and specifically in the 2022 and 2023 projects those who are targeted with surveillance techniques in the UK, in particular asylum seekers and foreign nationals subject to deportation. This work was informed by feedback from migrants who were subjected to GPS tagging, and PI included some of the affected people in planning meetings and decision making.
- PI's work on health originally foregrounded people who were unable to access technologies, or people seeking abortion-related healthcare information; now PI is also working with a consortium of partners working with people living with HIV and other key populations – predominantly in Kenya, Ghana, Colombia and Vietnam.

- PI also made progress towards having a clearer understanding of the ways the digitisation of public services is having on persons with disabilities. Through this work PI actively consulted and engaged with international organisations of people with disabilities: held meetings with the African Disability Forum and Christian Blind Mission representatives to scope the potential for carrying out work and started to identify opportunities collaboration including trainings to raise awareness amongst other similar organisations and joint areas of concern for further advocacy.

We lead by example: Learning and Reflections

PI learns continuously from interventions, ascertaining where it's falling short of expectations, how to better ensure the relevance of work, and how it can be more effective. PI is also looking around to see what contributes to change, what does not, and what can be done differently.

First, we have been slow at external engagement on 2023's top emerging issues, being 'war' and 'AI'. This may temporarily reduce our profile as public audiences and key institutions focus attention on specific instances each (i.e. Gaza, Ukraine, ChatGPT).

Second, we've struggled to kickstart capacity-building within PI. Our strategic plan's three new internal capacity-building initiatives included: digital communications (which platforms and why and how?), education (for who and for what and how?), research (which methods and tools, why, and when?). They had to develop from scratch but did so more slowly than we had hoped. This began to improve in FY2024.

Third, the uncertainty within the funding community is destabilising for the sector, even though PI is coping well for now. Our partners' sustainability will be further challenged.

Together these factors could lead to a world with many organisations vying for attention for survival. We are concerned that PI's approach of deliberate intervention and field-building will not be as attractive in a future with fewer resources, 'new' pressing issues and crises. Over-reacting to this challenge could also exhaust us.

We predicted these challenges. For instance, our strategy states already that PI does not intend to grow. We also focused 2023 on redeveloping our partnership strategy so we could sustainably support and build the field even as funders may depart. And in 2024 we're developing and deploying a new comms strategy.

We work with others: Our Network and Change

PI convenes a network of organisations from across the world, primarily in eastern Africa, Latin America, and South and South-east Asia. Following the launch of our new strategic plan, we consulted extensively with our partners to develop a Partnership Strategy.

To date, our dominant mode of working with partners was around deep interaction on agreed advocacy objectives. In the new partnership strategy, with partners we identified new forms of collaborations including more flexible partnerships (e.g. multi-year) with a wider array of results (e.g. partner organisational strengthening).

Consequently, in 2023 and 2024 PI re-initiated relationships under the new Partnership Strategy, experimenting with new modes of partnerships (field building and organisational strengthening) and continued to support partners in the form of regranting (to 12 partners in 10 countries).

We build: Core and Internal developments

Launch and implementation of new strategy

In February 2023, PI launched a new strategic plan for 2023–2026, continuing work in the existing 4 strategic priority areas (as above), but now with each of them involving 3 multi-year interventions. In addition, PI identified a series of areas for internal development.

Launching the plan meant PI had to reorganise and build new frameworks for delivering on the new strategic plan. This was made possible by the considerable organisational building undertaken in 2021–2022, particularly on Human Resources Strategy.

Further Human Resources development

The new strategic plan prioritises the growth and development of staff, with specific outcomes and results. This is more than just budgeting for educational development at sector standards but also links their annual performance objectives directly to learning objectives. As a result, the actual use of PI's learning budget has grown significantly.

The Board of Trustees PI also regularly evaluates the remuneration procedure. This is to ensure that PI is providing fair and sustainable salaries, though regularly reviewing annual salaries and also revising our approach to matching pension contributions.

To ensure that PI continues to promote a good working environment, in 2023 PI undertook an extensive exercise on psychological safety: staff were deeply involved in developing a new series of agreements around providing psychological safety for each other. PI also undertook external audit of our wellbeing programme, and developed and finalised a new staff handbook, to bring these to the highest sector standards.

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 slightly to £2.07m (2022/2023: £2.1m) mostly as a result of changes to staff costs and a very slow return to more regular level of activities, as the organisation and its allies kept recovering and re-adjusting the intensity of work in the ongoing global health emergency.

The incoming resources for the year were £2.59m (2022/2023: £2.02m) – the income in 2023/2024 reflects ongoing multi-year grant agreements in support of the organisational strategy (2018–2023 and 2023–2026).

The total funds of the charity at the end of the year were £3.34m. This included £424k in project and other restricted funds and £2.91m in unrestricted funds. The trustees have set aside £2.16m (2024 Activity fund: £526k and Strategic fund 2026: £1.63m) of unrestricted funds as designated funds for delivery of the strategic objectives, projects and activities. The Trustees expect these designated funds to be fully utilised by the end of the strategic plan (2026). There is also £31k of designated fixed assets funds. The remaining £728k are general funds held for operational

working capital requirements to address financial risks surrounding income and expenditure in line with the reserves policy set out below.

Principal risks and uncertainties

Changes in funding environment and shifts due to ongoing multiple global crises and economic uncertainties, including armed conflicts, have potentially positive and negative consequences for PI: while the funding space is shrinking, PI's relevance and expertise continues to be very valued by existing institutional funders. PI recognises the ongoing global crises could cause funders to divert funding to other causes, and we are monitoring these shifts closely. See risk statement below for further information.

Reserves policy and going concern

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 unrestricted and undesignated reserves equivalent to 6 months' running costs – resulting in a target of £840k (currently: £728k, constituting 5.2 months of operational costs, representing the amount of general reserves not designated or otherwise committed to activity expenditure in 2024–2026).

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.

After making appropriate enquiries, the Trustees have a reasonable expectation that the company has adequate resources to continue in operational existence for the foreseeable future. For this reason, they continue to adopt the going concern basis in preparing the financial statements.

Fundraising

PI is working hard to ensure that PI's work is independent, cutting-edge and can be sustained for years to come. As a result, PI's work is funded by a variety of different sources. We do not accept funding from corporations because we believe that it would jeopardise the independence of our activities. We do not work with specialist fundraising service providers and fundraising is conducted by PI staff to maintain our high standards. We have also developed a due diligence process to investigate suspect donations and deal with them accordingly.

Main sources of funding for PI are multi-year grants (core support and project support alike) from a small number of big institutional donors. Public donations remain around 1% of overall annual income, which Privacy International continues to work to change with the goal of diversifying the funding to move away from high dependency on limited number of donors.

In our public fundraising we strive for the highest standards. We do not participate in fundraising and marketing tactics that we see as privacy intrusive, such as highly targeted behavioural advertising. Furthermore, we go beyond the minimum standards laid out in GDPR and have our supporter platform set up so supporters have control over their data, including being able to stop communications and withdraw consent whenever they want.

Privacy International

Trustees' annual report

For the year ended 31 January 2024

In 2023/2024 we did not receive any complaints.

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

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

Volunteers and pro bono support

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, Brick Court Chambers, Doughty Street Chambers, Bhatt Murphy, Liberty, Hausfeld, Duncan Lewis, Wilson Solicitors, Covington & Burling LLP, independent counsel, and various university departments, law clinics and legal experts including at the Harvard Law School Cyberlaw Clinic.

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.

Plans for the future

The Strategy 2023–2026 recognises that we must build a sustainable PI that is capable of creating meaningful system change, genuinely engaging and protecting people, and openly amplifying and scaling impact; by staff who are supported to learn and grow to become effective advocates. Within the new results framework the plan is based on multi-year interventions.

Every planning cycle PI reassess the context, revisit the planned priority results, and explore creating new ones. PI then identifies annual project plans that will make progress towards these results, with their own annual objectives and results.

We will continue our Strategic Interventions in each of our four 'Strategic Area' programmes. Additionally we have set objectives around expanding our skills and capacities, deepening our expertise within core functions, and exploring more resilient operations.

Structure, governance and management

The organisation is a charitable company limited by guarantee, incorporated on 16 January 2002 and registered as a charity on 26 May 2012.

The company was established under a memorandum of association which established the objects and powers of the charitable company and is governed under its articles of association.

All trustees give their time voluntarily and receive no benefits from the charity. Any expenses reclaimed from the charity are set out in note 6 to the accounts.

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. The Board of Trustees delegates day-to-day management of the charity to the Executive Director.

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 seriously the safety, security and wellbeing of its staff, consultants, partners and contracted sources and researchers 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.

PI reviews and updates its risk framework and risk register on a regular basis from which the Board considers the following risks with the greatest overall potential impact on PI as at the date of signing the Accounts.

1. Insufficiently diverse or unsustainable sources of funding

The focus of policy makers and funders is continuously shifting to meet emerging challenges in ongoing multiple global crises. With many actors in the sector vying for attention, there is a risk that resources move away from existing commitments and effective tactics.

This uncertainty within the funding community is destabilising. PI is coping well, with a strong cash position at the end of fiscal year. Nonetheless, the funders' programmatic changes make future planning challenging. Our partners' sustainability will be further challenged.

PI remains highly reliant on limited number of funders – our most substantive long-term support comes from 4–5 institutional funders, and PI is vulnerable to their strategic changes. The board recognised the lack of flexibility in funding might result in limited resources to respond to

unexpected project developments and/or crisis situations. As the global situation continues to deteriorate and donors' attention and their resources could be easily re-directed to other pressing topics and matters.

What is PI doing about it?

The Executive Director, with the support of the Strategy Team, engages regularly with current PI funders, not only as it relates to financial support but also to make sure they have in-depth understanding of and commitment to issues the sector is tackling and facing. PI regularly reviews the strategic developments of current and potential funders and keeps exploring other funders in the domain. The executive team also provides regular updates to the Finance and Audit Committee and Board of Trustees, and invites them to engage with donors, where needed. We continue to build infrastructure and processes to increase income from the public.

PI continues to innovate and explore new areas of work in pioneering ways, to make sure our work remains relevant and effective and bring needed change. The approach is to cooperate (not compete) with and support other actors. As PI plans interventions, it consults beneficiaries and stakeholders to understand and incorporate their perspectives and constantly monitors how PI work responds to beneficiaries' needs, meeting our commitments and progress towards agreed vision and change.

PI also developed planning-scenarios to navigate the period of uncertainty, with Board, partners, and staff and will work to develop a diverse income portfolio that reduces risk exposure (especially risk of starvation cycle) and dependency on limited number of funding sources, without jeopardising its independence. With focus on critical operating reserves while PI will also work to make sure the funding structure considers building capital to allow for investment to support further development (i.e. explore new domains and methods and expand geographically).

2. Organisational health

PI transitioned to the new strategic plan in a climate of significant external pressures. Economic pressures pose risks to staff's health and wellbeing; and PI's ability to deliver.

Building PI as a resilient organisation was essential to PI's ability to navigate this period. As firm believers in organisational strengthening, PI has more to do as an employer to be more effective, efficient, and a good place to work. This is a continuous developmental area.

What is PI doing about it?

IN 2023 PI deployed a new updated staff handbook, after a comprehensive review. Wellbeing management and supporting staff is an integral part of Privacy International's global risk framework and management is key to building a more resilient organisation. Staff who feel supported will in return contribute to a balanced and healthy workplace.

As part of comprehensive review of practices, in 2023 PI conducted an audit of the wellbeing programme and updated it to best sector standards. In order to most effectively support staff, the wellbeing and training programmes now include:

- coaching as part of available counselling schemes
- change management training
- psychological safety workshops

- manager training and support to effectively guide staff.

Further work is needed to cultivate the culture and embed within practices. Staff need greater clarity of expectations when they work together to deliver change and better understanding of their roles with respect to delivery and communications. PI needs to be quicker at adapting based on lessons, embedding them into future actions. Finally, PI is working to consolidate our learning programme, including adapting the externally-supported educational programming/training to our own learning programmes and practices for staff, e.g. develop own 'how to do project management at PI' course, as well as develop mentorship initiatives on communications, tech, and policy advocacy.

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 revised and approved by the Board in 2023 as part of the comprehensive review and update of the staff handbook, and applies to all employees, volunteers and contractors, both in the UK and overseas.

Appointment of trustees

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.

Trustee induction and training

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.

Remuneration policy for key management personnel

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.

Statement of responsibilities of the trustees

The trustees (who are also directors of Privacy International for the purposes 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 the 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:

- Select suitable accounting policies and then apply them consistently
- Observe the methods and principles in the Charities SORP
- Make judgements and estimates that are reasonable and prudent
- State whether applicable UK Accounting Standards and statements of recommended practice have been followed, subject to any material departures disclosed and explained in the financial statements
- Prepare the financial statements on the going concern basis unless it is inappropriate to presume that the charity will continue in operation

The trustees are responsible for keeping adequate accounting records that 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. 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.

In so far as the trustees are aware:

- There is no relevant audit information of which the charitable company's auditor is unaware
- 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

The trustees are responsible for the maintenance and integrity of the corporate and financial information included on the charitable company's website. Legislation in the United Kingdom

governing the preparation and dissemination of financial statements may differ from legislation in other jurisdictions.

Members of the charity guarantee to contribute an amount not exceeding £1 to the assets of the charity in the event of winding up. The total number of such guarantees at 31 January 2024 was 8 (2023: 7). The trustees are members of the charity but this entitles them only to voting rights. The trustees have no beneficial interest in the charity.

Auditor

Sayer Vincent LLP was re-appointed as the charitable company's auditor during the year and has expressed its willingness to continue in that capacity.

The trustees' annual report has been approved by the trustees 18 September 2024 on and signed on their behalf by:

Joshua Castellino

Chair of the Board

Independent auditor's report

to the members of

Privacy International

Opinion

We have audited the financial statements of Privacy International (the 'charitable company') for the year ended 31 January 2024 which comprise the statement of financial activities, balance sheet, statement of cash flows and notes to the financial statements, including significant accounting policies. The financial reporting framework that has been applied in their preparation is applicable law and United Kingdom Accounting Standards, including FRS 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 2024 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
- 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 Auditor's 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 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 Privacy International'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.

Independent auditor's report

to the members of

Privacy International

Other Information

The other information comprises the information included in the trustees' annual report, other than the financial statements and our auditor's report thereon. The trustees are responsible for the other information contained within the annual report. 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. 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 course of 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 this gives rise to a material misstatement in the financial statements themselves. 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.

Opinions on other matters 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' annual report, for the financial year for which the financial statements are prepared is consistent with the financial statements; and
- The trustees' annual report, has been prepared in accordance with applicable legal requirements.

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 trustees' annual report. We have nothing to report in respect of the following matters in relation to which the Companies Act 2006 requires us to report to you if, in our opinion:

- Adequate 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 directors were not entitled to prepare the financial statements in accordance with the small companies regime and take advantage of the small companies' exemptions

Independent auditor's report

to the members of

Privacy International

in preparing the trustees' annual report and from the requirement to prepare a strategic report.

Responsibilities of trustees

As explained more fully in the statement of trustees' responsibilities set out in the trustees' annual report, 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 is 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 are set out below.

Capability of the audit in detecting irregularities

In identifying and assessing risks of material misstatement in respect of irregularities, including fraud and non-compliance with laws and regulations, our procedures included the following:

Independent auditor's report

to the members of

Privacy International

- We enquired of management and Finance and Audit committee, which included obtaining and reviewing supporting documentation, concerning the charity's policies and procedures relating to:
 - Identifying, evaluating, and complying with laws and regulations and whether they were aware of any instances of non-compliance;
 - Detecting and responding to the risks of fraud and whether they have knowledge of any actual, suspected, or alleged fraud;
 - The internal controls established to mitigate risks related to fraud or non-compliance with laws and regulations.
- We inspected the minutes of meetings of those charged with governance.
- We obtained an understanding of the legal and regulatory framework that the charity operates in, focusing on those laws and regulations that had a material effect on the financial statements or that had a fundamental effect on the operations of the charity from our professional and sector experience.
- We communicated applicable laws and regulations throughout the audit team and remained alert to any indications of non-compliance throughout the audit.
- We reviewed any reports made to regulators.
- We reviewed the financial statement disclosures and tested these to supporting documentation to assess compliance with applicable laws and regulations.
- We performed analytical procedures to identify any unusual or unexpected relationships that may indicate risks of material misstatement due to fraud.
- In addressing the risk of fraud through management override of controls, we tested the appropriateness of journal entries and other adjustments, assessed whether the judgements made in making accounting estimates are indicative of a potential bias and tested significant transactions that are unusual or those outside the normal course of business.

Because of the inherent limitations of an audit, there is a risk that we will not detect all irregularities, including those leading to a material misstatement in the financial statements or non-compliance with regulation. This risk increases the more that compliance with a law or regulation is removed from the events and transactions reflected in the financial statements, as we will be less likely to become aware of instances of non-compliance. The risk is also greater regarding irregularities occurring due to fraud rather than error, as fraud involves intentional concealment, forgery, collusion, omission or misrepresentation.

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

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 auditor's 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.

Noelia Serrano (Senior statutory auditor)

30 September 2024

for and on behalf of Sayer Vincent LLP, Statutory Auditor

110 Golden Lane, LONDON, EC1Y 0TG

Privacy International

Statement of financial activities (incorporating an income and expenditure account)

For the year ended 31 January 2024

		2024			2023		
	Note	Unrestricted £	Restricted £	Total £	Unrestricted £	Restricted £	Total £
Income from:							
Donations and legacies		100,759	–	100,759	27,755	–	27,755
Charitable activities	2	1,682,338	792,149	2,474,487	1,361,570	605,029	1,966,599
Other income		13,141	–	13,141	20,242	–	20,242
Investments		6,128	–	6,128	1,156	–	1,156
Total income		1,802,365	792,149	2,594,514	1,410,723	605,029	2,015,752
Expenditure on:							
Charitable activities	3	1,223,004	849,466	2,072,470	1,334,892	766,153	2,101,045
Total expenditure		1,223,004	849,466	2,072,470	1,334,892	766,153	2,101,045
Net income / (expenditure) for the year	5	579,361	(57,317)	522,045	75,831	(161,124)	(85,293)
Transfers between funds	14	66	(66)	–	831	(831)	–
Net movement in funds		579,427	(57,383)	522,045	76,662	(161,955)	(85,293)
Reconciliation of funds:							
Total funds brought forward		2,334,972	481,078	2,816,050	2,258,310	643,033	2,901,343
Total funds carried forward		2,914,399	423,695	3,338,095	2,334,972	481,078	2,816,050

All of the above results are derived from continuing activities. There were no other recognised gains or losses other than those stated above. Movements in funds are disclosed in Note 14a to the financial statements. □

Privacy International

Balance sheet

Company no. 4354366

As at 31 January 2024

		2024		2023	
	Note	£	£	£	£
Fixed assets:					
Tangible assets	10		31,240		33,516
			31,240		33,516
Current assets:					
Debtors	11	58,760		98,230	
Cash at bank and in hand		3,418,976		2,800,469	
		3,477,736		2,898,699	
Liabilities:					
Creditors: amounts falling due within one year	12	(170,881)		(116,165)	
Net current assets			3,306,855		2,782,534
Total net assets			3,338,095		2,816,050
The funds of the charity:	14a				
Restricted income funds			423,695		481,078
Unrestricted income funds:					
Designated funds		2,186,403		1,640,722	
General funds		727,997		694,250	
Unrestricted general funds			2,914,399		2,334,972
Total charity funds			3,338,095		2,816,050

Approved by the trustees on 18 September 2024 and signed on their behalf by

Professor Joshua Castellino
Trustee

Privacy International

Statement of cash flows

For the year ended 31 January 2024

	2024		2023	
	£	£	£	£
Cash flows from operating activities				
Net income for the reporting period (as per the statement of financial activities)	522,045		(85,293)	
Depreciation charges	31,041		32,262	
Dividends, interest and rent from investments	(6,128)		(1,156)	
Decrease/(increase) in debtors	39,470		(37,490)	
Increase in creditors	54,717		19,075	
Net cash provided by/(used in) operating activities		641,145		(72,602)
Cash flows from investing activities:				
Dividends, interest and rents from investments	6,128		1,156	
Purchase of fixed assets	(28,766)		(9,910)	
Net cash (used in) investing activities		(22,638)		(8,754)
Change in cash and cash equivalents in the year		618,507		(81,356)
Cash and cash equivalents at the beginning of the year		2,800,469		2,881,825
Cash and cash equivalents at the end of the year		3,418,976		2,800,469

Analysis of cash and cash equivalents and of net debt

	At 1 February 2023 £	Cash flows £	Other non- cash changes £	At 31 January 2024 £
Cash at bank and in hand	2,800,469	618,507	-	3,418,976
Total cash and cash equivalents	2,800,469	618,507	-	3,418,976

1 Accounting policies

a) Statutory information

Privacy International is a charitable company limited by guarantee and is incorporated in England & Wales.

The registered office address and principal place of business is 62 Britton Street, London, EC1M 5UY.

b) Basis of preparation

The financial statements have been prepared in accordance with 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) – (Charities SORP FRS 102), The Financial Reporting Standard applicable in the UK and Republic of Ireland (FRS 102) and the Companies Act 2006/Charities Act 2011.

Assets and liabilities are initially recognised at historical cost or transaction value unless otherwise stated in the relevant accounting policy or note.

In applying the financial reporting framework, the trustees have made a number of subjective judgements, for example in respect of significant accounting estimates. Estimates and judgements are continually evaluated and are based on historical experience and other factors, including expectations of future events that are believed to be reasonable under the circumstances. The nature of the estimation means the actual outcomes could differ from those estimates. Any significant estimates and judgements affecting these financial statements are detailed within the relevant accounting policy below.

c) Public benefit entity

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

d) 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.

e) Income

Income is recognised when the charity has entitlement to the funds, any performance conditions attached to the income have been met, it is probable that the income will be received and that the amount can be measured reliably.

Income from government and other grants, whether 'capital' grants or 'revenue' grants, is recognised when the charity has entitlement to the funds, any performance conditions attached to the grants have been met, it is probable that the income will be received and the amount can be measured reliably and is not deferred.

f) Donations of gifts, services and facilities

Donated professional services and donated facilities are recognised as income when the charity has control over the item or received the service, any conditions associated with the donation have been met, the receipt of economic benefit from the use by the charity of the item is probable and that economic benefit can be measured reliably. In accordance with the Charities SORP (FRS 102), volunteer time is not recognised so refer to the trustees' annual report for more information about their contribution.

On receipt, donated gifts, professional services and donated facilities are recognised on the basis of the value of the gift to the charity which is the amount the charity would have been willing to pay to obtain services or facilities of equivalent economic benefit on the open market; a corresponding amount is then recognised in expenditure in the period of receipt.

1 Accounting policies (continued)

g) Interest receivable

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.

h) Fund accounting

Restricted funds are to be used for specific purposes as laid down by the donor. Expenditure which meets these criteria is charged to the fund.

Unrestricted funds are donations and other incoming resources received or generated for the charitable
Designated funds are unrestricted funds earmarked by the trustees for particular purposes.

i) Expenditure recognition

Expenditure is recognised once there is a legal or constructive obligation to make a payment to a third party, it is probable that settlement will be required and the amount of the obligation can be measured reliably. Irrecoverable VAT is charged as a cost against the activity for which the expenditure was incurred. Expenditure is classified under the following activity headings:

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. Irrecoverable VAT is charged as a cost against the activity for which the expenditure was incurred.

Allocation of support costs

Support costs are allocated to the charity's charitable activities.

Governance costs are the costs associated with the governance arrangements of the charity. These costs are associated with constitutional and statutory requirements and include any costs associated with the strategic management of the charity's activities.

1 Accounting policies (continued)

j) 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.

Depreciation is provided at rates calculated to write down the cost of each asset to its estimated residual value over its expected useful life. The depreciation rates in use are as follows:

● Software	33% on cost
● Computer equipment	50% on cost
● Furniture & fixtures	25% on cost
● Leasehold improvements	20% on cost

k) Debtors

Trade and other debtors are recognised at the settlement amount due after any trade discount offered. Prepayments are valued at the amount prepaid net of any trade discounts due.

l) Cash at bank and in hand

Cash at bank and cash in hand includes cash and short term highly liquid investments with a short maturity of three months or less from the date of acquisition or opening of the deposit or similar account.

m) Creditors and provisions

Creditors and provisions are recognised where the charity has a present obligation resulting from a past event that will probably result in the transfer of funds to a third party and the amount due to settle the obligation can be measured or estimated reliably. Creditors and provisions are normally recognised at their settlement amount after allowing for any trade discounts due.

n) Financial instruments

The charity only has financial assets and financial liabilities of a kind that qualify as basic financial instruments. Basic financial instruments are initially recognised at transaction value and subsequently measured at their settlement value.

o) 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.

Privacy International

Notes to the financial statements

For the year ended 31 January 2024

2 Income from charitable activities

	2024			2023		
	Unrestricted £	Restricted £	Total £	Unrestricted £	Restricted £	Total £
Grants						
Foundation to Promote Open Society	819,068	-	819,068	-	-	-
Oak Foundation	250,000	-	250,000	263,412	-	263,412
Luminate	351,309	-	351,309	870,831	-	870,831
Ford Foundation BUILD	243,540	-	243,540	211,037	-	211,037
Donated in-kind services	18,420	-	18,420	16,290	-	16,290
Ford Foundation – project	-	164,400	164,400	-	-	-
Ford Foundation BUILD	-	162,360	162,360	-	140,691	140,691
The Swedish International Development Cooperation Agency- Core support	-	406,389	406,389	-	434,906	434,906
The Swedish International Development Cooperation Agency – project grant	-	-	-	-	(28,568)	(28,568)
Paul Hamlyn Foundation	-	59,000	59,000	-	58,000	58,000
	1,682,338	792,149	2,474,487	1,361,570	605,029	1,966,599

3a Analysis of expenditure (current year)

	Charitable Activities £	Governance costs £	Support costs £	2024 Total £	2023 Total £
Staff costs (Note 6)	1,396,855	-	-	1,396,855	1,372,227
Other staff related costs	60,006	-	-	60,006	31,320
Grants to partners (note 4)	99,951	-	-	99,951	234,503
Project expenses	55,600	-	-	55,600	62,863
Rent	-	-	85,468	85,468	83,397
Depreciation	-	-	31,041	31,041	33,411
Consultancy	106,656	-	-	106,656	99,325
Trustee expenses	4,430	-	-	4,430	2,866
Audit	-	15,330	-	15,330	10,260
(Gains) on foreign exchange	(271)	-	-	(271)	(65)
Office expenses	-	-	116,633	116,633	99,703
Legal and professional fees	9,494	-	18,240	27,734	26,681
Travel and accommodation	64,804	-	-	64,804	31,082
Translation	6,827	-	-	6,827	11,417
Other costs	-	13	1,392	1,405	2,056
	<u>1,804,353</u>	<u>15,343</u>	<u>252,774</u>	<u>2,072,470</u>	<u>2,101,045</u>
Support costs	252,774	-	(252,774)	-	-
Governance costs	15,343	(15,343)	-	-	-
Total expenditure 2024	<u>2,072,470</u>	<u>-</u>	<u>-</u>	<u>2,072,470</u>	2,101,045
Total expenditure 2023	<u>-</u>	<u>-</u>	<u>-</u>		<u>2,101,045</u>

3b Analysis of expenditure (prior year)

	Charitable Activities £	Governance costs £	Support costs £	2023 Total £	2022 Total £
Staff costs (Note 6)	1,372,227	-	-	1,372,227	1,267,775
Other staff related costs	31,320	-	-	31,320	30,536
Grants to partners (note 4)	234,503	-	-	234,503	232,269
Project expenses	62,863	-	-	62,863	27,107
Rent	-	-	83,397	83,397	85,416
Depreciation	-	-	33,411	33,411	33,651
Consultancy	90,252	-	9,073	99,325	51,782
Trustee expenses	2,866	-	-	2,866	-
Audit	-	10,260	-	10,260	22,320
(Gains) on foreign exchange	(65)	-	-	(65)	61
Office expenses	-	-	99,703	99,703	104,401
Legal and professional fees	10,391	-	16,290	26,681	32,955
Travel and accommodation	31,082	-	-	31,082	528
Translation	11,417	-	-	11,417	12,312
Other costs	-	13	2,043	2,056	2,665
	<u>1,846,855</u>	<u>10,273</u>	<u>243,916</u>	<u>2,101,045</u>	<u>1,903,778</u>
Support costs	243,916	-	(243,916)	-	-
Governance costs	10,273	(10,273)	-	-	-
Total expenditure 2023	<u><u>2,101,045</u></u>	<u><u>-</u></u>	<u><u>-</u></u>	<u><u>2,101,045</u></u>	

4a Grant making to institutions

	2024	2023
	£	£
Cost		
Asociación por los Derechos Civiles	–	19,000
The Centre for Internet and Society	–	15,923
Corporación Centro De Estudios de Derecho, Justicia y Sociedad – Dejusticia	–	10,000
Derechos Digitales	–	4,000
Foundaiton for Media Alternatives	–	13,369
Haki Na Sheria	10,000	11,140
Hermes Center for Transparency and Digital Human	–	9,999
ICJ Kenya	–	45,105
Internet Labs	–	9,000
Ipandetec	–	1,000
Fundación Karisma	14,201	31,526
Kenya Legal and Ethical issues network on HIV&AIDS	8,000	10,000
Paradigm Initiative Nigeria	24,953	–
Red en Defensa de los Derechos Civiles	5,000	–
The Libertarian Research & Education Trust	11,501	17,216
TEDIC	–	10,000
Transparencia Electoral	8,072	–
Unwanted Witness	5,000	5,000
Other	13,225	22,225
	99,951	234,503

Other grants include grants to partners below £5,000 in the year and also those organisations which need to remain anonymous due to sensitive nature of their work.

5 Net income / (expenditure) for the year

This is stated after charging / (crediting):

	2024	2023
	£	£
Depreciation	31,041	33,411
Operating lease rentals payable:		
Property	83,328	79,375
Auditor's remuneration (gross of VAT):		
Audit	13,680	12,780
Other services	–	–

6 Analysis of staff costs, trustee remuneration and expenses, and the cost of key management personnel

Staff costs were as follows:

	2024 £	2023 £
Salaries and wages	1,174,686	1,157,365
Social security costs	127,343	135,555
Employer's contribution to defined contribution pension schemes	94,826	79,307
	<u>1,396,855</u>	<u>1,372,227</u>

The following number of employees received employee benefits (excluding employer pension costs and employer's national insurance) during the year between:

	2024 No.	2023 No.
£60,000 – £69,999	1	1
£70,000 – £79,999	–	–
£80,000 – £89,999	1	1
	<u>1</u>	<u>1</u>

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 £109,475 (2023: £91,285).

Included within salaries and wages are redundancy and termination costs totaling £21,213 (2023: Nil)

No remuneration was paid to any trustee or their associates for services as a trustee during the year ended 31 January 2024 nor to 31 January 2023.

During the year the charity paid 3 trustees' travel expenses £4,430: (2023: 2,866).

7 Staff numbers

The average number of employees (head count based on number of staff employed) during the year was 25 (2023: 25)

8 Related party transactions

There are no related party transactions to disclose for this financial year (2023: none).

9 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.

10 Tangible fixed assets

	Leasehold improvements £	Software £	Computer equipment £	Furniture & fixtures £	Total £
Cost					
At the start of the year	107,315	3,645	73,399	23,696	208,055
Additions in year	18,480	–	9,331	955	28,766
Disposals in year	(3,078)	–	(12,490)	(1,735)	(17,303)
At the end of the year	122,717	3,645	70,240	22,916	219,518
Depreciation					
At the start of the year	87,603	3,645	63,059	20,232	174,539
Charge for the year	18,274	–	10,970	1,797	31,041
Eliminated on disposal	(3,078)	–	(12,490)	(1,735)	(17,303)
At the end of the year	102,799	3,645	61,539	20,294	188,278
Net book value					
At the end of the year	19,918	–	8,700	2,621	31,240
At the start of the year	19,712	–	10,340	3,464	33,516

All of the above assets are used for charitable purposes.

11 Debtors

	2024 £	2023 £
Rent deposit	15,478	15,478
Prepayments	43,282	63,408
Accrued income	–	19,344
	58,760	98,230

12 Creditors: amounts falling due within one year

	2024 £	2023 £
Trade creditors	4,900	13,444
Credit cards	5,435	3,767
Payroll taxes	41,093	29,861
Accruals	119,452	69,093
	170,881	116,165

13a Analysis of net assets between funds (current year)

	General unrestricted £	Designated £	Restricted £	Total funds £
Tangible fixed assets	-	31,240	-	31,240
Current assets	727,997	2,326,044	423,695	3,477,736
Current liabilities	-	(170,881)	-	(170,881)
Net assets at 31 January 2024	727,997	2,186,402	423,695	3,338,095

13b Analysis of net assets between funds (prior year)

	General unrestricted £	Designated £	Restricted £	Total funds £
Tangible fixed assets	-	33,516	-	33,516
Current assets	694,250	1,723,371	481,078	2,898,699
Current liabilities	-	(116,165)	-	(116,165)
Net assets at 31 January 2023	694,250	1,640,722	481,078	2,816,050

14a Movements in funds (current year)

	At 1 February 2023 £	Income & gains £	Expenditure & losses £	Transfers £	At 31 January 2024 £
Restricted funds:					
Ford Foundation	14,505	164,400	(142,876)	-	36,029
Ford Foundation BUILD	95,589	162,360	(109,646)	-	148,303
Paul Hamlyn Foundation	350	59,000	(59,284)	(66)	-
The Swedish International Development Cooperation Agency – Core support					
	370,634	406,389	(537,660)	-	239,363
Total restricted funds	481,078	792,149	(849,466)	(66)	423,695
Unrestricted funds:					
Designated funds:					
2024 Activity fund	1,607,206	-	(1,081,294)	-	525,913
Strategic fund 2026	-	-	-	1,629,250	1,629,250
Fixed asset fund	33,516	-	-	(2,276)	31,240
Total designated funds	1,640,722	-	(1,081,294)	1,626,974	2,186,403
General funds	694,250	1,802,365	(141,710)	(1,626,908)	727,997
Total unrestricted funds	2,334,972	1,802,365	(1,223,004)	66	2,914,399
Total funds	2,816,050	2,594,514	(2,072,470)	-	3,338,095

The narrative to explain the purpose of each fund is given at the foot of the note below.

14b Movements in funds (prior year)

	At 31 January 2022	Income & gains	Expenditure & losses	Transfers	At 31 January 2023
	£	£	£	£	£
Restricted funds:					
Ford Foundation	180,750	-	(166,245)	-	14,505
Ford Foundation BUILD	50,150	140,691	(95,252)	-	95,589
Foundation to Promote Open Society – Eurasia	33,345	-	(33,476)	131	-
Luminate	32,478	-	(32,461)	(17)	-
Paul Hamlyn Foundation	1,030	58,000	(58,680)	-	350
The Swedish International Development Cooperation Agency – Core support	315,752	434,906	(380,024)	-	370,634
The Swedish International Development Cooperation Agency – project	29,528	(28,568)	(15)	(945)	-
Total restricted funds	643,034	605,029	(766,153)	(831)	481,078
Unrestricted funds:					
Designated funds:					
2024 Activity fund	1,579,576	-	(1,317,650)	1,345,280	1,607,206
Fixed asset fund	55,868	-	-	(22,352)	33,516
Total designated funds	1,635,444	-	(1,317,650)	1,322,928	1,640,722
General funds	622,866	1,410,723	(17,242)	(1,322,097)	694,250
Total unrestricted funds	2,258,310	1,410,723	(1,334,892)	831	2,334,972
Total funds	2,901,343	2,015,752	(2,101,045)	-	2,816,050

Purposes of restricted funds

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.

Ford Foundation

The Ford Foundation is a globally oriented private foundation with the mission of advancing human welfare. In late 2020 Privacy International received a 2 year-grant to support civil society in the Global South to investigate, advocate against and support civil society in understanding implications of developments around global and local responses to COVID-19, extended into early 2024. In October 2020 PI received a five-year general support grant, combined with targeted organizational strengthening through Ford Foundation BUILD program.

Foundation to Promote Open Society/OSF

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 September 2021 PI received a grant to explore our engagement in new geographical areas, with specific focus on civil society in Eurasia region.

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 mid-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 February 2021 PI received a 3-year grant to look into invasive data exploitation practices in immigration processes

The Swedish International Development Cooperation Agency/SIDA

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 January 2017 and completed in April 2021, aimed to strengthen civil society's capacity to protect the right to privacy, while confronting data-driven transformations in power. In June 2021 PI received from SIDA grant to support PI's strategy through to January 2025.

Purposes of designated funds

Activity fund 2024

The 2024 activity fund represents funds set aside by the trustees in the 2021/22 and 2022/2023 financial years for delivery of strategic objectives, projects and activities in first year of new strategic year. The Trustees continue to monitor the use of the fund and expect the fund to be fully utilised by January 2025.

Strategic Fund 2026

Strategic Fund 2026 represents funds set aside by trustees from unrestricted funding paid to PI in advance to support delivery of Strategic Plan 2023–2026. Trustees expect the fund to be utilised by 2026

Fixed Asset fund

The fixed asset fund represents the net book value of fixed assets at year-end as these are not freely available for the charity's use.

15 Operating lease commitments payable as a lessee

The charity's total future minimum lease payments under non-cancellable operating leases is as follows for each of the following periods:

	Property 2024 £	2023 £
Less than one year	96,075	41,750
One to five years	168,131	–
Over five years	–	–
	264,206	41,750

16 Legal status of the charity

The charity is a company 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.

PRIVACY INTERNATIONAL

England & Wales - Charity number 1147471

Accounts

Company number: 4354366

Charity number: 1147471

Privacy International

Report and financial statements

For the year ended 31 January 2023

Privacy International

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For the year ended 31 January 2023

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Privacy International

Reference and administrative information

For the year ended 31 January 2023

Company number 4354366
Country of incorporation United Kingdom

Charity number 1147471
Country of registration England & Wales

Registered office and operational address 62 Britton Street, London, EC1M 5UY

Trustees Trustees, who are also directors under company law, who served during the year and up to the date of this report were as follows:

Eve Salomon	Resigned 30 June 2022
Peter Noorlander	Resigned 30 June 2022
Benjamin Elihu Wizner	
Susan Gardner	
Holly Marie Ruthrauff	
Stephen Josef Tibbett	
Antonio Michaelides	
Ahana Datta	
Werbayne Ruthven McIntyre	Resigned 17 July 2023
Joshua Castellino	
Amanda Borton	

Bankers Barclays Bank
1 Churchill Place
London E14 5HP

Solicitors Covington & Burling
22 Bishopsgate
London EC2N 4BQ

Auditor Sayer Vincent LLP
Chartered Accountants and Statutory Auditor
Invicta House
108–114 Golden Lane
LONDON
EC1Y 0TL

Privacy International

Trustees' annual report

For the year ended 31 January 2023

The trustees present their report and the audited financial statements for the year ended 31 January 2023.

Reference and administrative information set out on page 1 forms part of this report. The financial statements comply with current statutory requirements, the memorandum and articles of association, the requirements of a directors' report as required under company law, and the Statement of Recommended Practice – Accounting and Reporting by Charities: SORP applicable to charities preparing their accounts in accordance with FRS 102.

Objectives and activities

Purposes and aims

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. 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.

Governance of Privacy International (PI)'s activities

Privacy International's trustees review the aims, objectives and activities of the charity each year. This review also looks at what the charity has achieved and the outcomes of its work in the reporting period. The review also helps the trustees ensure the charity's aims, objectives and activities remained focused on its stated purposes.

The trustees have referred to the guidance contained in the Charity Commission's general guidance on public benefit when reviewing the charity's aims and objectives and in planning its future activities. In particular, the trustees consider how planned activities will contribute to the aims and objectives that have been set.

Privacy International sets multi-year strategies that the Trustees expect the organisation to deliver upon. Through annual planning of projects that contribute towards multi-year outcomes, the Trustees are able to monitor PI's delivery of its strategic priorities.

PI's strategy for 2019–2022 came to an end at the end of FY2022. The priority for this strategy was for PI to become more resilient and impact-oriented in pressing domains across the world. Those domains were identified as i) elections and civic spaces, ii) economic and social rights, iii) government exploitation of systems and data, and iv) corporate exploitation of people's data. The new strategy and strategic plan for 2023–2026 was approved by the Board of Trustees in September 2022 and December 2022 respectively. The new strategy states that we must build a sustainable PI that is capable of creating meaningful system change, genuinely engaging and protecting people, and openly amplifying and scaling impact; by staff who are supported to learn and grow to become effective advocates.

Every December PI establishes an annual plan that prescribes how we will organise our work to achieve change. By March every year we establish indicators for monitoring whether we are achieving results in accordance with our Monitoring & Evaluation framework. These indicators are reviewed at every Trustee meeting, alongside the organisation's risk matrix.

In setting the 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.

What Privacy International worked toward in FY2022– our strategic programmes

PI's **Defending of Democracy and Dissent** programme investigates the role technology plays in facilitating and/or hindering everyone's participation in civic society. We advocate for limits on data exploitation throughout the election cycle. We challenge the ability of police forces and intelligence agencies to monitor people in increasingly intrusive ways. Ultimately, we fight to preserve the privacy, dignity, and autonomy of individuals so that they can exercise and defend their own rights and freedoms.

In FY2022 we focused on:

Protecting The Election Cycle

- ensuring international bodies' election observation guides and methodologies incorporated robust privacy and data protection assessments, in accordance with PI's recommendations.
- supporting civil society organisations from Lebanon, Colombia, Philippines, Kenya and Brazil, to engage in monitoring political campaigns and election process in their countries.
- advocating for regulators to impose changes in operations of the political consultancies involved in political campaigns.

Resisting Civic Dystopias

- ensuring that the police, border authorities and governmental agencies become more transparent and accountable in their use of new technologies and halt the use of the most invasive technologies.

Protecting Civic Spaces, opposing mass surveillance

- advocating for governments to declare certain mass surveillance practices as illegal, or to prevent resulting human rights abuses.

Our **Safeguarding People's Dignity** programme explores how access to services with governments and industry are increasingly dependent on us providing more and more data about ourselves. This puts people and communities who are inherently disadvantaged within our socioeconomic and political ecosystems at risk. We believe that innovative solutions can be designed to empower and serve individuals and communities, rather than entrenching state and corporate power.

In FY2022 we focused on:

Challenging and holding to account proponents of Digital ID

- advocating for the proponents and funders of ID systems to ensure human rights due diligence to inform decision-making and set safeguards prior to system deployment.

Social protection

- advocating for governments to improve privacy, data protection and economic and social rights standards in social protection, and modify practices and private sector partnerships that fall short of our demands or recommendations.
- ensuring that international bodies (World Bank, World Health Organization and others) critically assess and amend the features of social protection initiatives that they have funded and evaluate the long-term impact on privacy and data protection rights.

Covid-19 reflections

- monitoring governments' pandemic response and advocating for appropriate and responsible uses of data and tech in management of health emergencies, and critically reflecting on tech solutionism and unreasonable data-intensivity.

Migration

- working with other actors in the sectors to advocate for governments to ensure that use of data and tech for immigration enforcement and border management does not negatively or disproportionately impact the rights of migrant and refugee communities, that data and technology is used in accordance with human rights standards, and within regulatory or legal framework.

Our **Government Exploitation** programme challenges how unprecedented surveillance capabilities of governments outstrip the safeguards for our rights. We are exposing, advocating, and litigating for stronger protections. We are shining a light on the surveillance trade, exposing the companies, the buyers, and the impacts on human rights. We advocate for good practices and strong laws that protect human rights worldwide.

In FY2022 we focused on:

Drivers of surveillance

- targeting key proponents and enablers of surveillance – at the UN, the EU, and the US to promote transparency and obtain safeguards to challenge the logic which drives the proliferation of surveillance at borders and within public spaces around the world.

Securing our Digital Life

- advocating for stronger security by challenging governments' increasing use of intrusive system exploitation tools, such as hacking, or attempts to break encrypted communications.
- advocating that policymakers, regulators, and legislators introduce obligations on companies to guarantee the long-term software support of connected devices.

Partners in surveillance

- continuing research into governments' exploitation of corporate data infrastructures across the world for their own surveillance purposes and demonstrating how these privacy invasions lead to human rights violations.
- challenging the use by public authorities of unprecedented private online surveillance tools, by keeping up our legal fight against Clearview AI and similar companies, and mapping obstacles to the transparency of companies' algorithms at play in these partnerships, through novel legal research and strategy.

PI's **Corporate Exploitation** programme challenges how companies are innovating on surveillance capitalism, reducing people to data for exploitation. At PI, we are investigating how our data is generated and exploited, engaging the public through awareness-raising campaigns, and exploring the necessary legal and technological frameworks to protect against data exploitation.

In FY2022 we focused on:

AdTech

- researching and campaigning for companies' websites and apps to make global changes to their data collection practices to ensure all users across the world have equal protections.
- targeting regulators to acknowledge the existing gaps in data protection regulations through presenting our research, causing them to act and issue fines.

Competition

- targeting companies' market dominance by reducing their data exploitation practices through regulatory decisions.

Working for the algorithm

- exposing the harms and the current power imbalances between employer and employees in areas where algorithms play determinant roles (gig economy workers, adult content creators, youtubers, remote workers).
- creating resources for workers by engaging with new allies to demand specific changes to platforms.

Our Network and Change

In 2022, PI provided direct support to 18 partner organisations from 13 countries, to deepen their privacy-related work and enable them to effectively challenge governments and companies involved in abusing people's data. As a result, partners in our Network have a greater capacity to achieve specific outcomes at the national level.

We strengthened their organisational capacities and the Network's collective approach to advocacy and campaigning, as well as communicating results and impact. We further explored work with organisations in new geographic areas (with a focus on Eurasia) and areas where the Network could use more diversity and reach.

Beneficiaries of our services

Changes in practices and policies by governments and companies as a result of our work have benefited people globally, including as national publics and consumers. 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.

To ensure that we are achieving change that helps our beneficiaries, we track our activities through to results. Our activities include uncovering technological risks, leading global campaigns, intervening in courts, and motivating regulatory reform to prevent misuse of technology and consequent abuses. Through extensive outreach and media engagement, we ensure our work reaches expanded audiences across the world. These activities create pressure on governments and companies to improve their safeguards for people's benefit.

Core PI values include being good partner and leading by example. We believe a capable and informed global civil society is a core safeguard against transgressions by governments and companies. PI continuously develops partners' capacity to research, communicate and advocate on the privacy-related issues, and improve their expertise in Monitoring and Evaluation, policy and advocacy, external communication, risk modelling, and technical research.

Achievements and performance

The charity's charitable activities focus on achieving change by strategically targeting our tech, legal and policy advocacy at governments and companies who are vying for power to determine the future to their advantage and to the detriment of people's privacy. We track results on an annual basis; knowing that impact often takes longer.

Results and Impact in 2022

We leverage systemic pressure points

By informing how democratic, regulatory, and judicial institutions carry out their duties, we can enhance the protection of privacy. We define a result as a specific instance when we our advocacy is heard by key institutions. We define impact as when these institutions use their powers to advance the protection of privacy.

Related Results

- PI's work, including the Guide on International Law and Surveillance, was used to inform the arguments for an amicus drafted by the University of Berkeley's International Human Rights Law Clinic for a case being heard by the Inter-American Court of Human Rights.
- The European Court of Human Rights approved settlement terms we agreed with the UK Foreign, Commonwealth & Development Office in a challenge to a blanket Freedom of Information Act exemption. This decision opens the door to national challenges to blanket Freedom of Information Act exemptions applied to certain government agencies.

- Our research and positions have been referenced in documents and reports by international bodies and institutions including: European Parliament's Europe's Pegasus Gate report; the draft report of the European Parliament IMCO Rapporteur for the Directive on empowering consumers; the UN High Commissioner for Human Rights reports on the right to privacy in the digital age, and the report on the practical application of the Guiding Principles on Business and Human Rights to the activities of technology, and Human Rights and Temporary Labour Migration Programme in and from Asia and the Pacific; UN Special Rapporteur on counter terrorism's position paper on Global Regulation of the Counter-Terrorism Spyware Technology.
- As a result of PI's previous engagement, the UK Information Commissioner's Office, the privacy regulator, integrated PI's concerns about the use of productivity tools for surveillance purposes in their draft guidance on monitoring at work employment practices.

Related Impact stories

Current draft of the pandemic treaty includes clear data protection principles.

International entities proposed a treaty "WHO Convention, Agreement or Other International Instrument on Pandemic Prevention, Preparedness and Response" (WHO CA+) that might give to World Health Organisation a regulatory power to enact international health policies. As a result of PI's advocacy, the zero draft of the convention include a stand-alone article on confidentiality/data protection we advocated for. The article clearly articulates that "any exchange of data or information by the Parties pursuant to the WHO CA+ shall respect the right to privacy".

Regulators in France, Italy, Greece, and the UK fined and restricted leading AI facial recognition provider.

In partnership with organisations from Austria, Greece, and Italy, we filed complaints against Clearview AI with national data protection regulators. After provisional decisions announced in 2021, in 2022 regulators imposed significant fines and ordered the company to delete and stop collecting and processing people's data. Specifically: the UK ICO issued its final decision, imposing a fine of £7,552,800 on the company and ordering it to delete and stop further processing of UK residents' data; Italy's Garante also found Clearview's data processing illegal, and imposed a €20 million (the maximum fine amount under the EU GDPR) fine on the company; Greece's Hellenic data protection authority also fined the company €20 million, and ordered it to delete and stop collecting data of data subjects located in Greece; France's CNIL fined the company €20 million as it had failed to comply with a prior order.

Formal recognition of the Europe Union's failure to protect human rights while providing surveillance aid to African countries.

Following our complaint, the European Ombudsman concluded that the European Commission failed to take necessary measures to ensure the protection of human rights in the transfers of technology with potential surveillance capacity supported by its multi-billion Emergency Trust Fund for Africa (EUTF). The Ombudsman recommended that "EUTF projects, both in Africa and elsewhere, should require an assessment of the potential human rights impact of projects" with "corresponding mitigation measures". This decision sets up new human rights standards for EU programmes that might undermine people's rights and freedoms. The European Ombudsman further has launched new investigations into the European Border and Coast Guard Agency (Frontex) and the European External Action Service (EEAS), the EU's diplomatic agency.

UK High Court ruled that seizing mobile phones from asylum seekers was unlawful.

Early in 2022, PI intervened in a case against mobile phone seizures and data extraction applied to asylum seekers arriving by small boats in the UK. On 25 March 2022, the High Court ruled that the UK Home Office blanket policy of seizing mobile phones from asylum seekers was unlawful, and found that migrants shouldn't have been compelled to provide their passcodes that protect access to the phones. On 14 October 2022, the UK High Court ruled on the Government breaching a duty of candour in the case by denying the existence of a blanket policy to seize migrant's mobile phones. The court ordered the UK Home Office to provide remedy to the thousands of migrants affected by its unlawful policy and practice of seizing mobile phones from people arriving by small boats to UK.

The European Court of Human Rights confirmed that bulk interception violates fundamental rights.

On 10 March 2022, the European Court of Human Rights issued a decision, in relation to HRW and Ball case. This was a result of our campaign, and was a case we supported. The decision confirmed the UK government's admission that its bulk interception regime was not compliant with Article 8 (right to privacy) and Article 10 (freedom of expression) of the European Convention on Human Rights, with regard to the treatment of confidential journalistic material. The UK government acknowledged that parts of its historic mass investigatory powers regime violated these human rights. The government also agreed to pay compensation to the applicants.

Tribunal condemned long-term rule breaking by UK intelligence agency.

Privacy International and Liberty won a landmark case against the unlawful handling of millions of people's data by the UK's Security Service (MI5). The Investigatory Powers Tribunal found that MI5 unlawfully held large amounts of data because of the lack of the necessary safeguards over retention, review and deletion, as imposed by the law. This conduct, the Tribunal concluded, was tolerated by the Home Secretary who issued warrants unlawfully despite knowing about signs of MI5's breaches.

Regulators forced de-merger in Big Tech.

The UK Competition and Markets Authority's (CMA) confirmed its decision to order Meta to sell Giphy, citing concerns over users' data. This resulted from the Competition Appeal Tribunal (CAT)'s judgment confirming that the completed merger between Meta and GIPHY will give rise to a substantial lessening of competition. PI intervened in both: the initial CMA investigation, and in the appeal before CAT. Both decisions reflected the position we advocated for in our interventions.

We change companies' and governments' behaviours

Through strategic advocacy that targets the specific behaviours of companies and governments that we believe threaten people's privacy, we confront them with our specific demands. We define a result as when we are able to get stakeholders to make similar demands. We define impact as when the companies and governments change their behaviours in ways that we sought.

Related Results

- Our research on GPS tags being used on migrants resulted in responsiveness from the targeted companies. In early January 2023, we had sent our draft report on the roles of 5 companies (Capita, G4S, Telefonica, Airbus and Buddi) in the UK's GPS tagging system. As a result, 3

(Capita, G4S and Telefonica) out of 5 companies we targeted responded to our letter and draft report on GPS tags, which opens avenue for further advocacy with them.

- Our findings on the intersection of privacy and sexual and reproductive health became even more relevant in post-*Roe* times. Seven US senators signed a letter addressed to Heartbeat International citing PI's documentation of data exploitation in sexual and reproductive rights and making inquiries relating to Heartbeat International's data protection practices.
- PI's FOI requests resulted in new disclosures from the UK Government and fuels further advocacy. Through FOI requests in the UK, we obtained detailed information from the Home Office in relation to their use of GPS tags on migrants; our information requests to police forces in relation to their use of drones resulted in disclosure of internal assessments and identification of the companies used by police forces to purchase drones. Using information obtained through FOI requests to the Home Office and online desk research, we have developed in-depth understanding of the role of private companies in the Electronic Monitoring system set up by the Ministry of Justice and used by the Home Office to track migrants. We shared such information with a Guardian journalist to reveal the plans for facial recognition smartwatches provided by Buddi Limited. As a result, the Business and Human Rights Resource Centre wrote to Buddi Limited asking them about the impact of facial recognition smartwatches on migrants' human rights.
- Late in 2022, PI submitted suggested amendments to the EU Platform Workers Directive. The current Parliament version of the document includes recommendations made by PI. The text has now entered trialogue and will likely be discussed in 2023.
- The UK House of Lords Justice and Home Affairs committee's report on use of technologies in justice system cited PI's submission and our Public Private Partnerships Safeguards, and used our framing to question ministers about the issues that arise in misuse of new technology. The proposed recommendations also reflect PI's positions and calls for transparency, accountability and establishment of oversight bodies.

Related Impact stories

UN Security Council accepts language on human rights in counter-terrorism.

The Delhi Declaration on countering the use of new and emerging technologies for terrorist purposes adopted by the UN Security Council Counter Terrorism Committee on 29 October 2022 contained some references to human rights issues we advocated for with the UN Security Council's members and at the preparatory technical sessions and at the special session in New Delhi.

Diet app Noom we investigated changed its data sharing practices.

Following our research, the popular diet app implemented a series of changes on their website and in their data sharing practices. One important change was that Noom introduced a cookie consent banner, and stopped sharing personal data with some of the identified third parties. Although we don't have concrete proofs of causality, the fact that Noom adjusted problematic aspects flagged in our research, after publication and dissemination of the research about them, allows us to state the contribution to the produced change.

Google gave power to people to opt-out of weight-related apps.

Google added "weight loss" as a sensitive Ad category that users can opt-out of. The settings will apply on all Google services in Google's Display network which includes more than 2 million

websites, videos, and apps. This was one of the main demands PI advocated for following our Diet Ads research and allows users to avoid being targeted with these types of advertisements.

Better regulation of Mobile Phone Extraction in the UK.

The UK Government's code of practice on Extraction of Information from electronic devices includes recommendations from our response to the consultation on the Code. The new Code of Practice makes clear that regardless of the purpose, there must be no presumption that information will be extracted from a device. Further, the code states that other less intrusive means of obtaining information must be considered. It also includes a set of additional documents to be provided in the written notice to the person who is the subject of extraction for increased transparency.

We engage to amplify change

Through strategic engagement with over 100 stakeholders across the world, including civil society organisations, development organisations, academics, journalists, and special rapporteurs, we expand the reach of our advocacy. We define a result as when another actor engages on our issues; and an impact is when coordinated action leads to a scalable result in the field (against a target, a system, or to assist affected people).

Related Results

- Following our input, the WHO's guidance on Ethics and Governance of Artificial Intelligence for Health integrated many of the issues we were concerned about and our recommendations. We were also requested to provide feedback on the WHO's educational materials on AI and healthcare – developed for health officials and system designers. Based on our suggestions, the WHO amended their draft educational modules to include explicit mentions to human rights assessments, the need for training of healthcare professionals in privacy and data protection, and the need for safeguards in AI, as suggested by PI.
- Eticas Foundation replicated PI's research into privacy and period-tracking apps and presented the results in their report. The research expanded on PI's work by looking at apps that PI had not previously assessed and further contributed to amplification of PI's demands.
- PI's investigative work into the Southern Co-Op's use of Facewatch's facial recognition system motivated Big Brother Watch to launch a targeted campaign and file a complaint with the UK regulator.
- The UN Special Rapporteur on extreme poverty report "Non-take-up of rights in the context of social protection", replicated many of the positions articulated by PI in relation to i) additional hurdles imposed in the form of fraud-detection mechanisms; ii) actual or suspected data-sharing acting as a deterrent for people to seek access to welfare; iii) the impact of imposing ID as a requirement to access benefits; and iv) the limits of automation and digitisation. The report referenced PI, and it explicitly highlighted one of the examples raised by PI both in its submission to the UNSR and its Covid-19 welfare benefits research concerning Jordan's data-sharing practices arising from its Covid-19 emergency cash transfer.

Related Impact stories

Data protection and privacy are recognised as part of the election observation process.

Following PI's collaboration with the Carter Center, data protection and privacy observations were officially integrated into the Carter Center's Preliminary report on the Presidential elections in Kenya. PI joined the Carter Center in Kenya as part of a pre-election assessment team in July 2022 to identify and explore data protection issues around the elections. This was one of the first substantial analyses of data protection and privacy legislation and the use of technology in the Kenyan election.

PI's contribution towards protection of elections was recognised by key players in the field.

Following our work on protection against use of technology in the elections, PI was invited and attended the Declaration of Principles for International Election Observation Implementation Meeting held at the European Parliament in December 2022. PI was the only CSO not directly connected with the area invited to the meeting, where electoral observers from across the world and representatives of international organisations discussed the crucial role of election observation in defending democracy and best practices on elections observation. We presented our work as part of the panel "Implementing Observation Principles for Online Campaigns, Navigating Ongoing Threats, and Protecting Fundamental Freedoms", presenting various aspects of our work including an overview of the Technology and Elections Checklist and overview of International Election Monitoring Standards. The panel was attended by 50 people from 15 international and regional electoral observation organisations. As a result, PI was approached by various participants expressing interest in our work and collaboration – for example, we were approached by the Election Observation and Democracy Support to organise a training for election observers.

We strengthen the field

The global protection of privacy relies on effective and sustained national, regional and international advocacy. We define a result as when there is recognition of the value of our capacitation and knowledge-sharing. An impact is defined as when the field is directly strengthened by PI and partners, seeding the grounds for future action and protection.

Related Results

- PI supported partner organisations in their engagement with UN bodies, which consolidated their capacity to engage with global and regional bodies (ADC, Karisma, CIS, InternetLab, Derechos Digitales). For example, as a result of our direct support, PI's Argentinian partner ADC was selected by UPR Info, out of all the applications to the Universal Periodic Review (UPR), to present a briefing on their submissions before the UPR review at the UPR-Info Pre-session in January 2023. PI extensively supported ADC in development of the submission and engagement with the UN UPR process.
- PI's work on the impact of ID systems on transgender people in Argentina, France and the Philippines informed and was referenced in the submission made by the School of Data Science at the University of Virginia to the White House Office of Science and Technology Policy (OSTP), in relations to "shortcomings of ID data for gender diverse communities".

Privacy International

Trustees' annual report

For the year ended 31 January 2023

- Based on our period-tracking apps research, PI was asked to participate in an academic review process of a draft submission for Latin-American journal "Sexualidad, Salud y Sociedad".
- Good practice initiative for cookie consent management implemented a guide developed by ConPolicy Institute, with funding from the German Federal Ministry of Justice and Consumer Protection (BMJV) included the proposals suggested by PI. The document includes a collection of good practices and recommendations for action on consumer-friendly, legal and practicable cookie consent for German and European companies.
- The Brazilian AI Commission's report and a Draft AI law cites our submission as an influence on the inclusion of mandatory Human Rights Impact Assessments in relation to the use of AI. The report that will serve as the starting point for deliberations by the Senate on new AI legislation.
- PI was invited by the United Nations Office for the Coordination of Humanitarian Affairs to contribute to the development of a guidance note to provide an overview of common threats to data security and vulnerabilities in operational data management. The final version integrates many of the issues PI put forward in terms of ensuring a comprehensive approach to threat identification and management for humanitarian organisations which considers current government surveillance and corporate exploitation practices and policies.

Related Impact stories

PI demands for human rights provisions are reflected in the UN cybercrime treaty.

The UN started negotiations of the international Cybercrime Treaty – a comprehensive international convention on countering the use of information and communications technologies for criminal purposes. As many current cybercrime laws, policies and practices can undermine human rights, we've been actively advocating for appropriate human rights safeguards in the cybercrime regulations. As a result of our advocacy, the UN cybercrime treaty incorporates clear human rights provisions.

EU asks for sustainable security of mobile devices.

The European Commission's proposal for the Cyber Resilience Act included a provision on 5-year support duration standard for support duration of devices. This largely reflects PI's comments to the consultations and demands articulated during the meetings with the Commission officials emphasising the need for long term software support.

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 increased slightly to £2.1m (2021/2022: £1.9m) mostly as a result of changes to staff costs and a very slow return to more regular level of activities, as the organisation and its allies kept recovering and re-adjusting the intensity of work in the ongoing global health emergency.

The incoming resources for the year were £2.02m (2021/2022: £2.28m) – the income in 2022/2023 reflects ongoing multi-year grant agreements in support of the current organisational strategy (2018–2022).

The total funds of the charity at the end of the year were £2.8m. This included £481k in project and other restricted funds and £2.3m in unrestricted funds. The trustees have set aside £1.61m of unrestricted funds as designated funds for delivery of current strategic objectives, projects and activities. The Trustees expect this designated fund to be fully utilised by January 2024. There is also £34k of designated fixed assets funds. The remaining £694k are general funds held for operational working capital requirements to address financial risks surrounding income and expenditure in line with the reserves policy set out below.

Principal risks and uncertainties

Changes in funding environment and shifts due to ongoing multiple global crises and economic uncertainties have potentially positive and negative consequences for PI: while the funding space is shrinking, PI's relevance and expertise continues to be very valued by existing institutional funders. PI recognises the ongoing global crises could cause funders to divert funding to other causes, and we are monitoring these shifts closely. See risk statement below for further information.

Reserves policy and going concern

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 unrestricted and undesignated reserves equivalent to 6 months' running costs – resulting in a target of £750k (currently: £694k, constituting 5.2 months of operational costs, representing the amount of general reserves not designated or otherwise committed to activity expenditure in FY 2023/2024).

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.

After making appropriate enquiries, the Trustees have a reasonable expectation that the company has adequate resources to continue in operational existence for the foreseeable future. For this reason, they continue to adopt the going concern basis in preparing the financial statements.

Fundraising

PI is working hard to ensure that PI's work is independent, cutting-edge and can be sustained for years to come. As a result, PI's work is funded by a variety of different sources. We do not accept funding from corporations because we believe that it would jeopardise the independence of our activities. We do not work with specialist fundraising service providers and fundraising is conducted by PI staff to maintain our high standards. We have also developed a due diligence process to investigate suspect donations and deal with them accordingly.

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Main sources of funding for PI are multi-year grants (core support and project support alike) from a small number of big institutional donors. Public donations remain around 1% of overall annual income, which Privacy International continues to work to change with the goal of diversifying the funding to move away from high dependency on limited number of donors.

In our public fundraising we strive for the highest standards. We do not participate in fundraising and marketing tactics that we see as privacy intrusive, such as highly targeted behavioural advertising. Furthermore, we go beyond the minimum standards laid out in GDPR and have our supporter platform set up so supporters have control over their data, including being able to stop communications and withdraw consent whenever they want.

In 2022/2023 we did not receive any complaints.

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

- Ford Foundation
- Luminate
- Oak Foundation
- Open Society Foundations
- Paul Hamlyn Foundation
- Swedish International Development Cooperation Agency.

Volunteers and pro bono support

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, Brick Court Chambers, Garden Court Chambers, Doughty Street Chambers, Bhatt Murphy, Liberty, Hausfeld & Co LLP, Linklaters, Leigh Day, Covington & Burling LLP, independent counsel, and various university departments, law clinics and legal experts at the Harvard Law School Cyberlaw Clinic and the University of Buffalo Law School Clinic.

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.

Plans for the future

2022 is the last year of PI's current strategic plan. PI Board and staff spent 2022 developing a new multi-year strategy and strategic plan, which was reviewed and approved by the Board in December 2022.

The Strategy 2023–2026 recognises:

- context: global crises and instability
- evaluation: degradation of institutions that we rely upon to create change, e.g. courts, regulators, media
- strategy: a continued focus on impact and system change

- urgency: ensuring affected populations and other beneficiaries have access to protections and can amplify change
- build: support other change agents with open methodologies (including tech research), education programming, while strengthening PI's capacity to reach audiences.

The new strategy states that we must build a sustainable PI that is capable of creating meaningful system change, genuinely engaging and protecting people, and openly amplifying and scaling impact; by staff who are supported to learn and grow to become effective advocates.

Structure, governance and management

The organisation is a charitable company limited by guarantee, incorporated on 16 January 2002 and registered as a charity on 26 May 2012.

The company was established under a memorandum of association which established the objects and powers of the charitable company and is governed under its articles of association.

All trustees give their time voluntarily and receive no benefits from the charity. Any expenses reclaimed from the charity are set out in note 6 to the accounts.

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. The Board of Trustees delegates day-to-day management of the charity to the Executive Director.

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.

PI reviews and updates its risk framework and risk register on a regular basis from which the Board considers the following risks with the greatest overall potential impact on PI as at the date of signing the Accounts.

1. Ongoing multiple global crises might make PI's work seem less relevant to stakeholders and beneficiaries.

This is not a period of institutional stability. Ensuring our work is relevant and effective amidst tumults was and continues to be essential, particularly as we develop and implement a new strategy. A badly designed strategy and poor planning mean PI could get distracted by other developments in the world and not deliver on the achievable strategy and meaningful change. We are already seeing a shift of focus for policy makers and funders to meet emerging challenges, fund specific urgent interventions and to 'work with affected populations/communities'. With many new actors entering the sector, there is a risk that attention and resources move away from existing commitments and effective tactics. Whilst we do not want to undermine more pressing sectoral work by prioritising our own topics, we have to ensure our work is focused on our strategic aims, we remain relevant and our methodologies remain robust and impact driven. Finally, creating meaningful change in this environment is getting harder. Companies and government agencies are increasingly ignoring attempts to engage and we are worried that public pressure is insufficient. Our latest experiences seem to confirm that only substantially grounded legal tools and interventions appear to compel the desired changes of behaviours. This is hazardous for future advocacy, as legal interventions, when possible, are resource intensive. Such interventions also require institutions such as regulatory and judicial bodies to exist, prioritise our concerns, and for rulings to be heeded.

What is PI doing about it?

The Executive Director, with the support of the strategy team, engages regularly with current PI funders to make sure they have in-depth understanding of and commitment to issues the sector is tackling and facing. PI also regularly reviews the strategic developments of current and potential funders and keeps exploring other funders in the domain.

An independent external evaluation in 2022 confirmed that our careful and flexible selection of achievable interventions are relevant and achieve impact. While this supports the continuation of this approach into our new strategic plan, more contextual analyses and systems-thinking will inform our future planning processes. We also continue to actively engage with donors on why PI's careful methods and tactics are more effective at achieving results, rather than than ad hoc tactics used by others.

We continue to innovate and explore areas of work in pioneering ways in consultative manners. Our approach is to cooperate (not compete) with and support other actors. As we plan our interventions we consult beneficiaries and stakeholders to understand and incorporate their perspectives. We also constantly monitor how PI work responds to beneficiaries' needs, meeting our commitments and progress towards agreed vision and change. The 2022 evaluation confirmed that we have a positive track record; we continue to learn how to do this meaningfully.

2. Adversarial action by state and other actors against civil society (PI and partners)

As a result of our work, or work of our partners in cooperation with us, another entity (state, corporate or other actors) could take legal action against PI, e.g. challenging claims we make in public statements. This could expose PI to significant litigation and financial costs (in forms of legal costs and potential damages). Not being able to protect the organisation's reputation and integrity could cause loss of trust by the public, our supporters and funders and subsequent loss of significant resources.

The current climate against involving "foreign agents" in the US and other jurisdictions, creates onerous regulations for NGOs like PI who seek to do international work. The growing body of foreign agent and national security legislation makes working in certain environments more difficult and risky (US, UK, EU, Russia, China, Kenya, India, MENA/Gulf countries). Actions taken against PI's partners can also have a significant negative impact on delivery of project activities and on meeting our commitments to beneficiaries and donors.

What is PI doing about it?

PI regularly reviews our internal processes in the form of consolidated guidance on research protocols, which are now deployed and staff instructed – the robust risk handbook and assessment is in place for all various stages of research process and project management. All staff also receive annual training in legal and research-related risks. As an organisation, we also assure legal capacity is available across organisation to assist with risk assessment on all projects, including pro-bono and paid for external legal counsel.

We also regularly monitor new and planned foreign agent laws and in-depth risk assessment is required prior to potential engagement in any country with such laws. PI's partner organisations are also required to undergo a risk assessment and thorough due diligence process, to assess and assure their preparedness to undertaking activities in cooperation with PI.

3. Insufficiently diverse or unsustainable sources of funding

While cash-secure at the end of the fiscal year, PI remains highly reliant on limited number of funders – our most substantive long-term support comes from 2-3 institutional funders, and PI is vulnerable to their internal politics and strategic changes. The board recognised the lack of flexibility in funding might result in limited resources to respond to unexpected project developments and/or crisis situations. As mentioned above, the global situation continues to deteriorate and donors' attention and their resources could be easily re-directed to other pressing topics and matters.

What is PI doing about it?

The Executive Director, with the support of the strategy team, engages regularly with current PI funders, not only as it relates to financial support but also to make sure they have in-depth understanding of and commitment to issues the sector is tackling and facing. PI also regularly reviews the strategic developments of current and potential funders and keeps exploring other funders in the domain. The executive team also provides regular updates to the Finance and Audit Committee and Board of Trustees, and invites them to engage with donors, where needed. We also continue to build infrastructure and processes to increase income from the public.

4. Organisational health and staff wellbeing in post global pandemic environment

We are transitioning to our new strategic plan in a climate of significant external pressures. Economic pressures are affecting staff negatively. This poses risks to staff's health and wellbeing; and PI's ability to deliver.

Maintaining staff morale remains challenging. Introducing new human resources procedures and testing new work practices in this environment was hard but necessary. 2022 was the first year where we tested full cycle of the new performance management system, which was aligned with the revised competencies framework.

What is PI doing about it?

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.

We conducted extensive consultations with staff throughout the year, particularly as we developed the new strategic plan.

In order to most effectively support our staff as we change to deliver the next strategic plan, we are updating our HR policies and expanding our wellbeing and training programmes to include:

- coaching as part of available counselling schemes
- change management training
- (planned) psychological safety workshops
- (planned) manager training and support to effectively guide staff.

We will be conducting an audit of our wellbeing programme in 2023 to update it to best sector standards.

We are keeping a close eye on increasing concerns around recessions globally and cost of living crises, and the board is regularly updated by the executive team on how to respond.

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 revised in late 2021 and applies to all employees, volunteers and contractors, both in the UK and overseas.

Appointment of trustees

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.

Trustee induction and training

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.

Remuneration policy for key management personnel

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.

Statement of responsibilities of the trustees

The trustees (who are also directors of Privacy International for the purposes 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 the 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:

- Select suitable accounting policies and then apply them consistently
- Observe the methods and principles in the Charities SORP
- Make judgements and estimates that are reasonable and prudent

- State whether applicable UK Accounting Standards and statements of recommended practice have been followed, subject to any material departures disclosed and explained in the financial statements
- Prepare the financial statements on the going concern basis unless it is inappropriate to presume that the charity will continue in operation

The trustees are responsible for keeping adequate accounting records that 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. 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.

In so far as the trustees are aware:

- There is no relevant audit information of which the charitable company's auditor is unaware
- 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

The trustees are responsible for the maintenance and integrity of the corporate and financial information included on the charitable company's website. Legislation in the United Kingdom governing the preparation and dissemination of financial statements may differ from legislation in other jurisdictions.

Members of the charity guarantee to contribute an amount not exceeding £1 to the assets of the charity in the event of winding up. The total number of such guarantees at 31 January 2023 was 11 (2021/2022: 11). The trustees are members of the charity but this entitles them only to voting rights. The trustees have no beneficial interest in the charity.

Auditor

Sayer Vincent LLP was re-appointed as the charitable company's auditor during the year and has expressed its willingness to continue in that capacity.

The trustees' annual report has been approved by the trustees on 27 September 2023 and signed on their behalf by:

Joshua Castellino
Chair of the Board

Independent auditor's report to the members of

Privacy International

For the year ended 31 January 2023

Opinion

We have audited the financial statements of Privacy International (the 'charitable company') for the year ended 31 January 2023 which comprise the statement of financial activities, balance sheet, statement of cash flows and notes to the financial statements, including significant accounting policies. The financial reporting framework that has been applied in their preparation is applicable law and United Kingdom Accounting Standards, including FRS 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 2023 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
- 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 Auditor's 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 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 Privacy International'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.

Independent auditor's report to the members of

Privacy International

For the year ended 31 January 2023

Other Information

The other information comprises the information included in the trustees' annual report, other than the financial statements and our auditor's report thereon. The trustees are responsible for the other information contained within the annual report. 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. 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 course of 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 this gives rise to a material misstatement in the financial statements themselves. 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.

Opinions on other matters 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' annual report, for the financial year for which the financial statements are prepared is consistent with the financial statements; and
- The trustees' annual report, has been prepared in accordance with applicable legal requirements.

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 trustees' annual report. We have nothing to report in respect of the following matters in relation to which the Companies Act 2006 requires us to report to you if, in our opinion:

- Adequate 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 directors were not entitled to prepare the financial statements in accordance with the small companies regime and take advantage of the small companies' exemptions

Independent auditor's report to the members of

Privacy International

For the year ended 31 January 2023

in preparing the trustees' annual report and from the requirement to prepare a strategic report.

Responsibilities of trustees

As explained more fully in the statement of trustees' responsibilities set out in the trustees' annual report, 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 is 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 are set out below.

Capability of the audit in detecting irregularities

In identifying and assessing risks of material misstatement in respect of irregularities, including fraud and non-compliance with laws and regulations, our procedures included the following:

Independent auditor's report to the members of

Privacy International

For the year ended 31 January 2023

- We enquired of management and Finance and Audit committee, which included obtaining and reviewing supporting documentation, concerning the charity's policies and procedures relating to:
 - Identifying, evaluating, and complying with laws and regulations and whether they were aware of any instances of non-compliance;
 - Detecting and responding to the risks of fraud and whether they have knowledge of any actual, suspected, or alleged fraud;
 - The internal controls established to mitigate risks related to fraud or non-compliance with laws and regulations.
- We inspected the minutes of meetings of those charged with governance.
- We obtained an understanding of the legal and regulatory framework that the charity operates in, focusing on those laws and regulations that had a material effect on the financial statements or that had a fundamental effect on the operations of the charity from our professional and sector experience.
- We communicated applicable laws and regulations throughout the audit team and remained alert to any indications of non-compliance throughout the audit.
- We reviewed any reports made to regulators.
- We reviewed the financial statement disclosures and tested these to supporting documentation to assess compliance with applicable laws and regulations.
- We performed analytical procedures to identify any unusual or unexpected relationships that may indicate risks of material misstatement due to fraud.
- In addressing the risk of fraud through management override of controls, we tested the appropriateness of journal entries and other adjustments, assessed whether the judgements made in making accounting estimates are indicative of a potential bias and tested significant transactions that are unusual or those outside the normal course of business.

Because of the inherent limitations of an audit, there is a risk that we will not detect all irregularities, including those leading to a material misstatement in the financial statements or non-compliance with regulation. This risk increases the more that compliance with a law or regulation is removed from the events and transactions reflected in the financial statements, as we will be less likely to become aware of instances of non-compliance. The risk is also greater regarding irregularities occurring due to fraud rather than error, as fraud involves intentional concealment, forgery, collusion, omission or misrepresentation.

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

Independent auditor's report to the members of

Privacy International

For the year ended 31 January 2023

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 auditor's 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.

Noelia Serrano (Senior statutory auditor)

9 October 2023

for and on behalf of Sayer Vincent LLP, Statutory Auditor
Invicta House, 108-114 Golden Lane, LONDON, EC1Y 0TL

Privacy International

Statement of financial activities (incorporating an income and expenditure account)

For the year ended 31 January 2023

		2023			2022		
	Note	Unrestricted £	Restricted £	Total £	Unrestricted £	Restricted £	Total £
Income from:							
Donations and legacies		27,755	–	27,755	18,088	–	18,088
Charitable activities	2	1,361,570	605,029	1,966,599	1,437,843	808,924	2,246,767
Other income		20,242	–	20,242	12,709	–	12,709
Investments		1,156	–	1,156	152	–	152
Total income		1,410,723	605,029	2,015,752	1,468,791	808,924	2,277,715
Expenditure on:							
Charitable activities	3	1,334,892	766,153	2,101,045	1,377,034	526,744	1,903,778
Total expenditure		1,334,892	766,153	2,101,045	1,377,034	526,744	1,903,778
Net income / (expenditure) for the year	5	75,831	(161,124)	(85,293)	91,757	282,180	373,937
Transfers between funds	14	831	(831)	–	11,212	(11,212)	–
Net movement in funds		76,662	(161,955)	(85,293)	102,969	270,968	373,937
Reconciliation of funds:							
Total funds brought forward		2,258,310	643,033	2,901,343	2,155,341	372,065	2,527,406
Total funds carried forward		2,334,972	481,078	2,816,050	2,258,310	643,033	2,901,343

All of the above results are derived from continuing activities. There were no other recognised gains or losses other than those stated above. Movements in funds are disclosed in Note 14a to the financial statements. □

Privacy International

Balance sheet

Company no. 4354366

As at 31 January 2023

		2023		2022	
	Note	£	£	£	£
Fixed assets:					
Tangible assets	10		33,516		55,868
			<u>33,516</u>		<u>55,868</u>
Current assets:					
Debtors	11	98,230		60,740	
Cash at bank and in hand		2,800,469		2,881,825	
		<u>2,898,699</u>		<u>2,942,565</u>	
Liabilities:					
Creditors: amounts falling due within one year	12	(116,165)		(97,090)	
			<u>2,782,534</u>		<u>2,845,475</u>
Net current assets					
			<u>2,816,050</u>		<u>2,901,343</u>
Total net assets					
			<u>2,816,050</u>		<u>2,901,343</u>
The funds of the charity:					
Restricted income funds	14a		481,078		643,033
Unrestricted income funds:					
Designated funds		1,640,722		1,635,444	
General funds		694,250		622,866	
		<u>2,334,972</u>		<u>2,258,310</u>	
Unrestricted general funds			<u>2,334,972</u>		<u>2,258,310</u>
Total charity funds			<u>2,816,050</u>		<u>2,901,343</u>

Approved by the trustees on 27 September 2023 and signed on their behalf by

Professor Joshua Castellino
Trustee

Privacy International

Statement of cash flows

For the year ended 31 January 2023

	2023		2022	
	£	£	£	£
Cash flows from operating activities				
Net income for the reporting period (as per the statement of financial activities)	(85,293)		373,937	
Depreciation charges	32,262		33,651	
Dividends, interest and rent from investments	(1,156)		(152)	
(Increase) in debtors	(37,490)		1,498	
Increase in creditors	19,075		27,195	
Net cash provided by operating activities		(72,602)		436,129
Cash flows from investing activities:				
Dividends, interest and rents from investments	1,156		152	
Purchase of fixed assets	(9,910)		(11,161)	
Net cash (used in) investing activities		(8,754)		(11,009)
Change in cash and cash equivalents in the year		(81,356)		425,120
Cash and cash equivalents at the beginning of the year		2,881,825		2,456,705
Cash and cash equivalents at the end of the year		2,800,469		2,881,825

Analysis of cash and cash equivalents and of net debt

	At 1 February 2022 £	Cash flows £	Other non- cash changes £	At 31 January 2023 £
Cash at bank and in hand	2,881,825	(81,356)	-	2,800,469
Total cash and cash equivalents	2,881,825	(81,356)	-	2,800,469

1 Accounting policies

a) Statutory information

Privacy International is a charitable company limited by guarantee and is incorporated in England & Wales. The registered office address and principal place of business is 62 Britton Street, London, EC1M 5UY.

b) Basis of preparation

The financial statements have been prepared in accordance with 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) – (Charities SORP FRS 102), The Financial Reporting Standard applicable in the UK and Republic of Ireland (FRS 102) and the Companies Act 2006/Charities Act 2011.

Assets and liabilities are initially recognised at historical cost or transaction value unless otherwise stated in the relevant accounting policy or note.

In applying the financial reporting framework, the trustees have made a number of subjective judgements, for example in respect of significant accounting estimates. Estimates and judgements are continually evaluated and are based on historical experience and other factors, including expectations of future events that are believed to be reasonable under the circumstances. The nature of the estimation means the actual outcomes could differ from those estimates. Any significant estimates and judgements affecting these financial statements are detailed within the relevant accounting policy below.

c) Public benefit entity

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

d) 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.

e) Income

Income is recognised when the charity has entitlement to the funds, any performance conditions attached to the income have been met, it is probable that the income will be received and that the amount can be measured reliably.

Income from government and other grants, whether 'capital' grants or 'revenue' grants, is recognised when the charity has entitlement to the funds, any performance conditions attached to the grants have been met, it is probable that the income will be received and the amount can be measured reliably and is not deferred.

f) Donations of gifts, services and facilities

Donated professional services and donated facilities are recognised as income when the charity has control over the item or received the service, any conditions associated with the donation have been met, the receipt of economic benefit from the use by the charity of the item is probable and that economic benefit can be measured reliably. In accordance with the Charities SORP (FRS 102), volunteer time is not recognised so refer to the trustees' annual report for more information about their contribution.

On receipt, donated gifts, professional services and donated facilities are recognised on the basis of the value of the gift to the charity which is the amount the charity would have been willing to pay to obtain services or facilities of equivalent economic benefit on the open market; a corresponding amount is then recognised in expenditure in the period of receipt.

1 Accounting policies (continued)

g) Interest receivable

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.

h) Fund accounting

Restricted funds are to be used for specific purposes as laid down by the donor. Expenditure which meets these criteria is charged to the fund.

Unrestricted funds are donations and other incoming resources received or generated for the charitable purposes.

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

i) Expenditure recognition

Expenditure is recognised once there is a legal or constructive obligation to make a payment to a third party, it is probable that settlement will be required and the amount of the obligation can be measured reliably. Irrecoverable VAT is charged as a cost against the activity for which the expenditure was incurred. Expenditure is classified under the following activity headings:

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. Irrecoverable VAT is charged as a cost against the activity for which the expenditure was incurred.

Allocation of support costs

Support costs are allocated to the charity's charitable activities.

Governance costs are the costs associated with the governance arrangements of the charity. These costs are associated with constitutional and statutory requirements and include any costs associated with the strategic management of the charity's activities.

1 Accounting policies (continued)

j) 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.

Depreciation is provided at rates calculated to write down the cost of each asset to its estimated residual value over its expected useful life. The depreciation rates in use are as follows:

● Software	33% on cost
● Computer equipment	50% on cost
● Furniture & fixtures	25% on cost
● Leasehold improvements	20% on cost

k) Debtors

Trade and other debtors are recognised at the settlement amount due after any trade discount offered. Prepayments are valued at the amount prepaid net of any trade discounts due.

l) Cash at bank and in hand

Cash at bank and cash in hand includes cash and short term highly liquid investments with a short maturity of three months or less from the date of acquisition or opening of the deposit or similar account.

m) Creditors and provisions

Creditors and provisions are recognised where the charity has a present obligation resulting from a past event that will probably result in the transfer of funds to a third party and the amount due to settle the obligation can be measured or estimated reliably. Creditors and provisions are normally recognised at their settlement amount after allowing for any trade discounts due.

n) Financial instruments

The charity only has financial assets and financial liabilities of a kind that qualify as basic financial instruments. Basic financial instruments are initially recognised at transaction value and subsequently measured at their settlement value.

o) 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.

Privacy International

Notes to the financial statements

For the year ended 31 January 2023

2 Income from charitable activities

	2023			2022		
	Unrestricted £	Restricted £	Total £	Unrestricted £	Restricted £	Total £
Grants						
Foundation to Promote Open Society	-	-	-	540,541	-	540,541
Oak Foundation	263,412	-	263,412	261,038	787,862	1,048,900
Luminate	870,831	-	870,831	503,446	2,245,108	2,748,554
Ford Foundation BUILD	211,037	-	211,037	109,318	-	109,318
Donated in-kind services	16,290	-	16,290	23,500	-	23,500
Ford Foundation	-	-	-	-	153,328	153,328
Ford Foundation BUILD	-	140,691	140,691	-	72,879	72,879
Foundation to Promote Open Society – Eurasia□	-	-	-	-	37,347	37,347
The Swedish International Development Cooperation Agency – Core support□	-	434,906	434,906	-	-	-
The Swedish International Development Cooperation Agency – project grant	-	(28,568)	(28,568)	-	487,370	487,370
Paul Hamlyn Foundation	-	58,000	58,000	-	58,000	58,000
	1,361,570	605,029	1,966,599	1,437,843	3,841,894	5,279,737

3a Analysis of expenditure (current year)

	Charitable Activities £	Governance costs £	Support costs £	2023 Total £	2022 Total £
Staff costs (Note 6)	1,372,227	-	-	1,372,227	1,267,775
Other staff related costs	31,320	-	-	31,320	30,536
Grants to partners (note 4)	234,503	-	-	234,503	232,269
Project expenses	62,863	-	-	62,863	27,107
Rent	-	-	83,397	83,397	85,416
Depreciation	-	-	33,411	33,411	33,651
Consultancy	90,252	-	9,073	99,325	51,782
Trustee expenses	2,866	-	-	2,866	-
Audit	-	10,260	-	10,260	22,320
(Gains) on foreign exchange	(65)	-	-	(65)	61
Office expenses	-	-	99,703	99,703	104,401
Legal and professional fees	10,391	-	16,290	26,681	32,955
Travel and accommodation	31,082	-	-	31,082	528
Translation	11,417	-	-	11,417	12,312
Other costs	-	13	2,043	2,056	2,665
	<u>1,846,855</u>	<u>10,273</u>	<u>243,916</u>	<u>2,101,045</u>	<u>1,903,778</u>
Support costs	243,916	-	(243,916)	-	-
Governance costs	10,273	(10,273)	-	-	-
Total expenditure 2023	<u>2,101,045</u>	<u>-</u>	<u>-</u>	<u>2,101,045</u>	
Total expenditure 2022	<u>1,903,778</u>	<u>-</u>	<u>-</u>		<u>1,903,778</u>

3b Analysis of expenditure (prior year)

	Charitable Activities £	Governance costs £	Support costs £	2022 Total £	2021 Total £
Staff costs (Note 6)	1,267,775	-	-	1,267,775	1,140,978
Other staff related costs	30,536	-	-	30,536	14,110
Grants to partners (note 4)	232,269	-	-	232,269	345,598
Project expenses	27,107	-	-	27,107	37,405
Rent	-	-	85,416	85,416	85,346
Depreciation	-	-	33,651	33,651	35,871
Consultancy	51,782	-	-	51,782	50,501
Trustee expenses	-	-	-	-	8,181
Audit	-	22,320	-	22,320	13,380
(Gains) on foreign exchange	61	-	-	61	-
Office expenses	-	-	104,401	104,401	97,240
Legal and professional fees	9,455	-	23,500	32,955	11,924
Travel and accommodation	528	-	-	528	6,094
Translation	12,312	-	-	12,312	7,488
Other costs	335	13	2,317	2,665	3,257
	<u>1,632,160</u>	<u>22,333</u>	<u>249,285</u>	<u>1,903,778</u>	<u>1,857,373</u>
Support costs	249,285	-	(249,285)	-	-
Governance costs	22,333	(22,333)	-	-	-
Total expenditure 2022	<u>1,903,778</u>	<u>-</u>	<u>-</u>	<u>1,903,778</u>	
Total expenditure 2021	<u>1,857,373</u>	<u>-</u>	<u>-</u>		<u>1,857,373</u>

4a Grant making to institutions

	2023 £	2022 £
Cost		
Asociación por los Derechos Civiles	19,000	12,900
The Centre for Internet and Society	15,923	18,572
Fundación Datos Protegidos	–	14,980
Corporación Centro De Estudios de Derecho, Justicia y Sociedad – Dejusticia	10,000	7,000
Derechos Digitales	4,000	–
Foundaiton for Media Alternatives	13,369	11,992
Haki Na Sheria	11,140	–
Hermes Center for Transparency and Digital Human	9,999	8,111
ICJ Kenya	45,105	–
Impetus	–	9,050
Internet Labs	9,000	–
Ipandetec	1,000	1,208
Fundación Karisma	31,526	17,772
Kenya Legal and Ethical issues network on HIV&AIDS	10,000	15,000
Defenders Coalition – Kenya	–	5,274
Social Media Exchange	–	11,784
The Libertarian Research & Education Trust	17,216	19,776
TEDIC	10,000	12,500
Unwanted Witness	5,000	19,465
Other	22,225	46,885
At the end of the year	<u>234,503</u>	<u>232,269</u>

Other grants include grants to partners below £5,000 in the year and also those organisations which need to remain anonymous due to sensitive nature of their work.

5 Net income / (expenditure) for the year

This is stated after charging / (crediting):

	2023 £	2022 £
Depreciation	33,411	33,651
Auditor's remuneration (gross of VAT):		
Audit	10,260	12,000
Other services	–	10,320
	<u> </u>	<u> </u>

6 Analysis of staff costs, trustee remuneration and expenses, and the cost of key management personnel

Staff costs were as follows:

	2023 £	2022 £
Salaries and wages	1,157,365	1,074,560
Social security costs	135,555	118,357
Employer's contribution to defined contribution pension schemes	79,307	74,859
	<u>1,372,227</u>	<u>1,267,776</u>

The following number of employees received employee benefits (excluding employer pension costs and employer's national insurance) during the year between:

	2023 No.	2022 No.
£60,000 – £69,999	1	–
£70,000 – £79,999	–	–
£80,000 – £89,999	1	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 £91,285 (2022: £89,495).

No remuneration was paid to any trustee or their associates for services as a trustee during the year ended 31 January 2023 nor to 31 January 2022.

During the year the charity paid trustees' travel expenses £2,866: (2022: nil).

7 Staff numbers

The average number of employees (head count based on number of staff employed) during the year was 25

8 Related party transactions

There are no related party transactions to disclose for this financial year (2022: none).

9 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.

10 Tangible fixed assets

	Leasehold improvements £	Software £	Computer equipment £	Furniture & fixtures £	Total £
Cost					
At the start of the year	107,315	3,645	65,913	21,273	198,146
Additions in year	-	-	8,635	2,423	11,058
Disposals in year	-	-	(1,149)	-	(1,149)
At the end of the year	107,315	3,645	73,399	23,696	208,055
Depreciation					
At the start of the year	66,139	3,645	54,226	18,267	142,277
Charge for the year	21,464	-	9,982	1,965	33,411
Eliminated on disposal	-	-	(1,149)	-	(1,149)
At the end of the year	87,603	3,645	63,059	20,232	174,539
Net book value					
At the end of the year	19,712	-	10,340	3,464	33,516
At the start of the year	41,176	-	11,687	3,006	55,868

All of the above assets are used for charitable purposes.

11 Debtors

	2023 £	2022 £
Rent deposit	15,478	15,478
Prepayments	63,408	45,262
Accrued income	19,344	-
	98,230	60,740

12 Creditors: amounts falling due within one year

	2023 £	2022 £
Trade creditors	13,444	10,433
Credit cards	3,767	2,573
Payroll taxes	29,861	31,046
Accruals	69,093	53,038
	116,165	97,090

13a Analysis of net assets between funds (current year)

	General unrestricted £	Designated £	Restricted £	Total funds £
Tangible fixed assets	-	33,516	-	33,516
Current assets	694,250	1,723,371	481,078	2,898,699
Current liabilities	-	(116,165)	-	(116,165)
Net assets at 31 January 2023	694,250	1,640,722	481,078	2,816,050

13b Analysis of net assets between funds (prior year)

	General unrestricted £	Designated £	Restricted £	Total funds £
Tangible fixed assets	-	55,868	-	55,868
Current assets	622,866	1,676,666	643,033	2,942,565
Current liabilities	-	(97,090)	-	(97,090)
Net assets at 31 January 2022	622,866	1,635,444	643,033	2,901,343

14a Movements in funds (current year)

	At 1 February 2022 £	Income & gains £	Expenditure & losses £	Transfers £	At 31 January 2023 £
Restricted funds:					
Ford Foundation	180,750	-	(166,245)	-	14,505
Ford Foundation BUILD	50,150	140,691	(95,252)	-	95,589
Foundation to Promote Open Society – Eurasia	33,345	-	(33,476)	131	-
Luminate	32,478	-	(32,461)	(17)	-
Paul Hamlyn Foundation	1,030	58,000	(58,680)	-	350
The Swedish International Development Cooperation Agency – Core support	315,752	434,906	(380,024)	-	370,634
The Swedish International Development Cooperation Agency – Project	29,528	(28,568)	(15)	(945)	-
Total restricted funds	643,033	605,029	(766,153)	(831)	481,078
Unrestricted funds:					
Designated funds:					
2024 Activity fund	1,579,576	-	(1,317,650)	1,345,280	1,607,206
Fixed asset fund	55,868	-	-	(22,352)	33,516
Total designated funds	1,635,444	-	(1,317,650)	1,322,928	1,640,722
General funds	622,866	1,410,723	(17,242)	(1,322,097)	694,250
Total unrestricted funds	2,258,310	1,410,723	(1,334,892)	831	2,334,972
Total funds	2,901,343	2,015,752	(2,101,045)	-	2,816,050

The narrative to explain the purpose of each fund is given at the foot of the note below.

14b Movements in funds (prior year)

	At 31 January 2021	Income & gains	Expenditure & losses	Transfers	At 31 January 2022
	£	£	£	£	£
Restricted funds:					
Ford Foundation	236,067	153,328	(208,645)	-	180,750
Ford Foundation BUILD	-	72,879	(22,729)	-	50,150
Foundation to Promote Open Society	9,574	-	1,638	(11,212)	-
Foundation to Promote Open Society - Eurasia	-	37,347	(4,002)	-	33,345
Luminate	45,417	-	(12,939)	-	32,478
Paul Hamlyn Foundation	-	58,000	(56,970)	-	1,030
The Swedish International Development Cooperation Agency - Core support	-	487,370	(171,618)	-	315,752
The Swedish International Development Cooperation Agency - project	81,007	-	(51,479)	-	29,528
Total restricted funds	372,066	808,923	(526,744)	(11,212)	643,033
Unrestricted funds:					
Designated funds:					
2024 Activity fund	-	-	-	1,579,576	1,579,576
Fixed asset fund	78,358	-	-	(22,490)	55,868
Total designated funds	78,358	-	-	1,557,086	1,635,444
General funds	2,076,983	1,468,791	(1,377,034)	(1,545,874)	622,866
Total unrestricted funds	2,155,341	1,468,791	(1,377,034)	11,212	2,258,310
Total funds	2,527,407	2,277,714	(1,903,778)	-	2,901,343

Purposes of restricted funds

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.

Ford Foundation

The Ford Foundation is a globally oriented private foundation with the mission of advancing human welfare. In late 2020 Privacy International received a 2 year-grant to support civil society in the Global South to investigate, advocate against and support civil society in understanding implications of developments around global and local responses to COVID-19, extended into late 2023. In October 2020 PI received a five-year general support grant, combined with targeted organizational strengthening through Ford Foundation BUILD program.

Foundation to Promote Open Society/OSF

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 September 2021 PI received a grant to explore our engagement in new geographical areas, with specific focus on civil society in Eurasia region.

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 mid-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 February 2021 PI received a 3-year grant to look into invasive data exploitation practices in immigration processes

The Swedish International Development Cooperation Agency/SIDA

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 January 2017 and completed in April 2021, aimed to strengthen civil society's capacity to protect the right to privacy, while confronting data-driven transformations in power. In June 2021 PI received from SIDA grant to support PI's strategy through to January 2025.

Purposes of designated funds

Activity fund

The 2024 activity fund represents funds set aside by the trustees in the 2021/22 and 2022/2023 financial years for delivery of strategic objectives, projects and activities. The Trustees expect the fund to be fully utilised by January 2024.

Fixed Asset fund

The fixed asset fund represents the net book value of fixed assets at year-end as these are not freely available for the charity's use.

15 Operating lease commitments payable as a lessee

The charity's total future minimum lease payments under non-cancellable operating leases is as follows for each of the following periods:

	Property 2023 £	2022 £
Less than one year	41,750	41,750
One to five years	-	-
Over five years	-	-
	<u>41,750</u>	<u>41,750</u>

16 Legal status of the charity

The charity is a company 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.

PRIVACY INTERNATIONAL

England & Wales - Charity number 1147471

Accounts

Company number: 4354366

Charity number: 1147471

Privacy International

Report and financial statements

For the year ended 31 January 2022

Privacy International

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Privacy International

Reference and administrative information

For the year ended 31 January 2022

Company number 4354366
Country of incorporation United Kingdom

Charity number 1147471
Country of registration England & Wales

Registered office and operational address 62 Britton Street, London, EC1M 5UY

Trustees Trustees, who are also directors under company law, who served during the year and up to the date of this report were as follows:

Eve Salomon	Resigned 30 June 2022
Peter Noorlander	Resigned 30 June 2022
Benjamin Elihu Wizner	
Susan Gardner	
Holly Marie Ruthrauff	
Stephen Josef Tibbett	
Antonio Michaelides	
Ahana Datta	Appointed 1 February 2021
Werbayne Ruthven McIntyre	Appointed 1 February 2021
Joshua Castellino	Appointed 1 February 2021
Amanda Borton	Appointed 1 February 2021

Bankers Barclays Bank
1 Churchill Place
London E14 5HP

Solicitors Covington & Burling
22 Bishopsgate
London EC2N 4BQ

Auditor Sayer Vincent LLP
Chartered Accountants and Statutory Auditor
Invicta House
108–114 Golden Lane
LONDON
EC1Y 0TL

Privacy International

Trustees' annual report

For the year ended 31 January 2022

The trustees present their report and the audited financial statements for the year ended 31 January 2022.

Reference and administrative information set out on page 1 forms part of this report. The financial statements comply with current statutory requirements, the memorandum and articles of association, the requirements of a directors' report as required under company law, and the Statement of Recommended Practice – Accounting and Reporting by Charities: SORP applicable to charities preparing their accounts in accordance with FRS 102.

Objectives and activities

Purposes and aims

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.

Governance of Privacy International (PI)'s activities

Privacy International's trustees review the aims, objectives and activities of the charity each year. This review also looks at what the charity has achieved and the outcomes of its work in the reporting period. The review also helps the trustees ensure the charity's aims, objectives and activities remained focused on its stated purposes.

The trustees have referred to the guidance contained in the Charity Commission's general guidance on public benefit when reviewing the charity's aims and objectives and in planning its future activities. In particular, the trustees consider how planned activities will contribute to the aims and objectives that have been set.

Privacy International sets multi-year strategies that the Trustees expect the organisation to deliver upon. Through annual planning of projects that contribute towards multi-year outcomes, the Trustees are able to monitor PI's delivery of its strategic priorities.

PI's current strategy spans 2019–2022. The priority for this strategy is for PI to become a resilient impact-oriented in pressing domains across the world. Those domains were identified as i) elections and civic spaces, ii) economic and social rights, iii) government exploitation of systems and data, and iv) corporate exploitation business models.

Each annual plan identifies within those domains the specific actors whose behaviours PI aims to change, the tactics and the indicators of achieving our results. These indicators are reviewed at every Trustee meeting, alongside the organisation's risk matrix.

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.

What Privacy International worked toward in 2021/2022 – focus of strategic areas

PI's **Strategic Area of Defending of Democracy and Dissent** investigates the role technology plays in facilitating and/or hindering everyone's participation in civic society. Ultimately, we fight to preserve the privacy, dignity, and autonomy of individuals so that they can exercise and defend their own rights and freedoms.

In 2021/2022 we continued to focus on:

- Protecting the Election Cycle – to counter exploitation of data in elections, we advocated for inclusion of our guidance into election observation methodology, engaged with international groups (Election Observation Advisory Committees) and in-field election observer missions, and explored and developed others' capacities in relation to use of new voting technologies.
- Resisting Civic Dystopias – to ensure that use of technologies by the police and governments agencies is clearly regulated and complies with human rights safeguards, we advocated for better regulations, intervened to illustrate harms of mobile phone extraction, advocated against massive increases in data aggregation in law enforcement agencies.
- Protecting Civic Spaces – to stop mass surveillance practices by governments, we worked to ensure laws or regulations were enacted or enforced to prevent human rights abuses by pursuing strategic court judgements, and by encouraging civil society mobilisation across

the world to research, advocate and educate people in relation to various surveillance technologies and practices.

Our **Strategic Area of Safeguarding People's Dignity** explores how people's access to public services are increasingly dependent on providing more and more data about themselves. This is of particular concern for people and communities who are disadvantaged within our socio-economic and political ecosystems. Innovative solutions can be designed to empower and serve individuals and communities, rather than state and corporate power.

In 2021/2022 we continued to focus on:

- **Protecting Identities** – to protect people in response to the deployment of expansive national ID systems, we supported key stakeholders across the world to articulate the risks of digital identity systems, together advocating that proponents and adopters design and implement systems that by default protect people and uphold the highest security standards.
- **Protecting Dignity** – to protect peoples' rights to access economic and social rights, we targeted government bodies and companies that are undermining and exploiting people's access through the use of technology and vast data processing practices, with specific focus on reproductive rights and welfare services, by promoting our standards at the international level.
- **A Humane Approach to Immigration** – to counter governments' increasing use of data against migrants, we supported expert migration-sector civil society organisations and others to integrate privacy and data issues into their programmes, and challenged public authorities to review and amend their data processing activities.

Our **Strategic Area of Government Exploitation** challenges how unprecedented surveillance capabilities of governments outstrip the safeguards for our rights. We are shining a light on the surveillance trade, exposing the companies, the buyers, and the impacts on human rights. We are advocating for good practices and strong laws that protect democracy and human rights worldwide.

In 2021/2022 we focused on:

- **Drivers of Surveillance** – to minimise the European Union's, the World Bank's, and the United Nation Security Council's more problematic financial and technical support of surveillance to governments across the world, we challenged their practices that undermine human rights protections, including by advocating before the relevant oversight and regulatory bodies.
- **Securing our Digital life** – to challenge and reduce the capacity of governments to conduct hacking and other forms of system exploitation that undermine human rights, we demanded companies strengthen privacy and security standards of their products, continued our litigation against government hacking, and engaged with relevant regulators and government bodies.
- **Public Private Surveillance Partnerships** – to make surveillance collaborations between governments and companies more transparent and grounded with robust and effective safeguards, we exposed, together with our partners, such partnerships, investigated and disclosed their conditions, and advocated for governments to adopt the standards

proposed by PI. We put pressure on governments, through public campaigning, to ban biometric mass surveillance (including live facial recognition) in public spaces.

PI's **Strategic Area of Corporate Exploitation** challenges how companies are innovating on surveillance capitalism, reducing people to data for exploitation. We are investigating how our data is generated and exploited, engaging the public, and exploring the necessary legal and technological frameworks to protect against data exploitation.

In 2021/2022 we focused on:

- **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 exploring data sharing practices, advocating for solutions that don't rely on intense data collection, and worked to educate the public to mobilise against pervasive and manipulative advertising.
- **Digital Data Dominance** – to prevent companies from expanding their data exploitation practices through acquisition, we educated regulators to better understand the interplay between data and competition, and advocated for stronger legal protections including at the EU.
- **Privacy Isn't A Luxury** – to ensure that security and privacy protections apply to everyone without regard to wealth, we pressured Google, Tecno, and the GSMA to ensure that low-cost mobile phone manufacturers globally protect their devices from security and privacy faults.
- **Corporate SOCMINT** – to ensure that privacy abusive business models are widely constrained and condemned we, together with partner organisations, explored private actors that deploy Facial Recognition Technologies (FRT) and forced regulators to initiate investigations and ban activity of those companies (Clearview AI) in various jurisdictions.
- **Workplace Surveillance** – to ensure that there are comprehensive regulatory frameworks that force employers to adopt necessary safeguards in their surveillance practices, we revealed abuses and harms, and publicly campaigned against the use of FRT and algorithmic management by Uber and mobilised others to promote our demands and join our campaign.

Our Network and Change

In 2021/2022 PI provided direct support to 18 partner organisations from 14 countries, to deepen their privacy-related work and enable them to effectively challenge governmental and private actors. As a result, partners should have been more capable to achieve specific outcomes at the national level.

PI's support was not limited to financial support. We also collaborated with partners and supported them by

- assisting in their projects
- building their accountability processes
- sharing standards, best practices, analysis and other knowledge resources

- providing with research and education materials and expertise, including research methodologies, review of briefs and statements
- supporting dissemination of created materials
- connecting to wider space of civil society outside their regions.

Beneficiaries of our services

Changes in practices and policies by governments and companies as a result of our work have benefited people globally, including as national publics and consumers. 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.

To ensure that we are achieving change that helps our beneficiaries, we track our activities through to results. Our activities include uncovering technological risks, leading global campaigns, intervening in courts, and motivating regulatory reform to prevent misuse of technology and consequent abuses. Through extensive outreach and media engagement, we ensure our work reaches expanded audiences across the world. These activities create pressure on governments and companies to improve their safeguards for people's benefit.

We also 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 2021/2022, we worked with 21 partner organisations in 18 countries -- including both organisations we support financially and through other support measures -- to better understand policy and technology, conduct outreach and public engagement, and strengthen their organisations. 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), and 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.

Achievements and performance

The charity's charitable activities focus on achieving change by strategically targeting our tech, legal and policy advocacy at governments and companies who are vying for power to determine the future to their advantage.

At PI we are focused on results and impact. These often come in the form of changes of behaviours of our targeted adversaries. An impact occurs when a result leaves a mark on the adversary, or the sector, or enhances protections for people. To verify that the tactics are integral to results, we group our results by tactic.

We Mobilise Allies Globally: key results in 2021/2022

Carefully coordinating work by multiple actors in multiple countries helps to achieve global change. This takes continuous relationship building. For us 'impact' is when our capacitation strengthens the sector and our collaboration affects the targeted adversaries.

Mobilisation Impact Stories

- *CSOs effectively targeted Clearview AI, the facial recognition firm.* Together with organisations from Austria, Greece, and Italy, we amplified our advocacy against the facial recognition firm with a legal campaign before national data protection regulators. As a result, authorities in Austria, France, Greece, Italy and the UK launched a series of investigations. Consequently, regulators in France, Italy and the UK ordered Clearview AI to stop collecting and processing the data of people in their countries and fined the firm millions of pounds.
- *New standards established to protect elections, through working with sector leaders.* In 2021 PI was collaborating with the Carter Center on the Myanmar election. While the coup derailed this resulting work, the Carter Center used our work to advocate for stronger data safeguards. This influential work is setting the ground for new standards in how elections are observed globally.
- *A tech-aware migration civil society sector capably addresses ongoing and future threats to migrants' rights.* In our 2021 work on migration, PI worked with at least 24 groups in the migration sector. Some of these were involved in our research and advocacy including on policing powers and GPS tracking; others benefitted from our capacity building events including on mobile phone extraction. We received positive feedback from these organisations, noting how we improved their awareness and interest in emerging data and technology related issues.
- *Partners force Kenyan government to include excluded populations.* Led by Haki Na Sheria and others, we helped put pressure on the Kenyan government to provide national ID cards to excluded individuals caught in a double registration problem – people registered as refugees despite also being Kenyan nationals. The Kenyan government was denying them the ability to register for a Kenyan national ID. This pressure contributed to the government's decision to issue around 14,000 IDs to double registration victims. While it doesn't fully resolve the double registration problem, this will be life changing for those given an ID through this process.

We also have a series of results from our mobilisation work where others have joined us in their advocacy. As examples, in 2021 we worked with partners to conduct joint advocacy, e.g. on ID in Colombia, Kenya, Lebanon, Mexico, Panama, Philippines, South Africa and Uganda; to create education tools, e.g. on protest surveillance in Colombia, Argentina, Palestine, and Paraguay; and to run joint campaigns, e.g. nine CSOs from Kenya, Nigeria and Uganda joined our campaign against Tecno on our advocacy against the Chinese mobile phone giant's sale of low-cost insecure mobile phones.

We Expose Harms and Abuses

When we are able to reveal to people and stakeholders what happens behind the curtain of industry or government policy or inside the black box of technology, the case for change becomes clear. This type of work takes a lot of patience, technical and legal know-how, and sometimes risk. We record as 'impact' when our work spurs changes by our targeted adversaries.

Exposure Impacts

- *Companies improve protections.* Two of three online diet companies that we investigated subsequently changed their privacy controls. Both vshred.com and BetterMe.world implemented a cookie banner as a result of PI's research and engagement; BetterMe.com stopped sharing test answers with third parties by explicitly giving users an option to decline tracking and targeted advertising via cookies.
- *Tech giant extends protections.* In January 2022 Google announced that it was now extending Privacy Sandbox to Android apps, and working on solutions that will limit sharing users' data and "operate without cross app identifiers, including advertising ID". In our long-term engagement with Google, we repeatedly raised our concerns and asked for tracking minimisation (based on Google Privacy Sandbox); we can affirm some contribution to the announced change.

We also have a series of results from our work to ensure that key institutions and stakeholders are situated to act upon our work. An interesting result also arises when we force our targets to disclose even more. In 2021 we continued to research digital welfare systems including with our partners in India, Pakistan and Colombia who were able to engage with relevant government bodies and with CSOs working on social justice issues, and with groups in vulnerable socio-economic situations including women and migrant communities. Our work on data in reproductive health was used by public health groups in Norway, Latin America, and the UNDP. Our research to expose surveillance techniques forced governments to further disclose their practices, e.g. the UK Government responded to our requests and revealed the use of mobile phone extraction against people arriving in small boats, and the government of Valenciennes in France disclosed their contract with Huawei for city-level surveillance. In one of our legal cases, our research resulted in the cross-examination of a member of staff from the UK intelligence and security community.

We Demand Changes and Higher Standards

Getting ourselves into a position to be heard is one challenge; a greater challenge is coming to the table with meaningful demands and solutions. This type of work requires conducting extensive research, developing expertise, exploring options, stress-testing our solutions. *Impact* is when our demands become the new standard.

Demands & Standards Impact

- *Strengthened data security for users of lower-cost tech.* In response to our engagement and pressure, Google confirmed that the JioPhone Next, a new low-cost phone launched with Reliance in India, will receive the latest Android and security updates. Moreover, Google recommended use of the Android Profile in the Internet of Things Alliance (ioXt) security standards, developed with contributions from PI.

- *Better protections within global standards for vaccination certificates.* WHO guidance on Covid vaccination certificates integrates some of PI's demands to recognise the risks not just in relation to privacy but also exclusion/discrimination, and to demand of governments to comply with their legal obligations in relations to privacy, data protection, and broadly human rights and freedoms.
- *Bulk interception safeguards in South Africa's constitutional court ruling.* PI's legal interventions contributed towards a historic decision from the Constitutional Court of South Africa, which ruled that bulk interception by the South African National Communications Centre is unlawful and invalid. This decision held that secret and unchecked surveillance practices used by South African authorities must be explicitly stated in law so they can be considered and debated.
- *Secret data capture found unlawful, in UK tribunal decision.* The UK's Investigatory Powers Tribunal judgment declared that section 94 of the Regulation on Investigatory Powers 2000 was incompatible with EU law. The result is that decade's worth of secret data capture by UK government agencies has been held to be unlawful.
- *New legal standard set for European surveillance, by European Court of Human Rights.* The Grand Chamber of the European Court of Human Rights ruled that the UK's mass surveillance regime, first exposed by Edward Snowden in 2013, breached people's rights to privacy and freedom of expression. PI supported and led many aspects of this case over the eight-year journey. We expect Council of Europe countries to review their surveillance laws and practices in light of this judgment and bring them to line with the Court's jurisprudence.
- *New law to regulate police access to mobile phones, in UK.* PI contributed to the development of the new UK Police, Crime, Sentencing and Courts Bill (Policing Bill). The Bill represent UK Government's response to the UK privacy regulator's report on mobile phone data extraction by police forces. The regulator's report was produced as a response to PI's complaint. Through our advocacy we contributed to a series of amendments.

We have a series of results where organisations and institutions relay and adopt our positions. In 2021 our work on elections resulted in adoption and use of our guidance by the election observation community, the UN Special Rapporteur on Freedom of Expression, and the Council of Europe. Our advocacy has also forced reviews of surveillance policies, including the UK government's proposed Law Enforcement Data Service's integration of entire policing databases, and a parliamentary review of the use of mobile phone extraction. The European Ombudsman opened an inquiry into the European Commission's transfers of surveillance capabilities based on our complaint. Our guidance on regulatory regimes is also being heeded, including our input on the EU's Digital Markets Act being included in the European Parliament's proposed law, and the UK Competition Authority's investigation into the Facebook-Giphy merger. And influential bodies have taken stronger positions following from our work, including a UN Human Rights Council's resolution adopting a stronger language on encryption and hacking, the UK House of Lords Justice and Home Affairs Committee expanding its inquiry into new technologies to include Border management, and our intervention in a case at the French High Court and the Court of Justice of the European Union on data retention resulting in new obligations on the French Government. Others sought our advice and included our work in theirs, including France's constitutional body

Défenseur des droits that incorporated our concerns in its report on facial recognition, as did UNDP in its work on rights-based and ethical use of digital technologies in HIV and health programmes, and the WHO's report on ethics and AI.

We Campaign with the Public for Solutions

Engaging people, beneficiaries, and publics with care means that we must reach, inform, inspire, and provide them meaningful channels for their voices to be heard. We pick our campaigns with care. We seek to provide people with the tools they need. We seek impact in the form of informing, focusing and channelling the public's concerns towards powerful institutions to demand change.

Public Campaigning Impact

- *Public support and unions act against gig-economy work, bringing Uber to the table.* PI together with Worker Info Exchange (WIE) and the App Drivers and Couriers Union (ADCU)

launched "Managed by Bots" campaign challenging the surveillance techniques deployed by some of the biggest companies in the gig economy sector. Our petition asking members of the public and gig workers in particular to sign up to our letter gathered over 1 800 signatures. A significant proportion of these signatures came from gig-economy workers. At the moment of writing, PI and our partners WIE and ADCU have been invited to meet with Uber to discuss existing issues and potential solutions.

We also have a series of results around public traction amidst our work on demystifying the complexity of these issues. This work includes instances when public-facing organisations join our campaigns to raise awareness of complex issues, e.g. 40 organisations joined our campaign calling on the European Commission to regulate biometric technologies;, or when it is recognised how these issues affect specific communities, e.g. 22 migration and asylum organisations joined our campaign on the UK Government's surveillance of asylum seekers. We also have a considerable global media presence, with journalists from 29 countries contacting us with 319 media enquiries. Our media coverage in 2021 grew to 728 media hits, which represents 44% increase from the previous year.

Lessons, monitoring & evaluation

Over the reporting period PI continued to regularly reflect and learn to improve our interventions. Internally, key lessons and adaptations in 2021 were related to enhancing project management, developing a new strategy for our international network, testing and building internal infrastructure for our coordination areas and processes. Externally, we tried new approaches of engagement with companies and learning from challenging political contexts as risks increase globally.

All elements of our learning have been integrated in 2022 project planning and will be further monitored and evaluated, particularly as we develop our next strategic plan.

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 increased slightly to £1.9m (2020/2021: £1.86m) mostly as a result of changes to staff costs and a very slow return to more regular level of activities, as the organisation and its allies kept recovering and re-adjusting the intensity of work in the ongoing global health emergency.

The incoming resources for the year were £2.28m (2020/2021: £2.95m, restated) – steady level of income in 2021/2022 reflects ongoing multi-year grant agreements in support of the current organisational strategy (2018–2022), with a decrease in project specific and emergency funding, which saw numbers in 2020/2021 increase.

The total funds of the charity at the end of the year were £2.9m. This included £643k in project and other restricted funds and £2.2m in general funds. The trustees have set aside £1.57m of designated funds for delivery of current strategic objectives, projects and activities. The Trustees expect the fund to be fully utilised by January 2024. There is also £56k of designated fixed assets funds. The remaining £623k of general funds is held for operational working capital requirements to address financial risks surrounding income and expenditure in line with the reserves policy set out below.

Principal risks and uncertainties

The second year of the pandemic created a new inertia. PI staff haven't travelled to see our partners across the world – a core part of PI's and our staff's identity and integral part of PI's work. Due to mostly still operating remotely, it also took months for new colleagues to onboard and integrate fully into work. Dislodging this inertia and moving to a post-pandemic posture was and will continue to be very challenging. In July 2021 we established what that future working pattern would entail and began experimenting with those new working practices – until covid numbers fluctuated and variants emerged disrupting patterns all over again and created further uncertainties and delays to PI's and PI's allies' work.

There were also challenges in navigating pandemic divisions. Had we chosen to get involved in deeply divided debates about covid passports and vaccine mandates, we could have certainly fomented outrage and gained followings. Rather we stuck to focusing on where we could say something unique and meaningful, such as engaging with WHO's standard-making process as we knew it would outlast the pandemic and hopefully constrain some of the more ambitious governments' grand plans.

Maintaining staff morale through this period has also been challenging. Introducing new Human Resources procedures and deciding future work practices in this environment was hard but

necessary. We provide substantial resources to PI staff and prioritise wellbeing and hope we are making the right decisions for an equitable future for PI staff, today and tomorrow.

Changes in funding environment and shift due to ongoing global crisis and economic uncertainties have potentially positive and negative consequences for PI: while the funding space is shrinking, PI's relevance and expertise continues to be very valued by existing institutional funders. PI recognises the ongoing global crises could cause funders to divert funding to other causes, and we are monitoring these shifts very closely

Reserves policy and going concern

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 unrestricted and undesignated reserves equivalent to 6 months' running costs – resulting in a target of £750k (currently: £623k, constituting 5 months of operational costs, representing the amount of general reserves not designated or otherwise committed to activity expenditure in FY 2022/2023).

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.

After making appropriate enquiries and reviewing the potential ongoing impact of COVID-19, the Trustees have a reasonable expectation that the company has adequate resources to continue in operational existence for the foreseeable future. For this reason, they continue to adopt the going concern basis in preparing the financial statements.

Fundraising

Pi is working hard to ensure that PI's work is independent, cutting-edge and can be sustained for years to come. As a result, PI's work is funded by a variety of different sources. We do not accept funding from corporations because we believe that it would jeopardise the independence of our activities. We do not work with specialist fundraising service providers and fundraising is conducted by PI staff.

Main sources of funding for PI are multi-year grants (core support and project support alike) from a small number of big institutional donors. Public donations remain below 1% of overall annual income, which Privacy International aims to change with the goal of diversifying the funding to move away from high dependency on limited number of donors through building new public fundraising initiatives.

While public fundraising is a new avenue for PI, we strive for the highest standards in fundraising. We do not participate in fundraising and marketing tactics that we see as privacy intrusive. Furthermore, we go beyond what GDPR legislation lays out, and have developed our supporter platform set up so supporters have control over their data, including being able to stop

Privacy International

Trustees' annual report

For the year ended 31 January 2022

communications and withdraw consent whenever they want. In 2021/2022 we did not receive any complaints.

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

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

Volunteers and pro bono support

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, Brick Court Chambers, Garden Court Chambers, Bhatt Murphy, Liberty, Hausfeld & Co LLP, Linklaters, Covington & Burling LLP, independent counsel, and various university departments, law clinics and legal experts at the Harvard Law School International Human Rights Clinic, University of Buffalo Law School Clinic, Yale Law School – Media Freedom and Information Access Clinic (MFIA), the University of Edinburgh – Edinburgh International Justice Initiative and Humboldt University, Berlin – Internet Law Clinic.

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.

Plans for the future

2022 is the last year of PI's current strategic plan. We expect to undertake evaluations and reflections, exploring our unique contributions to the sector and in the world. We will also seek to identify future challenges for PI to face and overcome as PI expects to develop its next strategic plan in 2022 to cover 2023–2026.

What we foresee as largest challenges

The largest challenges in 2022 are mostly related to external, unpredictable events and developments that might negatively impact our work including political or military conflicts in the countries we work in. PI has accumulated extensive learning in relation to risk assessment and mitigation. We will use these experiences as we engage increasingly in countries and regions with high levels of risk, e.g. we will continue to explore engagement in Eurasia in 2022, and identify alternative plans if risks mount.

A positive challenge for PI is the development of a new strategic plan (2023–2026) which should reflect our uniqueness, and a clearly articulated vision and priorities for the near future. This is a

challenging process considering there are so many pressing problems in the world for us to address, while there is also growing competence in the sector, and even faster growing set of technological developments across sectors that we may engage.

What are we doing about them

PI plans extensively to minimise the risks and develop solutions. In our experience, effective planning and project management makes it possible to achieve real change. We identify desired impact, results, ways of achieving them, associated risks and mitigation strategies. Our regular reflections and quarterly evaluations help us to timely understand if everything is going according to the plan or requires adopting planned alternatives. We also regularly train staff on project management, conflict management, and methods for working cooperatively. We also regularly seek to improve our technical and legal skills.

To ensure that our new strategic plan will reflect PI's role and is relevant to the current development in the world we will carefully assess our current achievements (through internal and external evaluations), build staff's understanding on the process of strategic planning, will constantly be reflecting about our values, tactics, operations, competitors, allies, targets, risks, business-models. We will be engaging with key stakeholders and further exploring global trends, seek our problem-areas, and map directions of technological developments and their impacts on people.

Structure, governance and management

The organisation is a charitable company limited by guarantee, incorporated on 16 January 2002 and registered as a charity on 26 May 2012.

The company was established under a memorandum of association which established the objects and powers of the charitable company and is governed under its articles of association.

All trustees give their time voluntarily and receive no benefits from the charity. Any expenses reclaimed from the charity are set out in note 6 to the accounts.

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. The Board of Trustees delegates day-to-day management of the charity to the Executive Director.

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.

Privacy International

Trustees' annual report

For the year ended 31 January 2022

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.

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.

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 revised in late 2021 and applies to all employees, volunteers and contractors, both in the UK and overseas.

Appointment of trustees

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.

Trustee induction and training

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.

Remuneration policy for key management personnel

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.

Statement of responsibilities of the trustees

The trustees (who are also directors of Privacy International for the purposes 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 the 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:

- Select suitable accounting policies and then apply them consistently
- Observe the methods and principles in the Charities SORP
- Make judgements and estimates that are reasonable and prudent
- State whether applicable UK Accounting Standards and statements of recommended practice have been followed, subject to any material departures disclosed and explained in the financial statements
- Prepare the financial statements on the going concern basis unless it is inappropriate to presume that the charity will continue in operation

Privacy International

Trustees' annual report

For the year ended 31 January 2022

The trustees are responsible for keeping adequate accounting records that 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. 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.

In so far as the trustees are aware:

- There is no relevant audit information of which the charitable company's auditor is unaware
- 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

The trustees are responsible for the maintenance and integrity of the corporate and financial information included on the charitable company's website. Legislation in the United Kingdom governing the preparation and dissemination of financial statements may differ from legislation in other jurisdictions.

Members of the charity guarantee to contribute an amount not exceeding £1 to the assets of the charity in the event of winding up. The total number of such guarantees at 31 January 2022 was 11 (2020/2021: 9). The trustees are members of the charity but this entitles them only to voting rights. The trustees have no beneficial interest in the charity.

Auditor

Sayer Vincent LLP was re-appointed as the charitable company's auditor during the year and has expressed its willingness to continue in that capacity.

The trustees' annual report has been approved by the trustees on 12 September 2022 and signed on their behalf by

Joshua Castellino

Chair of the Board

Independent auditor's report to the members of

Privacy International

For the year ended 31 January 2022

Opinion

We have audited the financial statements of Privacy International (the 'charitable company') for the year ended 31 January 2022 which comprise the statement of financial activities, balance sheet, statement of cash flows and notes to the financial statements, including significant accounting policies. The financial reporting framework that has been applied in their preparation is applicable law and United Kingdom Accounting Standards, including FRS 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 2022 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
- 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 Auditor's 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 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 Privacy International'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.

Independent auditor's report to the members of

Privacy International

For the year ended 31 January 2022

Other Information

The other information comprises the information included in the trustees' annual report, other than the financial statements and our auditor's report thereon. The trustees are responsible for the other information contained within the annual report. 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. 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 course of 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 this gives rise to a material misstatement in the financial statements themselves. 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.

Opinions on other matters 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' annual report, for the financial year for which the financial statements are prepared is consistent with the financial statements; and
- The trustees' annual report, has been prepared in accordance with applicable legal requirements.

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 trustees' annual report. We have nothing to report in respect of the following matters in relation to which the Companies Act 2006 requires us to report to you if, in our opinion:

- Adequate 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 directors were not entitled to prepare the financial statements in accordance with the small companies regime and take advantage of the small companies' exemptions

Independent auditor's report to the members of

Privacy International

For the year ended 31 January 2022

in preparing the trustees' annual report and from the requirement to prepare a strategic report.

Responsibilities of trustees

As explained more fully in the statement of trustees' responsibilities set out in the trustees' annual report, 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 is 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 are set out below.

Capability of the audit in detecting irregularities

In identifying and assessing risks of material misstatement in respect of irregularities, including fraud and non-compliance with laws and regulations, our procedures included the following:

Independent auditor's report to the members of

Privacy International

For the year ended 31 January 2022

- We enquired of management and Finance and Audit committee, which included obtaining and reviewing supporting documentation, concerning the charity's policies and procedures relating to:
 - Identifying, evaluating, and complying with laws and regulations and whether they were aware of any instances of non-compliance;
 - Detecting and responding to the risks of fraud and whether they have knowledge of any actual, suspected, or alleged fraud;
 - The internal controls established to mitigate risks related to fraud or non-compliance with laws and regulations.
- We inspected the minutes of meetings of those charged with governance.
- We obtained an understanding of the legal and regulatory framework that the charity operates in, focusing on those laws and regulations that had a material effect on the financial statements or that had a fundamental effect on the operations of the charity from our professional and sector experience.
- We communicated applicable laws and regulations throughout the audit team and remained alert to any indications of non-compliance throughout the audit.
- We reviewed any reports made to regulators.
- We reviewed the financial statement disclosures and tested these to supporting documentation to assess compliance with applicable laws and regulations.
- We performed analytical procedures to identify any unusual or unexpected relationships that may indicate risks of material misstatement due to fraud.
- In addressing the risk of fraud through management override of controls, we tested the appropriateness of journal entries and other adjustments, assessed whether the judgements made in making accounting estimates are indicative of a potential bias and tested significant transactions that are unusual or those outside the normal course of business.

Because of the inherent limitations of an audit, there is a risk that we will not detect all irregularities, including those leading to a material misstatement in the financial statements or non-compliance with regulation. This risk increases the more that compliance with a law or regulation is removed from the events and transactions reflected in the financial statements, as we will be less likely to become aware of instances of non-compliance. The risk is also greater regarding irregularities occurring due to fraud rather than error, as fraud involves intentional concealment, forgery, collusion, omission or misrepresentation.

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

Independent auditor's report to the members of

Privacy International

For the year ended 31 January 2022

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 auditor's 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.

Noelia Serrano (Senior statutory auditor)

15 September 2022

for and on behalf of Sayer Vincent LLP, Statutory Auditor
Invicta House, 108-114 Golden Lane, LONDON, EC1Y 0TL

Privacy International

Statement of financial activities (incorporating an income and expenditure account)

For the year ended 31 January 2022

				2022			2021
	Note	Unrestricted £	Restricted £	Total £	Restated Unrestricted £	Restated Restricted £	Restated Total £
Income from:							
Donations and legacies		18,088	–	18,088	17,351	–	17,351
Charitable activities	2	1,437,843	808,924	2,246,767	2,075,002	853,580	2,928,582
Other income		12,709	–	12,709	3,199	–	3,199
Investments		152	–	152	1,126	–	1,126
Total income		1,468,791	808,924	2,277,715	2,096,678	853,580	2,950,258
Expenditure on:							
Charitable activities	3	1,377,034	526,744	1,903,778	986,978	870,395	1,857,373
Total expenditure		1,377,034	526,744	1,903,778	986,978	870,395	1,857,373
Net income / (expenditure) for the year	5	91,757	282,180	373,937	1,109,700	(16,815)	1,092,885
Transfers between funds	14	11,212	(11,212)	–	12,840	(12,840)	–
Net movement in funds		102,969	270,968	373,937	1,122,540	(29,655)	1,092,885
Reconciliation of funds:							
Total funds brought forward		2,155,341	372,065	2,527,406	1,032,801	401,720	1,434,521
Total funds carried forward		2,258,310	643,033	2,901,343	2,155,341	372,065	2,527,406

All of the above results are derived from continuing activities. There were no other recognised gains or losses other than those stated above. Movements in funds are disclosed in Note 14a to the financial statements. □

Detailed information on restatement of income for prior year is included in Note 17 to the financial statements

Privacy International

Balance sheet

Company no. 4354366

As at 31 January 2022

	Note	£	2022 £	Restated £	2021 Restated £
Fixed assets:					
Tangible assets	10		<u>55,868</u>		<u>78,358</u>
			55,868		78,358
Current assets:					
Debtors	11	60,740		62,236	
Cash at bank and in hand		<u>2,881,825</u>		<u>2,456,705</u>	
		2,942,565		2,518,941	
Liabilities:					
Creditors: amounts falling due within one year	12	<u>(97,090)</u>		<u>(69,893)</u>	
Net current assets			<u>2,845,475</u>		<u>2,449,048</u>
Total net assets			<u><u>2,901,343</u></u>		<u><u>2,527,406</u></u>
The funds of the charity:					
Restricted income funds	14a		643,033		372,065
Unrestricted income funds:					
Designated funds		<u>1,635,444</u>		<u>78,358</u>	
General funds		<u>622,866</u>		<u>2,076,983</u>	
Unrestricted general funds			<u>2,258,310</u>		<u>2,155,341</u>
Total charity funds			<u><u>2,901,343</u></u>		<u><u>2,527,406</u></u>

Approved by the trustees on 12 September 2022 and signed on their behalf by

Professor Joshua Castellino
Trustee

Privacy International

Statement of cash flows

For the year ended 31 January 2022

	2022		2021	
	£	£	Restated £	Restated £
Cash flows from operating activities				
Net income for the reporting period (as per the statement of financial activities)	373,937		1,092,885	
Depreciation charges	33,651		35,871	
Dividends, interest and rent from investments	(152)		(1,126)	
Decrease / (increase) in debtors	1,498		(26,174)	
Increase/(decrease) in creditors	27,195		(27,253)	
Net cash provided by operating activities		436,130		1,074,203
Cash flows from investing activities:				
Dividends, interest and rents from investments	152		1,126	
Purchase of fixed assets	(11,161)		(22,424)	
Net cash (used in) investing activities		(11,009)		(21,298)
Change in cash and cash equivalents in the year		425,120		1,052,905
Cash and cash equivalents at the beginning of the year		2,456,705		1,403,800
Cash and cash equivalents at the end of the year		2,881,825		2,456,705

Analysis of cash and cash equivalents and of net debt

	At 1 February 2021 £	Cash flows £	Other non- cash changes £	At 31 January 2022 £
Cash at bank and in hand	2,456,705	425,120	-	2,881,825
Total cash and cash equivalents	2,456,705	425,120	-	2,881,825

1 Accounting policies

a) Statutory information

Privacy International is a charitable company limited by guarantee and is incorporated in England & Wales.

The registered office address and principal place of business is 62 Britton Street, London, EC1M 5UY.

b) Basis of preparation

The financial statements have been prepared in accordance with 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) – (Charities SORP FRS 102), The Financial Reporting Standard applicable in the UK and Republic of Ireland (FRS 102) and the Companies Act 2006/Charities Act 2011.

Assets and liabilities are initially recognised at historical cost or transaction value unless otherwise stated in the relevant accounting policy or note.

In applying the financial reporting framework, the trustees have made a number of subjective judgements, for example in respect of significant accounting estimates. Estimates and judgements are continually evaluated and are based on historical experience and other factors, including expectations of future events that are believed to be reasonable under the circumstances. The nature of the estimation means the actual outcomes could differ from those estimates. Any significant estimates and judgements affecting these financial statements are detailed within the relevant accounting policy below.

c) Public benefit entity

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

d) 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.

e) Income

Income is recognised when the charity has entitlement to the funds, any performance conditions attached to the income have been met, it is probable that the income will be received and that the amount can be measured reliably.

Income from government and other grants, whether 'capital' grants or 'revenue' grants, is recognised when the charity has entitlement to the funds, any performance conditions attached to the grants have been met, it is probable that the income will be received and the amount can be measured reliably and is not deferred.

f) Donations of gifts, services and facilities

Donated professional services and donated facilities are recognised as income when the charity has control over the item or received the service, any conditions associated with the donation have been met, the receipt of economic benefit from the use by the charity of the item is probable and that economic benefit can be measured reliably. In accordance with the Charities SORP (FRS 102), volunteer time is not recognised so refer to the trustees' annual report for more information about their contribution.

On receipt, donated gifts, professional services and donated facilities are recognised on the basis of the value of the gift to the charity which is the amount the charity would have been willing to pay to obtain services or facilities of equivalent economic benefit on the open market; a corresponding amount is then recognised in expenditure in the period of receipt.

1 Accounting policies (continued)

g) Interest receivable

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.

h) Fund accounting

Restricted funds are to be used for specific purposes as laid down by the donor. Expenditure which meets these criteria is charged to the fund.

Unrestricted funds are donations and other incoming resources received or generated for the charitable
Designated funds are unrestricted funds earmarked by the trustees for particular purposes.

i) Expenditure recognition

Expenditure is recognised once there is a legal or constructive obligation to make a payment to a third party, it is probable that settlement will be required and the amount of the obligation can be measured reliably. Irrecoverable VAT is charged as a cost against the activity for which the expenditure was incurred. Expenditure is classified under the following activity headings:

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. Irrecoverable VAT is charged as a cost against the activity for which the expenditure was incurred.

Allocation of support costs

Support costs are allocated to the charity's charitable activities.

Governance costs are the costs associated with the governance arrangements of the charity. These costs are associated with constitutional and statutory requirements and include any costs associated with the strategic management of the charity's activities.

1 Accounting policies (continued)

j) 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
● Leasehold improvements	20% on cost

k) Debtors

Trade and other debtors are recognised at the settlement amount due after any trade discount offered. Prepayments are valued at the amount prepaid net of any trade discounts due.

l) Cash at bank and in hand

Cash at bank and cash in hand includes cash and short term highly liquid investments with a short maturity of three months or less from the date of acquisition or opening of the deposit or similar account.

m) Creditors and provisions

Creditors and provisions are recognised where the charity has a present obligation resulting from a past event that will probably result in the transfer of funds to a third party and the amount due to settle the obligation can be measured or estimated reliably. Creditors and provisions are normally recognised at their settlement amount after allowing for any trade discounts due.

n) Financial instruments

The charity only has financial assets and financial liabilities of a kind that qualify as basic financial instruments. Basic financial instruments are initially recognised at transaction value and subsequently measured at their settlement value.

o) 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.

2 Income from charitable activities

			2022		2021	
	Unrestricted	Restricted	Total	Restated Unrestricted	Restated Restricted	Restated Total
	£	£	£	£	£	£
Grants		-	-		-	-
Open Society	540,541		540,541	823,698		823,698
Oak Foundation	261,038		261,038	263,550		263,550
Luminate	503,446		503,446	642,978		642,978
Ford Foundation	109,318		109,318	344,776		344,776
Donated in-kind	23,500		23,500			-
Ford Foundation	-	153,328	153,328	-	261,753	261,753
Ford Foundation BUILD	-	72,879	72,879	-	-	-
Open Society	-	37,347	37,347	-	101,419	101,419
IDRC	-	-	-	-	59,151	59,151
SIDA	-	487,370	487,370	-	431,258	431,258
Paul Hamlyn Foundation	-	58,000	58,000	-	-	-
	1,437,843	808,924	2,246,767	2,075,002	853,581	2,928,583

Privacy International

Notes to the financial statements

For the year ended 31 January 2022

3a Analysis of expenditure (current year)

	Charitable Activities £	Governance costs £	Support costs £	2022 Total £	2021 Total £
Staff costs (Note 6)	1,267,775	-	-	1,267,775	1,140,978
Other staff related costs	30,536	-	-	30,536	14,110
Grants to partners (note 4)	232,269	-	-	232,269	345,598
Project expenses	27,107	-	-	27,107	37,405
Rent	-	-	85,416	85,416	85,346
Depreciation	-	-	33,651	33,651	35,871
Consultancy	51,782	-	-	51,782	50,501
Trustee expenses	-	-	-	-	8,181
Audit	-	22,320	-	22,320	13,380
(Gains)/losses on foreign exchang	61	-	-	61	-
Office expenses	-	-	104,401	104,401	97,240
Legal and professional fees	9,455	-	23,500	32,955	11,924
Travel and accommodation	528	-	-	528	6,094
Translation	12,312	-	-	12,312	7,488
Other costs	335	13	2,317	2,665	3,257
	<u>1,632,160</u>	<u>22,333</u>	<u>249,285</u>	<u>1,903,778</u>	<u>1,857,373</u>
Support costs	249,285	-	(249,285)	-	-
Governance costs	22,333	(22,333)	-	-	-
Total expenditure 2022	<u>1,903,778</u>	<u>-</u>	<u>-</u>	<u>1,903,778</u>	
Total expenditure 2021	<u>1,857,373</u>	<u>-</u>	<u>-</u>		<u>1,857,373</u>

3b Analysis of expenditure (prior year)

	Charitable activities £	Governance costs £	Support costs £	2021 Total £
Staff costs (Note 6)	1,140,978	-	-	1,140,978
Other staff related costs	14,110	-	-	14,110
Grants to partners (note 4)	345,598	-	-	345,598
Project expenses	37,405	-	-	37,405
Rent	-	-	85,346	85,346
Depreciation	-	-	35,871	35,871
Consultancy	50,501	-	-	50,501
Trustee expenses	-	8,181	-	8,181
Audit	-	13,380	-	13,380
(Gains)/losses on foreign exchange	-	-	-	-
Office expenses	-	-	97,240	97,240
Legal and professional fees	-	-	11,924	11,924
Travel and accommodation	6,094	-	-	6,094
Translation	7,488	-	-	7,488
Other costs	272	13	2,972	3,257
	<u>1,602,446</u>	<u>21,574</u>	<u>233,353</u>	<u>1,857,373</u>
Support costs	233,353	-	(233,353)	-
Governance costs	21,574	(21,574)	-	-
Total expenditure 2021	<u>1,857,373</u>	<u>-</u>	<u>-</u>	<u>1,857,373</u>

The presentation of analysis of expenditure (prior year) is amended to display grants to other parties as a separate expenditure item (details in note 4)

Following prior year adjustment of income (see note 17 for more details), note 3b reflects restated expenditure, where foreign exchange as related to accrued income was not applicable with changed income recognition criteria

4 Grant making to institutions

	2022 £	2021 £
Cost		
Asociación por los Derechos Civiles	12,900	19,660
Asociația pentru Tehnologie și	–	9,757
The Centre for Intellectual Property and Information Technology Law (CIPIT)	–	11,922
The Centre for Internet and Society	18,572	9,000
Coding Rights	–	14,625
Fundacion Datos Protegidos	14,980	9,017
Corporación Centro De Estudios de Derecho, Justicia y Sociedad –Dejusticia	7,000	11,246
Derechos Digitales	–	7,145
The Institute for Policy Research and Advocacy (ELSAM)	–	45,738
Foundaiton for Media Alternatives	11,992	24,149
Hermes Center for Transparency and Digital Human	8,111	–
Hiperderecho	–	9,076
Impetus	9,050	–
Internet Labs	–	11,000
lpandetec	1,208	6,800
Fundacion Karisma	17,772	26,002
Kenya Legal and Ethical issues network on HIV&AIDS	15,000	14,000
Defenders Coalition – Kenya	5,274	25,772
Social Media Exchange	11,784	24,721
The Libertarian Research & Education Trust	19,776	9,142
TEDIC	12,500	–
Unwanted Witness	19,465	27,117
Other	46,885	29,709
At the end of the year	<u>232,269</u>	<u>345,598</u>

Other grants include grants to partners below £5,000 in the year and also those organisations which need to remain anonymous due to sensitive nature of their work.

5 Net income / (expenditure) for the year

This is stated after charging / (crediting):

	2022 £	2021 £
Depreciation	33,651	35,871
Auditor's remuneration (gross of VAT):		
Audit	12,000	3,600
Other services	10,320	9,780
	<u>55,971</u>	<u>49,251</u>

6 Analysis of staff costs, trustee remuneration and expenses, and the cost of key management personnel

Staff costs were as follows:

	2022 £	2021 £
Salaries and wages	1,074,560	973,997
Social security costs	118,357	103,076
Employer's contribution to defined contribution pension schemes	74,859	63,905
	<u>1,267,776</u>	<u>1,140,978</u>

The following number of employees received employee benefits (excluding employer pension costs and employer's national insurance) during the year between:

	2022 No.	2021 No.
£60,000 – £69,999	–	–
£70,000 – £79,999	–	–
£80,000 – £89,999	1	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 £89,495 (2021: £87,740).

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.

During the year the charity didn't pay any expenses to trustees. (2021: £381).

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.

7 Staff numbers

The average number of employees (head count based on number of staff employed) during the year was 26

8 Related party transactions

There are no related party transactions to disclose for this financial year (2021: none).

9 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.

10 Tangible fixed assets

	Leasehold improvements £	Software £	Computer equipment £	Furniture & fixtures £	Total £
Cost					
At the start of the year	107,315	3,645	54,751	21,273	186,984
Additions in year	-	-	11,161	-	11,161
At the end of the year	107,315	3,645	65,912.00	21,273	198,145
Depreciation					
At the start of the year	44,676	3,645	44,170	16,135	108,626
Charge for the year	21,463	-	10,056	2,132	33,651
At the end of the year	66,139	3,645	54,226	18,267	142,277
Net book value					
At the end of the year	41,176	-	11,686	3,006	55,868
At the start of the year	62,639	-	10,581	5,138	78,358

All of the above assets are used for charitable purposes.

11 Debtors

	2022 £	2021 Restated £
Rent deposit	15,478	15,478
Prepayments	45,262	45,801
Accrued income	-	957
	60,740	62,236

12 Creditors: amounts falling due within one year

	2022 £	2021 £
Trade creditors	10,433	4,339
Credit cards	2,573	(3,772)
Payroll taxes	31,046	27,109
Accruals	53,038	42,217
	97,090	69,893

13a Analysis of net assets between funds (current year)

	General unrestricted £	Designated £	Restricted £	Total funds £
Tangible fixed assets	–	55,868	–	55,868
Current assets	622,866	1,676,666	643,033	2,942,565
Current liabilities	–	(97,090)	–	(97,090)
Net assets at 31 January 2022	622,866	1,635,444	643,033	2,901,343

13b Analysis of net assets between funds (prior year)

	General unrestricted Restated £	Designated Restated £	Restricted Restated £	Total funds Restated £
Tangible fixed assets	–	78,358	–	78,358
Current assets	2,146,876	–	372,065	2,518,941
Current liabilities	(69,893)	–	–	(69,893)
Net assets at 31 January 2021	2,076,983	78,358	372,065	2,527,406

14a Movements in funds (current year)

	At 1 February 2021 £	Income & gains £	Expenditure & losses £	Transfers £	At 31 January 2022 £
Restricted funds:					
Ford Foundation	236,067	153,328	(208,645)	-	180,750
Ford Foundation BUILD	-	72,879	(22,729)		50,150
Foundation to Promote Open Society	9,574	-	1,638	(11,212)	-
Foundation to Promote Open Society – Eurasia	-	37,347	(4,002)		33,345
Luminate	45,417	-	(12,939)	-	32,478
Paul Hamlyn Foundation	-	58,000	(56,970)	-	1,030
The Swedish International Development Cooperation Agency – Core support	-	487,370	(171,618)	-	315,752
The Swedish International Development Cooperation Agency – Project	81,007	-	(51,479)	-	29,528
Total restricted funds	372,065	808,924	(526,744)	(11,212)	643,033
Unrestricted funds:					
Designated funds:					
2024 Activity fund	-			1,579,576	1,579,576
Fixed asset fund	78,358	-	-	(22,490)	55,868
Total designated funds	78,358	-	-	1,557,086	1,635,444
General funds	2,076,983	1,468,791	(1,377,034)	(1,545,874)	622,866
Total unrestricted funds	2,155,341	1,468,791	(1,377,034)	11,212	2,258,310
Total funds	2,527,406	2,277,715	(1,903,778)	-	2,901,343

The narrative to explain the purpose of each fund is given at the foot of the note below.

14b Movements in funds (prior year)

	At 1 February 2020 Restated £	Income & gains Restated £	Expenditure & losses Restated £	Transfers Restated £	At 31 January 2021 Restated £
Restricted funds:					
Adessium Foundation	13,086	–	–	(13,086)	–
Ford Foundation	–	261,753	(25,686)	–	236,067
Foundation to Promote Open Society	103,686	101,419	(195,531)	–	9,574
IDRC	33,172	59,151	(92,323)	–	–
Luminate	49,597	–	(4,180)	–	45,417
Paul Hamlyn Foundation	55,150	–	(55,396)	246	–
The Swedish International Development Cooperation Agency	147,028	431,258	(497,279)	–	81,007
Total restricted funds	401,720	853,580	(870,395)	(12,840)	372,065
Unrestricted funds:					
Designated funds:					
Fixed asset fund	91,805	–	–	(13,447)	78,358
Total designated funds	91,805	–	–	(13,447)	78,358
General funds	940,996	2,096,678	(986,978)	26,287	2,076,983
Total unrestricted funds	1,032,801	2,096,678	(986,978)	12,840	2,155,341
Total funds	1,434,521	2,950,258	(1,857,373)	–	2,527,406

Purposes of restricted funds

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.

Ford Foundation

The Ford Foundation is a globally oriented private foundation with the mission of advancing human welfare. In late 2020 Privacy International received a 2 year-grant to support civil society in the Global South to advocate and litigate against unfair surveillance responses to COVID-19. In October 2020 PI received a five-year general support grant, combined with targeted organizational strengthening through Ford Foundation BUILD program.

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 November 2018, until January 2021, Privacy International received grant to work with other civil society actors to challenge the drivers of digital identity systems and advocate for protection of rights and in September 2021 PI received a grant to explore our engagement in new geographical areas.

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 mid-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 February 2021 PI received a 3-year grant to look into invasive data exploitation practices in immigration processes

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 January 2017 and completed in April 2021, aimed to strengthen civil society's capacity to protect the right to privacy, while confronting data-driven transformations in power. In June 2021 PI received from SIDA grant to support PI's strategy through to January 2025.

Purposes of designated funds

Activity fund

The 2024 activity fund represents funds set aside by the trustees in the 2021/22 financial year for delivery of current strategic objectives, projects and activities. The Trustees expect the fund to be fully utilised by January 2024.

Fixed Asset fund

The fixed asset fund represents the net book value of fixed assets at year-end as these are not freely available for the charity's use.

15 Operating lease commitments payable as a lessee

The charity's total future minimum lease payments under non-cancellable operating leases is as follows for each of the following periods

	Property	
	2022	2021
	£	£
Less than one year	41,750	229,625
One to five years	-	-
Over five years	-	-
	<u>41,750</u>	<u>229,625</u>

16 Legal status of the charity

The charity is a company 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.

Privacy International

Notes to the financial statements

For the year ended 31 January 2021

17 Impact of prior year adjustment

In previous years, income has been recognised on receipt of a grant agreement confirming funding for future years. The charity has reviewed and changed its accounting policy with respect to such income and as such, a prior year adjustment has been made. Where funding is identified as receivable in a future accounting period, the charity now considers that the income recognition criterion of entitlement is not met until that future accounting period.

Reserves position	Unrestricted £	Restricted £	Total £
Total funds at 1 February 2020 as previously stated	3,676,053	401,720	4,077,773
Adjustments to funds for income now recognised in future periods	(2,643,252)	–	(2,643,252)
Total funds at 1 February 2020 as restated	<u>1,032,801</u>	<u>401,720</u>	<u>1,434,521</u>
Total funds at 31 January 2021 as previously stated	3,680,014	528,875	4,208,889
Adjustments to funds for 2020/21 income now recognised in future periods	(1,524,673)	(156,810)	(1,681,483)
Total funds at 31 January 2021 as restated	<u>2,155,341</u>	<u>372,065</u>	<u>2,527,406</u>
Impact on income and expenditure 2020/21	Unrestricted £	Restricted £	Total £
Net income as previously reported	3,961	127,156	131,117
Adjustment for income previously recognised in 2020/21 now recognised in future periods	–	(156,811)	(156,811)
Adjustment for income previously recognised in prior periods, now recognised in 2020/21	1,118,579	–	1,118,579
Net income as restated	<u>1,122,540</u>	<u>(29,655)</u>	<u>1,092,885</u>

PRIVACY INTERNATIONAL

England & Wales - Charity number 1147471

Accounts

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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Privacy International

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

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 Holly Marie Ruthrauff Stephen Josef Tibbett Antonio Michaelides Natalie Carsey Ahana Datta Werbayne Ruthven McIntyre Professor Joshua Castellino Amanda Borton	- Resigned 31 December 2020 - Resigned 30 June 2020 - Appointed 1 February 2021 - Appointed 1 February 2021 - Appointed 1 February 2021 - Appointed 1 February 2021
Chairperson:	Eve Salomon	
Senior Statutory Auditor:	Anthony Armstrong FCA Armstrong & Co <i>Chartered Accountants & Statutory Auditor</i> 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	

Privacy International

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

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.

Privacy International

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

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

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.

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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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- 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).

Privacy International

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

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

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

Privacy International

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

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.

Privacy International

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

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.

Privacy International

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

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.

Privacy International

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

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

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

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.

Privacy International

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

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

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

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	1,074,201	(220,918)
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		(21,298)	(11,928)
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	1,403,800	1,636,646
Cash and cash equivalents at the end of the reporting period	2	2,456,703	1,403,800

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	1,074,201	(220,918)
2) Analysis of cash and cash equivalents		
Cash in hand	2,456,703	1,403,800
Total cash and cash equivalents	2,456,703	1,403,800

Privacy International

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

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.

Privacy International

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

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

Privacy International

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

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.

Privacy International

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

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

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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.

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

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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.

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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	229,625	313,125
	<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.

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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.