# Privacy Statement Malaria No More UK - August 2018

### Who we are

This is the privacy statement of **Malaria No More United Kingdom** and Malaria No More UK Trading Company

# This statement generally

This privacy statement explains how we collect and use personal information about you.

Further information can be found in the specific headings which follow and can be accessed through these links:

- <u>Types of personal information we collect</u>
- How we use your information
- <u>Where we collect your information from</u>
- Who we share your information with
- If you choose not to give us your information
- How we use your information to make automated decisions
- How long we keep your information for
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- Using our website
- Your rights
- <u>Changes to our privacy statement</u>
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# Types of personal information we collect

We may collect, use and store different types of personal information about you, which we have grouped together as follows:

Types of personal information	Description
Identity data	ID information, including your name, marital status, title, date of birth, gender and National Insurance Number. In some limited cases this will also include your driving licence number and passport information to help us arrange travel and/or process visa applications.
Contact Data	Where you live and how to contact you, including email, postal address, telephone number and Skype details.
Financial Data	Your financial position, status and history, including bank details.
Transactional Data	Details about payments to and from you (including donations).
Contractual Data	Details about the services we provide to you.
Communications Data	What we learn about you from letters, emails and conversations between us, including social media account profiles.

Social Relationships Data	Details about your family, friends and other relationships, including next of kin details.
Publicly Available Data	Details about you which are publicly available, such as on social media platforms or elsewhere on the internet.
Marketing Data	Details about your preferences in receiving marketing communications from us and our third parties.
Consents Data	Any permissions, consents or preferences that you give us.
Special Category Personal Data	<ul> <li>Some types of personal data are defined as special. We will only collect and use these types of data if the law allows us to:</li> <li>Racial or ethnic origin</li> <li>Religious or philosophical beliefs</li> <li>Trade union membership</li> <li>Genetic or bio-metric data</li> <li>Health data including gender</li> <li>Criminal convictions data</li> </ul> We do not usually collect Special Category Personal Data of our supporters unless there is a clear reason for doing so, such as participation in a marathon or similar fundraising event or where we need this information to ensure that we provide appropriate facilities or support to allow you to participate in an event. We may also record relevant health information, particularly if an individual has had malaria. This information is used to allow us to work with you in the most appropriate way possible.

# How we use your information

The table below outlines how we may use your personal information and the reasons that we rely on in doing so. Where these reasons include legitimate interests, we explain what these legitimate interests are.

What we use your information for	Our reasons	Our legitimate interests
Generally		
• To provide you with services and contact you in the course of carrying out our functions and operations as a charity	Legitimate interests	<ul> <li>To run our charity efficiently</li> <li>To keep a record of your relationship with us</li> </ul>
<ul> <li>To process a donation you have made</li> </ul>	Legitimate interests	<ul> <li>To process donations securely</li> </ul>
<ul> <li>To run our charity in an efficient and proper way. This includes managing our financial position, capability, planning,</li> </ul>	<ul> <li>Legitimate interests</li> <li>Contractual performance</li> <li>Legal obligations</li> </ul>	<ul> <li>To manage our relationship with you and fulfilling our responsibilities generally</li> </ul>

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communications, corporate governance and audit		<ul> <li>To keep a record of your relationship with us</li> </ul>
governance and addit		
To manage our relationship with	Legitimate interests	To keep you updated about
you which will include notifying	<ul> <li>Contract performance</li> </ul>	changes in the legal terms that apply to the use of our
you about changes to our		website
privacy statement		<ul> <li>Record keeping and firm</li> </ul>
		management
To register you as a visitor when	<ul> <li>Legal obligations</li> </ul>	Prevention of crime and public
you visit our premises and	<ul> <li>Vital interests</li> </ul>	safety (including the safety of
ensure your health and safety	<ul> <li>Legitimate interests</li> </ul>	<ul><li>our own employees)</li><li>Security of our premises</li></ul>
when you are on our premises		<ul> <li>Incident/breach reporting,</li> </ul>
		management and
		<ul> <li>To ensure your health and safety whilst on our premises</li> </ul>
		salety whilst on our premises
Prevention of crime and public	<ul> <li>Legal obligation</li> </ul>	Managing the risk of crime
safety, including through the use	<ul> <li>Legitimate interests</li> </ul>	and safety for us, our
of CCTV		employees and our clients
		<ul> <li>Developing and improving how we deal with crime</li> </ul>
		<ul> <li>Reporting criminality or the</li> </ul>
		suspicion of criminality for the
		wider benefit of society
		Being efficient about how we
		fulfil our responsibilities
To comply with legal or	Legal obligation	To be efficient about how we
regulatory requirements	<ul> <li>Legitimate interests</li> </ul>	comply with our legal duties
		To protect our reputation
To establish, enforce and defend	Legal claims	To comply with laws and
legal claims	<ul> <li>Legitimate interests</li> </ul>	regulations that apply to us
		To respond to questions or
		complaints
		To maintain records to
		evidence matters that may be in dispute
Fundraising, marketing and commu	inications	
Fundraise to support our	Legitimate interests	To raise funds to support the
charitable work by seeking		charitable work we undertake
donations and other financial		
support		
Marketing and business	Legitimate interests	To develop our relationship
development activities, to include	Consent	with you and others
sending marketing		<ul> <li>To hold events to promote our charity and its services</li> </ul>
communications and fundraising		<ul><li>our charity and its services</li><li>To target opportunities for</li></ul>
materials to you, promoting our charity, campaigns we		future fundraising and events
chanty, campaigns we	L	

		<b>—</b>
coordinate or convene and events management.		<ul> <li>Telling you about developments that might interest you</li> <li>To ensure we know how you prefer to be contacted</li> <li>Seeking your consent if we need it to contact you</li> </ul>
Events management	Legitimate interests	<ul> <li>To hold events to promote our charity and its services</li> <li>To manage attendance at any event we organise, including security and health and safety arrangements</li> </ul>
<ul> <li>To manage the systems that contain our marketing database</li> <li>Managing marketing preferences and keeping our records up to date</li> </ul>	<ul><li>Legitimate interests</li><li>Consent</li></ul>	<ul> <li>Data management for marketing and business development purposes</li> <li>Improving our systems and services</li> <li>Seeking feedback</li> <li>Seeking your consent when we need it to contact you</li> </ul>
To use data analytics to improve our marketing, supporter relationships and experiences	<ul><li>Legitimate interests</li><li>Consent</li></ul>	<ul> <li>Improve our marketing strategy and the services that we provide</li> </ul>
Press and media relations	<ul><li>Legitimate interests</li><li>Consent</li></ul>	<ul> <li>To contact you to publicise our work through press releases and other published material, subject to obligations of confidentiality</li> </ul>
When you visit our website		
<ul> <li>To provide you with information you may ask for, including updates on our campaigns</li> </ul>	<ul><li>Consent</li><li>Legitimate interests</li></ul>	<ul> <li>To fulfil enquires you might make of us and provide you with relevant information that might interest you</li> </ul>
<ul> <li>To allow you to register for events that we may be hosting</li> </ul>	<ul><li>Consent</li><li>Legitimate interests</li></ul>	<ul> <li>To hold events to promote our charity</li> </ul>
<ul> <li>To administer and protect our charity and websites (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)</li> </ul>	Legitimate interests	To ensure that our technology operates efficiently and without error
<ul> <li>To manage our relationship with you which will include notifying you about changes to our website terms and conditions</li> </ul>	<ul><li>Legitimate interests</li><li>Contract performance</li></ul>	<ul> <li>To keep you updated about changes in the legal terms that apply to the use of our website</li> <li>Record keeping and firm management</li> </ul>

<ul> <li>Recruitment and volunteering (if your second second</li></ul>	ou are applying for a job or wan <ul> <li>Employment purposes</li> <li>Legal obligation</li> <li>Legitimate interests</li> </ul>	<ul> <li><i>t to volunteer with us</i>)</li> <li>Recruitment and resourcing</li> <li>Pre-employment screening</li> <li>To decide whether to recruit you for the role</li> <li>To check whether you are legally entitled to work in the</li> </ul>
<ul> <li>To keep records related to our hiring processes</li> </ul>	<ul> <li>Employment purposes</li> <li>Legitimate interests</li> </ul>	<ul> <li>United Kingdom</li> <li>To decide whether to enter into a contract of employment with you</li> <li>To comply with regulations that apply to us</li> <li>Risk management</li> <li>To run our business in a proper and efficient way.</li> </ul>
• We will use information about your disability status to determine whether we need to provide appropriate adjustments during the recruitment process	<ul> <li>Employment obligations</li> <li>Legal obligation</li> <li>Legitimate interests</li> </ul>	<ul> <li>Recruitment and resourcing</li> <li>To allow us to implement appropriate adjustments</li> <li>To comply with regulations that apply to us</li> </ul>
• We will use information about your race or national or ethnic origin, religious, philosophical or moral beliefs, or your sexual life or sexual orientation, to ensure meaningful equal opportunity monitoring and reporting.	<ul> <li>Employment obligations</li> <li>Legal obligation</li> <li>Legitimate interests</li> </ul>	<ul> <li>Recruitment and resourcing</li> <li>To allows us to implement meaningful equal opportunity monitoring and reporting within our organisation</li> <li>To comply with regulations that apply to us</li> </ul>

# Where we collect your personal information from

We may collect your personal information from the following sources:

- Directly from you (e.g. when you talk to us over the phone or email us)
- Indirectly from you (e.g. from independent event organisers like the London Marathon, or fundraising sites such as JustGiving or Virgin Money Giving or from partners running appeals to raise money for our work or from our individuals capturing data from donate forms / sponsorship forms and then passing them on to us)Social networking sites
- Publicly available resources, such as Companies House or online
- Market researchers

- Analytics providers, such as Google Analytics
- Recruitment agencies, background check providers and credit reference agencies
- Former employers or other referees
- CCTV footage
- Intermediaries

## Who we share your information with

We follow the charity-specific guidance issued from time to time from the Code of Fundraising Practice issued by the Fundraising Regulator, as well as other. In line with this guidance, we will not sell or rent your personal information to third parties but we may share your personal information with the following third parties:

- Our CRM service provider and e-commerce infrastructure
- Other companies and service providers who we use to help us carry out our functions as a charity, (such as fundraising agencies, direct mailing companies, affiliate marketing partners and software platform providers
- Our staff, trustees, volunteers and consultants
- Law enforcement agencies
- Relevant regulators, including the Fundraising Regulator and Information Commissioner's Office in the event of a personal data breach
- Our insurers
- Recruitment agencies (when providing feedback on candidates)
- Benefits providers
- Journalists and other members of the media

Beyond this, we will only share your personal information with another organisation where you have given us your explicit consent to do so, unless we are obliged to do so by law.

## If you choose not to give your personal information

Where we need to collect your personal information in order to meet our legal obligations or under the terms of a contract we have with you and you fail to provide that data when requested, it may delay or prevent us from being able to perform the contract we have entered into with you and/or comply with our own legal obligations as a charity.

## How we use your information to make automated decisions

You will not be subject to decisions that will significantly impact on you based solely on automated decision-making.

#### How long we keep your personal information

#### <u>Generally</u>

We review our retention periods for personal information on a regular basis. We are legally required to hold some types of information to fulfil our statutory obligations (for example the collection of Gift Aid). We will hold your personal information on our systems for as long as is necessary for the relevant activity, or as long as is set out in any relevant contract you hold with. Where your information is no longer required, we will ensure that it is disposed of in a secure manner.

## If you are a job applicant or prospective volunteer

We will retain your personal information for a period of six months after we have communicated to you our decision about whether to appoint you to the role. We retain your personal information for that period so that we can show, in the event of a legal claim, that we have not discriminated against candidates on prohibited grounds and that we have conducted the recruitment exercise in a fair and transparent way.

After this period, we will securely destroy your personal information in accordance with our data retention policy which you can request from us at any time.

If we wish to retain your personal information on file, on the basis that a further opportunity may arise in the future and we may wish to consider you for that, we will write to you separately, seeking your explicit consent to retain your personal information for a fixed period on that basis.

## Where we hold your personal information internationally

We do not transfer your personal information outside the European Economic Area (EEA).

### Using our website

Websites administered by us including <u>www.malarianomore.org.uk</u> and others use cookies. We use cookies to improve the functionality of our websites. Cookies mean that a website will remember you. They make interacting with a website faster and easier (e.g. by automatically filling your name and address into text fields)

In addition, if you subscribe to one of our campaigns or submit a message to one of our websites, the following will also apply:

- All Malaria No More United Kingdom websites collect personal information when you register with us;
- The website you sign up to will collect information such as your name, postcode and email address. Once you register with that website, you will not be anonymous to us when you sign in; and
- We use cookies to allow us to store limited information on an individual's computer.

## Your rights

- Access to your information You have the right to request a copy of the personal information about you that we hold.
- *Correcting your information* We want to make sure that your personal information is accurate, complete and up to date and you may ask us to correct any personal information about you that you believe does not meet these standards.
- **Deletion of your information** You have the right to ask us to delete personal information about you where:
  - You consider that we no longer require the information for the purposes for which it was obtained
  - We are using that information with your consent and you have withdrawn your consent see Withdrawing consent to using your information below
  - You have validly objected to our use of your personal information see *Objecting to how we* may use your information below
  - Our use of your personal information is contrary to law or our other legal obligations.
- **Objecting to how we may use your information** You have the right at any time to require us to stop using your personal information for direct marketing purposes. In addition, where we use your personal information to perform tasks carried out in the public interest or pursuant to the legitimate interests of us or a third party then, if you ask us to, we will stop using that personal information unless there are overriding legitimate grounds to continue.
  - **Restricting how we may use your information** in some cases, you may ask us to restrict how we use your personal information. This right might apply, for example, where we are checking the accuracy of

personal information about you that we hold or assessing the validity of any objection you have made to our use of your information. The right might also apply where this is no longer a basis for using your personal information but you don't want us to delete the data. Where this right to validly exercised, we may only use the relevant personal information with your consent, for legal claims or where there are other public interest grounds to do so.

- **Portability** if we process personal information that you provide to us on the basis of consent or because it is necessary for the performance of a contract to which you are party, and in either case that processing is carried out by automated means, then you have the right to have that personal information transmitted to you in a machine readable format. Where technically feasible, you also have the right to have that personal information transmitted directly to another controller.
- **Automated processing** if we use your personal information on an automated basis to make decisions which significantly affect you, you have the right to ask that the decision be reviewed by an individual to whom you may make representations and contest the decision. This right only applies where we use your information with your consent or as part of a contractual relationship with you
- *Withdrawing consent using your information* Where we use your personal information with your consent you may withdraw that consent at any time and we will stop using your personal information for the purpose(s) for which consent was given.

Please contact us in any of the ways set out in the *Contact information and further advice* section if you wish to exercise any of these rights.

### Changes to our privacy statement

We keep this privacy statement under regular review and will place any updates on this website. Paper copies of the privacy statement may also be obtained from the Operations Manager of Malaria No More UK

This privacy statement was last updated in August 2018

#### Contact information and further advice

**Operations Manager** 

Malaria No More UK

The Foundry

17 Oval Way

London

**SE11 5RR** 

privacy@malarianomore.org.uk

020 3752 5862

#### Complaints

We seek to resolve directly all complaints about how we handle personal information but you also have the right to lodge a complaint with the Information Commissioner's Office:

Online: https://ico.org.uk/global/contact-us/email/

By post: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, SK9 5AF

## Malaria No More UK – Corporate information

**Malaria No More United Kingdom** is a company limited by guarantee (company number 06648679) having its registered office at The Foundry, 17 Oval Way, London, SE11 5RR.

Registered charity number: 1126222.

**Malaria No More UK Trading Co** is a company limited by guarantee (company number 7621448 having its registered office at The Foundry, 17 Oval Way, London, SE11 5RR