### Rahela Trust

# **Privacy Policy**

## **Updated February 2023**





Charity Number: 1165763

#### **Privacy Policy**

Rahela Trust is a registered charity in the UK 1165763. Our registered address is 28 Burns Close, Welling, DA16 3NJ, UK. We are a Trust seeking to provide higher education and leadership mentoring to academically talented and disadvantaged women in rural Afghanistan, as well as build connections between the Afghan diaspora in the UK and Europe.

We take protecting your privacy very seriously and will always take all reasonable steps within our power to make sure your information is safe.

This privacy policy applies to all personal information we collect or process about you. Personal information is information, or a combination of pieces of information, that could reasonably allow you to be identified. We aim to fully comply with data protection legal requirements as issued by the General Data Protection Regulations (GDPR) 2018 and with the Privacy and Electronic Communications Regulations (PECR) 2003 (and amendments).

#### Rahela Trust holds data

- as a fundraising organisation, that has donors and supporters
- as an employer, processing personal data of trustees, employees and volunteers

#### This statement covers the following

- what information we may collect about you
- how we store your personal information and for how long
- · what we use your personal information for
- who (if anyone) we pass it on to and how they use it.

If we do wish to use your personal information for an additional purpose, we will always ask you to agree to this first.

#### **Donors and Supporters**

We may collect the following personal information about you:

- your name, address, contact telephone numbers and email address
- Gift Aid declarations
- any other information that you may choose to give to us
- your personal contact preferences.

We may get this information from:

- 1. you
- 2. anyone you ask to give this information to us, on your behalf (such as your family or friends).
- 3. anyone who has a Power of Attorney to act as your attorney.

We may also collect images, photographs or video if you volunteer or take part in an event with us, unless you request not to be photographed.

We do not collect any special categories of personal data, such as date of birth or any personal financial data such as bank details or credit card details. (Please note: some special categories of personal information will be collected and stored for trustees, staff and occasionally volunteers. See below.)

#### Where we store your personal information

We are committed to holding your personal information securely. This means only those of our trustees and staff who need to see it, have access. Where personal information is held electronically, it is held on our computer system that is owned and controlled by us. Your information can only be accessed by us.

We use computers (laptops) that are password-protected and always under our control. Any information passed electronically is encrypted and protected.

Rahela Trust operations are based in the UK and we store our data within the European Union.

#### How long we store information

We will only use and store information for so long as it is required for the purposes it was collected for. How long information will be stored depends on the information in question and what it is being used for.

There are certain documents we must retain for longer such as Gift Aid declarations for future audit by HMRC. We have a legal requirement to retain Gift Aid declarations and any paper applications for seven years, but for some regular donations the Gift Aid Declarations are required to be held longer, until the donation has ceased.

We continually review what information we hold and delete what is no longer required.

What we use your personal information for:

- sending out newsletters and other communications to keep our donors and supporters up to date with the charitable work that you are enabling Rahela Trust to fund in Afghanistan
- administration of donations including the processing of Gift Aid
- keeping you up to date about our events and activities and the opportunities that you can take to support us and our work through volunteering and participation.

#### How we legally process your data

We are processing your data on a 'legitimate interest' basis.

Legitimate interest involves a three-part test.

- Identify the legitimate interest. This includes why we collect your data, what we do with it and what information you receive from us as part of our purpose to inform you regarding the Trust's interests.
- Show that processing your data is necessary. This means we will process your personal information only to meet our legitimate interest.
- Balance this against all individual's rights. We have to let you know what we are doing with your data and ensure that any data we hold, and process, would not cause you harm in any way.

We ask you for your contact preferences. These will be used to deliver information to you in the way you prefer. Newsletters will be issued by post unless you have asked us to send them electronically.

#### Fundraising and marketing

As a charity, we rely on donations and support from others to continue our work.

We understand that asking for your support is marketing and you can, of course, unsubscribe from our communications at any time.

#### Who else we may pass on your information to and receive information from:

Normally, we will be the only people who are able to access your personal information.

We do not pass on our supporter's details to any other organisations except for the following administrative and legal purposes:

- IT providers who provide support to us to manage the computers, phones, systems or software that we use
- HMRC for Gift Aid Claims
- our professional advisors
- any organisation that may help us in printing and sending out our newsletters
- your trustees, deputies, attorneys and other legally-recognised appointees

We may sometimes be required to disclose your personal data by law, such as by a regulator with appropriate power, or court order.

We will not sell, distribute or lease your personal information to third parties unless we are required by law to do so.

We also receive personal information from LaunchGood when you fundraise or donate through them and from PayPal.

#### Specific category of persons trustees, staff and volunteers

For trustees, staff and some volunteers more specific personal information (mainly date of birth) is collected as needed to comply with legal requirements. We treat this personal data in the same way as personal data held for donors and supporters.

#### Your legal rights as regards your personal data are as follows

- 1. the right to confirmation as to whether or not we have your personal data and, if we do, to obtain a copy of the personal information we hold (this is known as a subject access request)
- 2. the right to have your data erased (though this will not apply where it is necessary for us to continue to use the data for a lawful reason)
- 3. the right to have inaccurate data rectified
- 4. the right to object to your data being used for marketing or profiling
- 5. where technically feasible, you have the right to personal data you have provided to us which we process automatically on the basis of your consent or the performance of a contract. This information will be provided in a common electronic format

#### Accessing and changing the information we have about you

You have a legal right to access information that we hold about you. You can contact us at any time by email, letter or telephone to change or update your details or obtain a copy of your record.

#### If you have any problems or queries about your data, please contact us at:

info@rahelatrust.org

We will respond to your request within one month of receipt. We may not be able to provide you with your request if your personal information contains details about another person and we do not have their permission to give it to you.

#### Financial security

All our online transactions for donations are currently processed through PayPal. PayPal websites use the SSL (Secure Sockets Layer) protocol for encryption. Most browsers (Microsoft Explorer, Mozilla Firefox, Safari, etc.) support SSL. The link between your browser and the server is secure if your browser displays a small padlock or key symbol somewhere in the frame, or the address bar shows a web address beginning https:// (rather than http://).

When you are using our secure online page, you are going through PayPal and the information you give such as credit card number and contact information is provided so that the transaction can take place. We do not receive this personal financial data, only the contact details that you provide.

#### Notification of change of Privacy Policy

Rahela Trust will review and amend this Privacy Policy from time to time. Notice of any change will be posted on our website and will be deemed effective on publication.

#### Complaints

You can complain to Rahela Trust directly by contacting our trustees using the details set out above. If you are not happy with our response, or you believe that your data protection or privacy rights have been infringed, you can complain to the UK Information Commissioner Office which regulates and enforces data protection law in the UK. Details of how to do this can be found at <a href="https://www.ico.org.uk">www.ico.org.uk</a>