

Introduction

We understand that the privacy of all of our members, donors, funders, volunteers, beneficiaries, clients, suppliers is important to them and that they care about how their personal data is used. In this Privacy Policy, we refer to all of those individuals as “you” for convenience.

We respect and value your privacy and will only collect, hold, use, or share your personal data in ways that are described here, and in a way that is consistent with our obligations and your legal rights.

What does this Policy?

This Privacy Policy explains the types of your personal data that we collect, how it is collected, how it is held, how we use it, and how it is processed. It also explains your rights under data protection legislation¹ relating to your personal data. Further information about your rights can also be obtained from the Information Commissioner’s Office or your local Citizens Advice Bureau.

What is “personal data”?

Personal data is any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier. Personal data is, in simpler terms, any information about you that enables you to be identified. Personal data covers obvious information such as your name and contact details, but it also covers less obvious information such as identification numbers, electronic location data, and other online identifiers. The personal data that we collect and use is set out below.

What personal data do we collect

As a **supporter**, for example if you make a donation, register to fundraise, sign up for an event or buy merchandise, we will usually collect personal data about you such as:

- Name.
- Postal address, telephone number, email address.
- Date of birth.
- Payment details (if you are supporting us financially).
- Voluntary information to assist us in understanding our supporter base such as your reasons for supporting us or how you heard about the charity.

As a **volunteer** if you offer your time and will be engaging with our supports and beneficiaries, it is necessary for us to complete a Disclosure Barring Service check to assist us with the making of safer volunteering recruitment decisions. In addition to the above personal data the following may also be processed.

- DBS / DS Reference number, type of disclosure, date of issue
 - Volunteering placement confidential references
 - Nationality.
 - Gender.
 - Your national insurance numbers
 - Driving licence and or passport details and where necessary valid visa documentation.
 - Bank account details, salary, tax, pension status, pension entitlement and expenses details.
 - Profession and Job title.
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As a **trustee**, in addition to the personal data above we need to collect the following additional personal information which is necessary to comply with Company and Charity legislation and required to be provided to the Charity Commission.

- Home residential address
- Place of birth (In addition to date of birth)
- Citizenship
- Employment / Business Interest information including employed and voluntary position(s), any directorship(s), consultancy role(s).

It may be necessary to ask you for additional personal data for processing purposes specific to serving as a trustee, which you may not expect. If this occurs, we will ask you directly for it and we will always explain why we need it.

We will be clear with you that we wish to collect such information, our reason for collecting such information and we will only do so when we have a lawful basis for processing the information. If you are under 16, we would love you to support us, but please ensure you have the permission of your parent or guardian before giving us your personal information. You retain the right to change your preferences at any time.

Data protection law and regulation recognises certain information as 'special category' data and as being particularly sensitive. This includes: racial or ethnic origin, political opinions, religious or philosophical beliefs, trade-union membership, genetic data, certain biometric data, data concerning health or a person's sex life or sexual orientation. Sometimes we may need to collect or may indirectly obtain sensitive personal data. For example:

- You may reveal some of this information if you share photos or personal information on our website or social media channels.
- If you have signed up to support an event that may be physically demanding, we may ask you to confirm any health conditions that we or the organisers need to be aware of.
- We may gather this information for the purposes of monitoring and ensuring we provide equal opportunities to supporters and volunteers or to cater for your specific requirements when supporting us.

If you freely provide, either at our request or voluntarily, any 'special category' sensitive personal information, you explicitly agree that we may collect and use it in order to provide our services in accordance with this Privacy Policy

How we collect your personal data

We collect information about you in a variety of ways. We may collect information you provide directly to us as well as information indirectly available from other sources. The information we get from other organisations may depend on your privacy settings or the preferences you have selected with them, so you should regularly check them to fully understand how they will process and share your data.

Directly

You may give us personal data directly yourself: in order to join as a supporter or volunteer; use our websites or apps; sign up for one of our events; make a donation; purchase one of our products (such as lottery, tickets, raffles, merchandise); or communicate with us. Sometimes when you support us, your information is collected by an organisation working for us (e.g. a professional fundraising agency).

Indirectly

We may obtain your personal data indirectly when you give permission to other organisations to share it. We may purchase your personal data in a commercial transaction from a third-party organisation or alternatively make use of personal data where it is publicly available.

- **Third party organisations.** We may obtain information from third parties if you have agreed we can approach them, for example to obtain a reference or the Disclosure and Barring Service. Your information may be shared with us by organisations such as your employer or associations, only when you have indicated that you wish to support Edo Development Aid and with your explicit consent.
- **You may have provided permission** for a company or other organisation to share or sell your data with/to third parties, including charities. This could be when you buy a product or service, register for an online competition or survey, install an application on your mobile phone, or sign up with a comparison site. We can only use this data where we have been named as a recipient of the data or the third party has named a charity subsection into which we fit. We may also be provided with credit/debit card details and whether you are a tax payer for Gift Aid purposes. Like all companies, through our website and mobile apps, we may collect information about what browser you are using, your IP address and computer operating system and may use this information to improve the services we offer.
- **Social media.** Depending on your settings or the privacy policies for social media and messaging services like Facebook or Twitter, you might give us permission to access information from those accounts or services.
- **Publicly available sources.** Public information may include information from places such as Companies House, the electoral register and information that has been published in articles / newspapers. Additionally, the Post Office's National Change of Address database allows us to keep your information up to date.

Why we need it

We need your personal information in order to perform functions such as:

- **To comply with the law.** To comply with the law as a data controller and employer there are data processing purposes which must be completed. These include but are not limited to company, charity, employment, social security, social protection law and due diligence processes. Personal information collected specifically for this purpose cannot be further processed.
- **Manage your support relationship with us.** To keep a record of your relationship with us and any direction you give on how we are to comply with your data rights. To administer any donations or support your fundraising, including processing Gift Aid.
- **Communicate with you.** To know how you prefer to be contacted and to make adjustments as you specify. To provide you with specific and, where appropriate, personalised services, information, products, updates, newsletters, feedback, competitions. To assist with technical problems related to our websites or apps.
- **Operational requirements.** If you are serving as a trustee, we will make use of your collected personal information for the purposes of administering and facilitating your duties and responsibilities as a member of the Board. There may be occasions when we need to make use of your personal data because of your status as a trustee to authenticate operational requirements and executive decisions of the charity, such as providing your home address for financial due diligence validation processes. The operational use of your personal data will be compatible with the original purpose of use. If an unexpected or new purpose of use for your personal data is necessary we will inform you and / or seek your consent to make use of your personal data for this new purpose.

- **Marketing.** If you provide us with your email address or telephone number, we may contact you for marketing purposes. We may use your email or SMS text number for both marketing and targeted advertising, but only where we have your opt-in consent to do so. If you provide us with your postal address or telephone number, we may send you direct mail or telephone you about our work. We will not do so if you have told us you would prefer not to hear from us by these means. We check telephone numbers against the Telephone Preference Service (TPS) and if you are registered, we will only contact you if you have specifically consented to us making such calls. We make it easy for you to tell us how you want us to communicate, in a way that suits you. Our forms have clear marketing preference questions and we include clear information on how to opt-out or opt-in when we send you marketing information.
- **Fundraising.** The lifeblood of serving our Edo Development Aid is fundraising. We are always grateful when people donate. We endeavour to tailor our fundraising activity to ensure that we are as efficient with our resources as possible, keeping as much money available to support our beneficiaries as possible, which donors tell us is a priority for them. It also provides you with the most relevant and timely information and opportunities.
- **Profiling.** To help us achieve this tailored approach, we use profiling or wealth screening techniques, both ourselves or through trusted third-parties. We use existing information that you have supplied to us and combine this with information from publicly available sources such as charity and corporate websites and Companies House. We only use reputable sources, where someone would expect their information may be read by the public. By doing this, we can understand our supporters better and ensure we only make appropriate requests from each of you. It may help those of you who have the means, and the desire, to give a bit more.
- **To personalise and improve your supporter experience.** We may use your personal data in order to tailor our information and services to your specific needs and preferences to ensure a personalised supporter experience. To understand how we can improve our services, products or information. To provide personalised direct marketing and communication in a way that you control and that suits you.
- **To improve our services and administration.** To ensure the most efficient and appropriate use of the resources we have. To drive efficiency through statistical and market analysis.

If you choose to withhold certain personal information, we may not be able to provide you with the information, products or services you would like.

If you don't want to hear from us, or do not want us to use your data for direct marketing or profiled fundraising purposes please call us. We will retain your details on a suppression list to ensure that we respect your preferences.

The lawful basis

Data protection law and regulation require us to have a lawful basis for processing your personal information. These include:

- **Where you have given consent** to do so for notified purpose(s). This may include marketing material via e-mail or SMS or to provide you with a product, service or information that you have requested or require. Where we need your consent, it will be clearly identifiable as a consent for a specific purpose. You are able to withdraw consent at any time by contacting us, if you make this choice it may affect our continuing relationship as some services may no longer be able to be supplied.
- **To comply with a legal obligation.** For example, where we are required to do so by a court, regulatory authority the police or security services or we are legally required to, such as to

comply with social security or social protection law, such as Health and Safety, a criminal record check or in order to comply with HMRC requirements to process Gift Aid.

- **The performance of a contract.** If we are setting up or have a contract with you we will process your data to comply with the obligations of the contract.
- **Where we as a charity have a legitimate interest.** Where we have a legitimate interest, we must ensure that we are not harming any of your interests or rights and only use it in a manner that you would reasonably expect us to. For example, we have a legitimate interest in using our supporters' data, contacts and preferences for the purposes you would expect; in marketing to supporters; and research to better understand who our supporters are and to better target our fundraising activity. We also have a legitimate interest in fraud prevention and informing authorities about possible criminal acts or security threats.
- **Special category.** Where we process 'special category' personal information (such as health) we will ensure we do so in accordance with a lawful basis under Art. 6 and the additional "exception" condition for processing special category data under Art. 9 of GDPR. An example is, where a data subject has provided explicit consent or where the information has been made public by yourself.
- **To protect the vital interests of yourself or another person.** If we believe that the vital interests of you or a third party is at risk, we have a duty to protect.

How we protect your personal data.

We ensure that there are reasonable and appropriate technical and organisational controls in place to protect your personal details against unauthorised or unlawful processing and against accidental loss, destruction or damage. For example, our computers, online systems and our network are protected and routinely monitored. We have policies and procedures in place which staff and volunteers are expected to comply with and for which they receive training.

- **Online security.** Edo Development Aid will ensure that when collecting personal information over the internet that this is done securely. Our online forms are always encrypted and our network is protected and routinely monitored. If you use a credit or debit card to donate to us, buy something or make a booking online, we pass the card details securely to our payment processing partners. We are Payment Card Industry (PCI) Data Security Standard (DSS) compliant (for more information go to: https://www.pcisecuritystandards.org/pci_security/) and use external compliant providers to collect this data on our behalf. We and our partners use TLS (Transport Level Security) to encrypt data sent between you and us or our partners. We do not use cookies to store this type of information nor do we store credit or debit card details following completion of your transaction. To protect yourself when sending us sensitive information, please ensure that you use devices running supported operating systems that are regularly updated / patched and have malware protection. Only connect your devices to networks that you trust. We cannot guarantee the security of data disclosed or transmitted over public networks.
- **Password security.** Where we have given you (or where you have chosen) a password which enables you to access certain parts of our website, you are responsible for keeping the password confidential. You agree not to share that password with anyone else.
- **Third party website links.** Our website and apps may include links to other third-party websites, not owned or managed by Edo Development Aid. Whilst we try our best to only link to reputable websites we cannot be held responsible for the privacy of data collected by sites not managed by Edo Development Aid, nor can we accept responsibility or liability for the implications to you of those policies. For this reason, you should consult the privacy policy on any external website you link to before you submit any personal data.

You should be aware that the use of the Internet is not entirely secure and although we will do our best to protect your personal data we cannot guarantee the security or integrity of any personal

information which is transferred from you or to you via the Internet. Any transmission is at your own risk.

Managing access and sharing your personal data

We undertake reviews of who has access to information that we hold to ensure that your information is accessible only by the necessary and appropriately trained staff, volunteers and trusted third parties. Where we share your data with a third-party, or require you to share your personal data directly with a third party processor on our behalf, we require that they have appropriate technical and organisational measures in place to protect your information.

We treat all volunteer placement references, either received by us or provided to others by us, as confidential references. Confidentiality is applied to references because knowing the content will not be shared with the individual to which it refers or with a third party allows a referee to provide a candid reference. This is important to us as a charity, as we have a particular focus on safeguarding potentially vulnerable beneficiaries. Confidential references allow us to make good volunteer placement decisions and prevent applicants who may have a detrimental effect on our charitable activities and beneficiaries from joining us.

However, we may be compelled by law or agree to disclose your personal data to third-parties, such as law enforcement agencies, courts, government bodies or regulators. Examples include, where we believe a crime has been committed or to assist with the apprehension of an offender or when required by company, charity and social welfare law, e.g. The Charity Commission, the Information Commissioner's Office, the Health and Safety Executive, the Care Quality Commission. We have limited control over how it is processed by these parties, we therefore recommend that you consult their own privacy policies.

Trustee's personal data may be shared to comply with industry standard financial and due diligence processes, such as fraud and anti-money laundering checks, or when the charity engages in financial credit services or makes use of services to enable the electronic transfer of funds.

We may in certain circumstances share your personal data without your consent for the purpose of fulfilling our safeguarding responsibilities. This doesn't happen often, but we may share your personal data:

- If we believe there is a serious risk to the public, beneficiaries, our staff or to other professionals;
- To protect a vulnerable person, (child or adult) who we believe may be at risk, for example if they are frail, confused or cannot understand what is happening to them.
- Occasions, other than by law, when we may share your data include:
 - If you have agreed that we may do so.
 - When we use external service providers to collect or process personal data on our behalf, for example:
 - o Providing training services;
 - o To conduct a DBS Criminal records check
 - o Eligibility to drive charity vehicles,
 - o Your volunteering activities with us
 - o The appointed charity, Accounting firm, financial / credit organisation(s), bank, actuary and auditor.
- To our subsidiaries (i.e. the companies owned by Edo Development Aid.
- If we receive a complaint about any inappropriate content you have posted or transmitted to or from one of our sites, forums, social media pages or apps we may share your personal data with your internet provider or law enforcement agencies.

- To enforce or apply the Terms of Use for our website or other agreements or if we believe that we need to protect the rights, property or personal safety of Edo Development Aid, our supporters, members, visitors or websites and for other lawful purposes.
- We may disclose aggregate statistics about our supporters, volunteers, site visitors, customers and sales to describe our services and operations to prospective supporters, partners, advertisers and other reputable third parties and for other lawful purposes, but these statistics won't include any personally identifying information without your explicit consent.
- In some instances, the third parties that we work with might also retain your information for their own purposes and in these circumstances, they are also the Data Controller. Where this is the case, it will be made clear when your information is initially gathered and we recommend you look at their privacy policy for more information on how your data will be used.
- If we run an event in partnership with other named organisations your details may need to be shared. We will be very clear what will happen to your data when you register.
- If we merge with another organisation to form a new entity, information may be transferred to the new entity.

We will never rent or sell your personal information. We will not share or swap it with other organisations for their own purposes or to make money out of your data without your consent.

Where we store your information

The information that you provide to us will be held in our systems and servers, which are located in our premises or those of a trusted third-party who processes data on our behalf.

We may need to use the services or provide access and processing to service providers and other organisations located outside of the European Economic Area (EEA). This may mean your data is transferred, processed and stored outside of the EEA. However, we will put in place appropriate safeguards to protect your data and rights, such as asking for your explicit consent, using appropriate contractual clauses and / or Privacy Shield (for the US) with our third-party supplier and / or by using encryption. With the appropriate safeguards in place, by submitting your personal information, you agree to this transfer, storing or processing at a location outside the EEA. In cases when we use external websites provided by other organisations such as Twitter or Facebook, then we would ask you to consult their privacy policies too.

Retaining your information

We hold your information for only as long as is necessary to fulfil the purposes for which the data was collected and our legitimate interests or in order to comply with legal or regulatory rules and requirements.

The Data Protection Act 2018 prohibits a data controller from processing and retaining an individual's criminal record data. However, an exception applies allowing a controller to process criminal record data for the purposes of volunteer and employee recruitment. Once a recruitment process has been completed for a role, we as a controller, will not retain a copy of the DBS /DS report or any of the personal information from within the report. The only information which may be retained is:

- The date of issue of a disclosure
- The name of the subject
- The type of disclosure requested
- The position for which the disclosure was requested
- The unique reference number of the disclosure
- The details of the recruitment decision taken

While processing criminal record data for this purpose, Edo Development Aid will retain received disclosure information separately and securely. It will not be kept with an applicant's personnel file and access is strictly controlled and limited to only staff entitled to see it as part of their recruitment duties. DBS/DS content information will be securely destroyed after a period of six months (This period allows resolution of any related disputes or complaints) ensuring the information is retained for only as long as is necessary.

Where we have contracted with a 3rd party provider to process your personal data on our behalf these organisations will also retain some basic information in order to meet their own legal requirements, e.g. records of financial transactions and will only retain it for as long as is necessary.

If you decide not to support Edo Development Aid any more or request that we have no further contact with you, we will keep some basic information in order to record this to ensure we comply with your request in the future.

Your details on the internet and website

Like most organisations, our website and apps use “cookies” and other tracking software to help us make our site and the way you use it better and more relevant to you. We will not be able to personally identify you from the information gathered but it may help us improve our online services.

- Cookies mean that a website will remember you. They're small text files that are transferred to your computer (or phone or tablet). They make interacting with a website faster and easier, for example by automatically filling your name and address in text fields. Please read our cookies policy for more information. You can change your cookie preferences whenever you wish.
- When visiting our website or apps we may collect information about the type of device you're using to access them and the settings on that device. This might also include the IP address and your operating system and certain device settings as well as diagnostic information.

What are your rights?

The UK data protection legislation includes the General Data Protection Regulations (GDPR) and the Data Protection Act 2018, these two authorities are to be jointly considered as the authority of UK data protection law. This legislation gives everyone a number of very important rights. In abbreviated form these are:

- The right to be informed. Transparency over how we use your personal information. This Privacy Policy falls under this right.
- The right of access. Request information that we hold about you.
- The right of rectification. Update or amend the information we hold about you if it is incomplete or inaccurate.
- The right to erase or 'right to be forgotten'. Ask us to remove your personal information from our records where there is no compelling reason for its continued processing.
- The right to restrict processing. Ask us to suppress the processing of your information.
- The right to data portability. Obtain and reuse your personal data for your own purposes.
- The right to object. Object to the processing of your information for certain purposes (such as marketing, research, statistics or our legitimate interests).
- Rights in relation to automated decision making and profiling.

If you would like to know more about your rights under the data protection law see the Information Commissioner's Office (ICO) website. Remember, you can exercise your rights in relation to your personal information and change the way you hear from us or withdraw your permission for us to process your personal data at any time by:

- Using the 'Contact Preferences Form' on our 'Contact Us' web page;

- Through the contact details set out in the 'How to contact us' section of this policy.

If you are not satisfied with our response or believe we are not processing your personal data in accordance with the law and your rights, you can complain directly to the Information Commissioner's Office.

How can I access my personal data?

If you want to know what personal data we hold about you, you can ask us for details of that personal data and for a copy of it (where any such personal data is held). This is known as a subject access request ("SAR").

All SARs should be made in writing and sent to the email or postal address shown in paragraph 14. To make it easier for us to respond to your request as quickly as possible, you may (but do not have to) use the SAR Form in the attached Schedule a copy of which is available on request.

There is not normally any charge for a SAR. If your request is 'manifestly unfounded or excessive' (for example, if you make repetitive requests) a fee may be charged to cover our administrative costs in responding.

We will normally respond to your SAR within 21 days and, in any case, not more than one month of receiving it. Normally, we aim to provide a complete response, including a copy of your personal data within that time. In some cases, however, particularly if your request is more complex, more time may be required up to a maximum of three months from the date we receive your request. You will be kept fully informed of our progress.

How do I contact you?

To contact us about anything to do with your personal data and data protection, including to make a SAR, please use the following details:

the attention of Managing Director

Email address: admin@edodevoid.org

Phone number: 020 8902 9808

Postal Address: 32 Park Lane, Wembley, HA9 7RZ

Changes to this Privacy Notice

We may change this Privacy Notice from time to time.