



## WELCOME TO MAKE A DIFFERENCE 4 AFRICA'S WEBSITE PRIVACY POLICY

**UK registered name: MAD 4 Africa**

**UK registered charity number: 1127976**

*Updated 21<sup>st</sup> May 2018*

**Make a Difference 4 Africa** respects your privacy and is committed to protecting your personal data. This privacy notice describes how we look after your personal data when you visit our website and tells you about your privacy rights and how the law protects you.

### **1. Important information and who we are**

This privacy notice aims to give you information on how **Make a Difference 4 Africa** collects and processes your personal data through your use of this website, including any data you may provide when you contact us through this website or sign up as a supporter over the phone or via email to our supporters list. Please read this privacy notice carefully so that you are fully aware of how and why we are using your data.

The controller responsible for your personal data is Mad 4 Africa, a charitable incorporated organisation, registered under number 1127976. Our contact details are:

**Email address:** [info@mad4africa.org.uk](mailto:info@mad4africa.org.uk)

**Postal address:** 19 Ruby Rd, London E17 4RE United Kingdom

**Data privacy data manager: Troy Aitken**

The data privacy manager listed above is responsible for overseeing questions in relation to this privacy notice. If you have any questions about this privacy notice, including any requests to exercise your legal rights, please contact the data privacy manager at the above email address or by writing to us at the above postal address.

You have the right to complain at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues (<https://ico.org.uk/concerns/>). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

### **Your duty to inform us of changes**

It is important that the personal data we hold about you is accurate and current. Please let us know if your personal data changes during your relationship with us.

### **Third-party links**

This website may include links to third-party websites and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy notice of every website you visit.

## 2. The data we collect about you

Personal data means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together follows:

- **Identity Data** includes first name, last name, title and if applicable date of birth.
- **Contact Data** includes postal address, email address and telephone numbers.
- **Financial Data** includes bank details and payment information. Please be advised that we use BT My Donate to process donations and accordingly we hold very little financial data.
- **Technical Data** includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access this website.
- **Profile Data** includes your name and email address.
- **Marketing Communications Data** includes your preferences in receiving marketing from us and our third parties e.g. MailChimp who do our mailing and your communication preferences.

We do not collect any **Special Categories of Personal Data** about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data).

## 3. How is your personal data collected?

We use different methods to collect data from and about you including through:

- **Direct interactions.** You may give us your personal data by filling in forms online or by corresponding with us by post, phone, and email or otherwise. This includes personal data you provide when you:
  - Contact us via our web site
  - Request marketing to be sent to you
- **Automated technologies or interactions.** As you interact with our website, we may automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, and other similar technologies.

## 4. How we use your personal data

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- When we want to update you on our one of our projects i.e. send you a quarterly newsletter, invite you to an event or ask you to support a particular project
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal or regulatory obligation.

We rely on consent as a legal basis for processing your personal data where we send you direct marketing communications to you via email. You may withdraw your consent to marketing at any time by contacting us.

**Purposes for which we will use your personal data**

We have described below, in a table format, all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

We may process your personal data for more than one lawful ground depending on the specific context. Please contact us for details of the specific legal ground(s) we are relying on to process your personal data.

<b>Purpose/Activity</b>	<b>Type of data</b>	<b>Lawful basis for processing including basis of legitimate interest</b>
To register you on our mailing list	(a) Identity (b) Contact	Performance of a contract with you
To administer your membership (support)	(a) Identity (b) Contact (c) Marketing communications	Performance of a contract with you
To manage our relationship with you which will include:  (a) Notifying you about any changes to our terms, operations or privacy policy  (b) Asking you to provide feedback	(a) Identity (b) Contact (c) Marketing Communications	(a) Performance of a contract with you  (b) Necessary to comply with a legal obligation  (c) Necessary for our legitimate interests to keep our records updated and to study how individuals support our charity
To make suggestions and recommendations to you about events or fundraising activities that may be of interest to you	(a) Identity (b) Contact (c) Technical (d) Usage (e) Profile	Necessary for our legitimate interests to support our charitable objectives

**Marketing**

We aim to give you choices over certain personal data uses, particularly around marketing.

You will receive marketing communications from us as per the preferences you have chosen upon registering with us.

**Third-party marketing**

We will not share your personal data with any organisation outside our charity.

### **Opting out**

You may ask us to stop sending you marketing messages at any time by following the opt-out links on any marketing message sent to you or by contacting us at any time.

### **Cookies**

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly.

### **Change of purpose**

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose.

If we need to use your personal data for an unrelated purpose, we will notify you to request your consent.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

### **5. Disclosures of your personal data**

We may have to share your personal data with the parties set out below for the purposes set out in the table above.

- Third party service providers.
- Professional advisers.
- HM Revenue & Customs (e.g. for Gift Aid purposes), regulators and other authorities.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

### **6. International transfers**

Should we need to transfer your personal data out of the EEA e.g. if you reside in an area outside the EEA, we will ensure a similar degree of protection is given to you in accordance with the law and our data privacy policy.

### **7. Data security**

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employee's, and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

## 8. Data retention

How long will you use my personal data for?

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

## 9. Your legal rights

You have certain rights under data protection laws in relation to your personal data. You have the right to:

**Request access** to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.

**Request correction** of the personal data that we hold about you. This enables you to correct any incomplete or inaccurate data we hold about you. We may need to verify the accuracy of the new data you give us.

**Request erasure** of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

**Object to processing** of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights. You also have the right to object where we are processing your personal data for direct marketing purposes.

**Request restriction of processing** of your personal data. This enables you to ask us to suspend the processing of your personal data if: (a) you want us to establish the data's accuracy; (b) our use of the data is unlawful but you do not want us to erase it; (c) you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

**Request the transfer** of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine- readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

**Withdraw consent at any time** where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

If you wish to exercise any of the rights set out above, please contact us.

### **What we may need from you should you wish to access your personal data**

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

### **Time limit to respond**

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

**21<sup>st</sup> May 2018**