



PRIVACY STATEMENT

Version: 1.0

Date: 15/05/2018

We take your privacy seriously and will only use your personal information to administer your account and to provide the products and services you have requested from us. We will never sell, share or use your personal information other than as described here.

About this Privacy Policy

This policy sets out how we will use and share the information that you give us. This policy describes your relationship with Watoto Child Care Ministries.

Who we are and how to contact us

Watoto Child Care Ministries, charity number 1090810, is the registered charity name and number of Watoto Child Care Ministries here in England and is registered with the Information Commissioner's Office under the Data Protection Act 1998. The data controller is: WATOTO CHILD CARE MINISTRIES. You can get in touch with us in any of the following ways:

Email: uk@watoto.com

Phone: 02032251048

Website: www.watoto.com

Post: Suite 2 James Yard, Larkshall Road, Highams Park, E4 9UA

How to change your preferences

You can contact the Watoto UK office Monday to Friday from 9am to 5pm to change or update your preferences at any time.

How we operate

We operate in line with EU General Data Protection Regulations (GDPR) (from May 2018). We are committed to maintaining your personal rights and allow all supporters to change or withdraw their opt-in options at any time. We will also advise you on how to complain to the relevant authorities, namely the Information Commissioner's Office.

Who this privacy policy applies to

Watoto Child Care Ministries is an established international organisation, which was set up as a compassionate response to the plight of the millions of children across Africa who have been orphaned as a result of HIV/AIDS. Watoto Child Care Ministries is Head-quartered in Uganda and has various country offices around the world.

This policy is in line with the General Data Protection Regulations for the EU countries and relates to supporters of Watoto Child Care Ministries in this region. It applies to individuals who have registered with Watoto Child Care Ministries as a sponsor, donor, Watoto Children's Choir host, visitor, volunteer, customer and administrator or in any other capacity. Processing of your data is required in order to offer you these services.

Sensitive Data

We do not collect any sensitive data, except for Visit Watoto team members and individual volunteers. The sensitive data we collect includes details about their health and religious beliefs.

What this policy applies to

This section describes the lawful basis for processing your data and applies to the information about yourself that you choose to provide us with or that you allow us to collect. This includes:

- Information you provide when you set up your sponsorship/donation
- Information you provide when you sign up for our email updates
- Information you provide in forms for visit Watoto trips or volunteering
- Information you provide related to Watoto Children's Choir enquiries and bookings
- Information you provide when you use our website
- Information relating to purchases and other transactions
- Information given and stored as part of our ongoing relationship

Scope of Consent

By submitting your personal data to us, you are affirming your explicit consent for such information to be used in accordance with the intended purpose and this privacy policy. You will be able to withdraw that consent at any time by the methods described.

Opting out at a later date

Once you have given your consent, you can amend or withdraw your consent at any time. You can also choose to object to processing at any time. We respect all user rights as defined in GDPR. If you have any comments or wish to complain, please contact us at any time.

Under certain circumstances, you have rights under data protection laws in relation to your personal data. These include the right to:

- Request access to your personal data.
- Request correction of your personal data.
- Request erasure of your personal data.
- Object to processing of your personal data.
- Request restriction of processing your personal data.
- Request transfer of your personal data.
- Right to withdraw consent.

You can see more about these rights at: <https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/>

How we store and process your data

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.

By law we have to keep basic information about our supporters and customers (including Contact, Identity, Financial and Transaction Data) for six years. In some circumstances you can ask us to delete your data: see below for further information.

Your personal data will be stored and processed in the UK. For sponsors and regular donors we also employ a bespoke CRM (Customer Relationship Management) database to manage their sponsorship and donations. The database server is located in Canada. Please note that the Watoto sponsorship department in Uganda has access to this database. Your data will be stored as described here or until you request removal of your personal data from our system.

We use recognised third parties to take payment, manage our company accounts and provide banking services. We will store transactions, payment (this does not include payment card data) and order data for up to 7 years or for as long as required by UK financial and company regulations. These third parties may operate outside the EU.

We will only use your personal data when legally permitted. Article 6.1 of the GDPR states that “processing shall be lawful only if and to the extent that at least one of the following applies:

- a. the data subject has given consent to the processing of his or her personal data for one or more specific purposes;
- b. processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract;
- c. processing is necessary for compliance with a legal obligation to which the controller is subject;
- d. processing is necessary in order to protect the vital interests of the data subject or of another natural person;
- e. processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller;
- f. processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data, in particular where the data subject is a child.”

Set out below is a description of the ways we intend to use your personal data and the lawful basis (as set out above) on which we will process such data. We have also explained what our legitimate interests are where relevant. We may process your personal data for more than one lawful basis, depending on the specific purpose for which we are using your data. Please contact us if you need details about the specific lawful basis we are relying on to process your personal data as set out in the table below.

PURPOSE/ACTIVITY	TYPE OF DATA PROCESSED	LAWFUL BASIS FOR PROCESSING
To process your sponsorship or donation	- Identity - Contact	(a) Given consent to the processing of personal data for a specific purpose (b) Performance of a contract with you
To administer finance, including sponsorships, donations and Visit Watoto, volunteer and Watoto 360 payments	- Identity - Contact - Financial - Transaction	(a) Given consent to the processing of personal data for a specific purpose (b) Performance of a contract with you
To process and deliver your order including managing payments, fees and charges	- Identity - Contact - Financial - Transaction	(b) Performance of a contract with you
To enable you to attend a Watoto event	- Identity - Contact - Financial (where applicable) - Transaction (where applicable)	(a) Given consent to the processing of personal data for a specific purpose (b) Performance of a contract with you (f) Necessary for our legitimate interests, such as studying event attendance
To maintain our relationship with sponsors/donors and provide operational information through letters, Christmas updates, fundraising campaigns and our annual report	- Identity - Contact	(a) Given consent to the processing of personal data for this specific purpose (f) Necessary for our legitimate interests, such as sponsor/donor care and promoting our work
To promote our work through email updates, campaigns and newsletters	- Identity - Contact	(a) Given consent to the processing of personal data for this specific purpose (f) Necessary for our legitimate interests, such as sponsor/donor care and promoting our work, where it is not in conflict with the interests or fundamental rights and freedoms of the individual
To administer your visit, team trip or volunteer activities	- Identity - Contact - Sensitive Data	a) Given consent to the processing of personal data for this specific purpose (d) Processing is necessary in order to protect the vital interests of the individual
To administer and protect our business and our site (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	- Identity - Contact - Technical	c) Necessary to comply with a legal obligation (f) Necessary for our legitimate interests for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise

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 you wish to find out more about how the processing for the new purpose is compatible with the original purpose, please email us. If we need to use your personal data for a purpose unrelated to the purpose for which we collected the data, we will notify you and we will explain the legal ground of processing.

We may process your personal data without your knowledge or consent where this is required or permitted by law.

Communications

Sponsors will receive our Christmas updates as well as letters from the UK office and sponsored individual as part of your sponsorship administration.

You will receive email updates, fundraising campaigns and newsletters from us if you have opted in, for example through our website and forms, at Watoto events or by phone/email in response to the GDPR consent requirement.

You can withdraw your permission to receive our emails at any time by using the unsubscribe link found at the bottom of our email updates, fundraising campaigns and newsletters.

Our obligations

Watoto Child Care Ministries is the data controller. In relation to the information that you provide to us, we are legally responsible for how that information is handled. We will comply with the Data Protection Act 1998 and the GDPR (2018) in the way we use and share your personal data. Among other things, this means that we will only use your personal data:

- Fairly and lawfully
- As set out in the legislation and this policy
- To the extent necessary for intended purposes

We will process your personal data ourselves as the data processor. We will take reasonable precautions to safeguard the personal information that you provide.

Watoto Child Care Ministries may from time to time use your information for account management or relationship management purposes. The main purpose of this is to maintain the existing relationship we have with you, to thank you for your support and to provide you with information about our work and events.

Third Parties

We may have to share your personal data with the parties set out below for the purposes set out in table 1:

- Service providers who provide IT and system administration services.
- Professional advisers including bankers, auditors and insurers who provide consultancy, banking, legal, insurance and accounting services.
- HM Revenue & Customs, regulators and other authorities based in the United Kingdom and other relevant jurisdictions who require reporting of processing activities in certain circumstances.

We require all third parties to whom we transfer your data to respect the security of your personal data and to treat it in accordance with the law. We only allow such third parties to process your personal data for specified purposes and in accordance with our instructions.

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 employees, service providers and other third parties who have a business “need to know” of such data. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so. We will report any breaches or potential breaches to the appropriate authorities within 24 hours and to anyone affected by a breach within 72 hours.

If you have any queries or concerns about your data usage, please contact us.

Contacting us, exercising your Information Rights and Complaints

If you have any questions or comments about this Privacy Policy, wish to exercise your information rights in connection with the personal data you have shared with us or wish to complain, please contact: The Data Protection Officer at Watoto Child Care Ministries. We will process SARs (Subject Access Requests) within 20 working days. We fully comply with Data Protection legislation and will assist in any investigation or request made by the appropriate authorities.