## PRIVACY POLICY

## Last updated: 2 November 2018

Elrha is committed to protecting your privacy and personal information and complies with the principles of the relevant data protection regulations. This privacy policy explains how and why we collect your personal information and how we use it.

## HOW DO WE COLLECT YOUR INFORMATION?

We may collect information about you directly whenever you interact with us. For example, when you contact Elrha regarding our activities, sign up to an event, apply for funding or engage with our social media, you may provide us with your personal information.

We may collect aggregated or anonymous information when you visit our website or interact with our content. For example, we may collect information about the services you use and how you use them, like when you watch a video on Vimeo, visit our website or view and interact with our ads and content.

## WHAT INFORMATION DO WE COLLECT?

The information we collect from you directly may include:

- name
- address
- email address
- telephone number
- contact preferences
- occupation
- organisation you work for
- your humanitarian interest and background

We may also collect and process information about your interactions with us, including details about our contact with you through email, post, on the phone or in person (i.e., the date, time, and method of contact), details about events that you register for or attend and any other support you provide to us. We may also collect and record any other relevant information you share with us about yourself, including your interests.

## DO WE PROCESS 'SENSITIVE' PERSONAL INFORMATION?

Under data protection law, certain categories of personal information are recognised as sensitive, including health information and information regarding race, religious beliefs, and political opinions. This is known as 'sensitive personal data'. We do not

routinely collect sensitive personal data, but we will collect this information where there is a clear reason for doing so, such as where we need this information to ensure we provide appropriate facilities or support to enable you to participate in an event.

## HOW DO WE USE YOUR INFORMATION?

We may use your information in a number of ways, including:

- In relation to correspondence you have with us (whether by letter, email, text, social media, message board or any other means);
- For internal record keeping;
- To fulfil contracts you have entered into with Elrha;
- To contact you about any content you provide;
- To invite you to participate in surveys or research about Elrha or our work (participation is always voluntary);
- To provide you with information, products or services that you have requested from us or that we feel may be of interest to you;
- To provide you with information about our work or our activities;
- For administrative purposes [for example, we may contact you regarding an event for which you have registered];
- To contact you where you have been identified as a contact person for an organisation, such as a humanitarian non-governmental organisation (NGO) [if we obtain your contact details in this way, we will only use them to contact you in your capacity as a representative of that organisation];
- To analyse and improve the content and operation of our website;
- To analyse and improve our internal business processes;
- To tailor advertising that is presented to you on the Internet according to your interests, preferences and other characteristics (as described below);
- To direct advertisements and other communications to other people who may have similar interests or other characteristics to yours (as described below);
- To assess your personal information for the purposes of credit risk reduction or fraud prevention; and
- Where we are required by law to disclose or otherwise use your information.

In particular, we may contact you for marketing purposes by email if you have agreed to be contacted in this manner.

If you have provided us with your postal address or telephone number, we may send you information about our work or other communications of the kinds described



above by direct mail or contact you by telephone unless you have told us that you would prefer not to hear from us in this way. We provide information about how you can change your marketing preferences below.

# HOW DO WE DISCLOSE INFORMATION WE HAVE COLLECTED TO OUTSIDE PARTIES?

We will never sell your details and, except as indicated below, will only share your details with third parties (who are not service providers working at our direction) if you ask us to. We do not make cold telephone calls to members of the general public and, therefore, will not purchase your data in order to do so.

We may disclose your personal information if we are requested or required to do so by a regulator or law enforcement or in order to enforce or apply our rights (including in relation to our website or other applicable terms and conditions) or to protect Elrha, for example in cases of suspected fraud or defamation, or in order to comply with any other applicable legal obligation.

If you receive funding from Elrha, we may share relevant personal information with our donors, evaluators or auditors if we are contractually or legally obliged to, or to support evaluation and learning from our work. For example, we may share the information contained within a funding application you submitted to us for an external evaluation of our work.

If you have ever applied to Elrha for funding but the application was unsuccessful, we may still share the information held within an application for the purposes outlined above.

## HOW DO WE PROTECT YOUR PERSONAL INFORMATION?

We take appropriate physical, electronic and managerial measures to ensure that we keep your information secure, accurate and up to date, and that we only keep it as long as is reasonable and necessary.

Although we use appropriate security measures once we have received your personal information, the transmission of information over the internet is never completely secure. We do our best to protect personal information, but we cannot guarantee the security of information transmitted to our website, so any transmission is at the user's own risk.

For financial and technical reasons, we may, on occasion, need to use the services of a service provider outside the European Economic Area (EEA) – this may include a country which does not have the same level of data protection as in the United Kingdom. However, unless they are located in a country which has been assessed by the European Commission as ensuring an adequate level of protection for

personal data, we will only use a service provider outside the EEA on the basis of an agreement with the service provider, designed to protect your data, in the appropriate form approved for this purpose by the European Commission. We will take all steps reasonably necessary to ensure that your data is processed securely and in accordance with this Privacy Policy.

## HOW CAN YOU CHANGE YOUR MARKETING PREFERENCES?

If you do not wish us to use your personal data for marketing purposes as outlined above, you can update your preferences at any time (including telling us that you don't want us to contact you for marketing purposes) by:

- Indicating that you do not wish to receive our marketing emails by clicking the <u>'unsubscribe'</u> link in at the end of our marketing emails;
- Contacting us via email <a href="mailto:info@elrha.org">info@elrha.org</a> or by writing to us at:

Elrha 1 St John's Lane London EC1M 4AR

If you have indicated that you do not wish to be contacted for marketing purposes, we will maintain your details on a suppression list to help ensure that we do not continue to contact you for marketing purposes. However, we may still need to contact you for administrative purposes, including (but not limited to):

- Sending correspondences regarding a live funding grant where you are the grantee and Elrha is the funder
- Providing you with the information you need in order to participate in an event for which you have registered
- Explaining and apologising where we have made a mistake

# HOW CAN YOU UPDATE, CORRECT, OR DELETE YOUR PERSONAL INFORMATION?

The accuracy of your information is really important to us. We want to ensure that we are able to communicate with you in ways that you are happy with, and to provide you with information that is of interest. If you wish to change how we communicate with you, update the information we hold, or have questions about this Privacy Policy then please contact us:



Contacting us via email <u>info@elrha.org</u> or by writing to us at:

Elrha 1 St John's Lane London EC1M 4AR

## WHY ARE WE ALLOWED TO PROCESS YOUR PERSONAL INFORMATION?

Our Privacy and Cookie Policies take into account several laws, including:

- the Privacy and Electronic Communications (EC Directive) Regulations 2003
- General Data Protection Regulation (EU) 2016/679, which came into force in the UK on May 25, 2018 and replaced the Data Protection Act 1998.

Generally, our processing of your personal information as described in this policy is allowed by these laws because we have a legitimate need to carry out the processing for the purposes described above. Some processing may also be necessary so that we can perform a contract with you or because it is required by law. We only use your information to send you marketing communications by email with your consent, and you can always opt out of receipt of marketing communications as explained.

## HOW LONG DO WE HOLD YOUR PERSONAL INFORMATION?

We will hold your personal information on our systems for as long as is necessary for the relevant activity.

Where you contribute material to us, e.g. user generated content or in response to a particular campaign we will generally only keep your content for as long as is reasonably required for the purpose(s) for which it was submitted unless otherwise stated at the point of generation.

## JOB APPLICATIONS AND CURRENT AND FORMER EMPLOYEES

If you apply to work at Elrha, we will only use the information you give us to process your application and to monitor recruitment statistics. If we want to disclose information to someone outside Elrha- for example, if we need a reference, plan to use an external supplier to run background checks or need to get a 'disclosure' from the Disclosure and Barring Service (DBS) - we will make sure we tell you beforehand, unless we are required to disclose this information by law.

When recruiting for a post based in another country, Elrha will sometimes need to



transfer your personal information to that country to progress the recruitment. It may be that that country does not provide the same level of data protection as in the European Economic Area.

If you are unsuccessful in your job application, we will hold your personal information for **6 months** after we've finished recruiting the post you applied for. After this date we will destroy or delete your information.

If you begin employment with us, we will put together a file about your employment. We keep the information in this file secure, and will only use it for matters that apply directly to your employment.

Once you stop working for us, we will keep this file according to our record retention guidelines. You can contact us to find out more about this by emailing us info@elrha.org

#### GRANTEES AND APPLICANTS TO OUR GRANT FUNDING PROGRAMMES

If you apply for funding from one of our grant funding programmes, we will process your personal data for the purposes of assessing your application.

If you are successful in obtaining funding on one of our grant funding programmes, we will process your personal data for the purpose assessing the grant for financial and other risks (we call this our Due Diligence process). We will also hold and process your personal data for the duration of your grant, as defined in our contract with you, for the purpose of administering and monitoring the grant. Once the grant is closed, we will retain any personal information related to it to allow for audits and for programme monitoring purposes.

If you are unsuccessful in obtaining funding, we will retain personal information related to the grant application for the purposes of monitoring the grant funding programme.

#### CHILDREN'S DATA

When you register with us, you are stating that you are 18 years of age or over, or are a minor acting with parental consent. You agree that any information you provide to us about yourself upon registration or at any time is true.

#### WHAT ARE YOUR RIGHTS?

Under the Data Protection Act you have the right to request a copy of the personal information we hold about you and to have any inaccuracies corrected.

You can make a complaint or raise a concern about how we process your personal data by contacting our Data Protection Officer as above. In some circumstances, you have the right to object to our processing of your personal data or to stop us from continuing to make active use of personal data that we retain in our records.

If you are not happy with how we have handled your complaint, you can contact the Office of the Information Commissioner, which oversees the protection of



personal data in the UK, or the Fundraising Regulator, which is responsible for overseeing fundraising activities carried out by charities in the UK.

## OTHER WEBSITES

We cannot be held responsible for the privacy of data collected by websites not owned or managed by Elrha, including those linked through our website.

## EMAILS TERMS OF USE

Emails aren't always secure, and they may be intercepted or changed after they've been sent. Elrha doesn't accept liability if this happens. The contents of emails reflect their author's views and not necessarily those of Elrha's.

Please do not send <u>unsecured</u> financial data to Elrha. If you are required to send Elrha financial information via email, for example, as part of a funding agreement, <u>please ensure files are password protected, with passwords sent separately to the data.</u>

The information in emails is confidential, so if you've received one by mistake, please delete it without copying, using, or telling anyone about its contents.

## **COOKIE CONSENT**

By using our website, our social media pages (such as Twitter and LinkedIn), or subscribing to our mailing list, you agree that, unless you have set your computer's browser to reject them, we can place the types of cookies set below on your device and use that data in accordance with this policy.

In order to remember that you have accepted our use of cookies, we will place a temporary cookie to remember your consent for 3 months. For more information about how we use cookies on this site, please review our **Cookie Policy** below.

## HOW CAN YOU CONTACT US?

If you have any questions or concerns regarding our Privacy Policy or our processing of your personal information, please contact us at:

Elrha 1 St John's Lane London EC1M 4AR

Email: info@elrha.org



# **COOKIE POLICY**

## COOKIES AND HOW WE USE THEM

#### WHAT ARE COOKIES?

Cookies are text files containing small amounts of information which are downloaded to your device when you visit a website. Cookies are then sent back to the originating website on each subsequent visit, or to another website that recognises that cookie. Cookies are useful because they allow a website to recognise a user's device and to target the content displayed to the user's interests.

You can find more information about cookies at: www.allaboutcookies.org and www.youronlinechoices.eu for a video about cookies visit www.google.co.uk/goodtoknow/data-on-the-web/cookies

## DO WE USE COOKIES?

Yes.

## TYPES OF COOKIES

There are two broad types of cookies - 'first party cookies' and 'third party cookies':

First party cookies are cookies that are served directly by the website operator to your computer and are often used to recognise your computer when it revisits that site and to remember your preferences as you browse the site. Basically, these are our cookies.

Third party cookies are served by a service provider on behalf of the website operator and can be used by the service provider to recognise your computer when you visit other web sites. Third party cookies are most commonly used for web site analytics or advertising purposes.

In addition, cookies may be either 'session cookies' or 'persistent cookies'. Your computer automatically removes session cookies once you close your browser. Persistent cookies will survive on your computer until an expiry date specified in the cookie itself, is reached. We use both session and persistent cookies.

## CATEGORIES OF COOKIES WE USE

1. Strictly necessary cookies: These cookies are essential for the user to move around the website and to use its features, e.g. shopping baskets and e-billing.



- 2. Performance cookies: These cookies collect information about how the user makes use of the site, e.g. which pages the user visits most. These cookies do not collect information that identifies the user.
- 3. Functionality cookies: These cookies remember choices made by or attributes of the user and enhance the features and content you experience during your visit to our website, e.g. language, appeals visited or user's location. This cookie is also used to remember a user's preferences for a font size, or customisable parts of a web page.
- 4. Targeting or advertising cookies: These cookies collect information about the users' browsing habits. This may also include your use of social media sites, e.g. Facebook, etc. or how you interact with our website which then shows you relevant content elsewhere on the internet. NB. These may also be used to choose the advertisements that are displayed to you on our website and other websites.

We have assessed our cookies based on the <u>ICC Cookie Guide</u>. The majority of our cookies fall into the first two categories. However, we also use cookies on our webpages which are in categories 3 and 4.

## WHAT INFORMATION DO WE COLLECT USING COOKIES?

We may collect some, or all, of the information available from cookies when you visit our website, depending on how you use it. We monitor how people use our website so we can improve it. We collect this information anonymously.

However, you can choose to use our website anonymously without giving us any information. Please see 'Changing your cookie preferences' below.

- If you visit our website, we may use cookies to record information about:
- the areas of the website you visit;
- the amount of time you spend on the site;
- whether you are new to the site, or have visited it before;
- the country, region, city and/or borough associated with your IP address or device:
- how you came to our website for example, through an email link or a search engine;
- the type of device and browser you use;
- how you use the website and the quality of your experience for example we may track your bandwidth when viewing videos;
- how you interact with our donation and sign up forms for example what you select as your communication preferences; and
- any error messages that you receive on the site

We use cookies to track how visitors come to our site. For example, we use marketing or referring tracking codes in internet addresses (URLs) to show us whether a visitor has come to our site via a link on a referring website or in a specific piece of marketing and to give us insight into the effectiveness of our marketing.



Some of this information may be used by third party cookies to target you with relevant advertising (see below).

Although not through cookies, we do measure the success of the emails we send – so we know what subject lines and stories people liked the most. We receive this information anonymously, we don't share this information.

## WEBSITE STATISTICS ANALYTICS, TESTING AND PERSONALISATION

Because we are in a transition period, our website currently uses three types of web analytics services:

1. Google Analytics, a web analytics service provided by Google, Inc. ("Google"). Google Analytics uses "cookies", which (as discussed above) are text files placed on your computer, to help the website analyse how users use the site. The information generated by the cookie about your use of the website (including your IP address) will be transmitted to and stored by Google on servers in the United States. Google will use this information for the purpose of evaluating your use of the website, compiling reports on website activity for website operators and providing other services relating to website activity and internet usage.

Google may also transfer this information to third parties where required to do so by law, or where such third parties process the information on Google's behalf. Google will not associate your IP address with any other data held by Google. You may refuse the use of cookies by selecting the appropriate settings on your browser, however please note that if you do this you may not be able to use the full functionality of this website. By using this website, you consent to the processing of data about you by Google in the manner and for the purposes set out above. For more details please read <a href="Google's Analytics overview">Google's Analytics overview</a>.

You can always opt-out of Google Analytics cookies by Google's opt-out tool.

## OTHER THIRD-PARTY COOKIES

You may notice some other cookies that are not related to Elrha's website whilst visiting www.elrha.org. Some of our pages contain embedded content such as YouTube or Vimeo video and a Twitter feed, and you may receive cookies delivered from these websites. Elrha does not govern the publication of third-party cookies. To understand more about their cookies and privacy statements, please visit the relevant sites.

## CHANGING YOUR COOKIE PREFERENCES

The "Help" menu in the toolbar of most web browsers will tell you how to change your browser's cookie settings, including how to have the browser notify you when



you receive a new cookie, and how to disable cookies altogether. Below is some helpful guidance about how to make these changes.

## HOW TO DISABLE COOKIES

If you are using Microsoft Internet Explorer and you wish to block Save the Children's website cookies, you can perform the following:

- 1. On your browser tools menu, select 'Internet Options'
- 2. Click on the 'Privacy' tab and then on the 'Sites' button
- 3. Type into the 'Address of website' field: www.savethechildren.org.uk
- 5. Click on the 'Block' button
- 6. Click on the OK button

Find out more information about blocking or deleting cookies <u>using Microsoft Internet</u> <u>Explorer.</u>

- 7. Other browsers:
- Firefox cookie management
- Chrome cookie management
- Safari cookie management

Find out more detailed information on disabling cookies.

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