

## Privacy Notice

Pump Aid is committed to protecting and respecting everyone's privacy. This notice sets out the basis on which we process any personal data and lays out our practices regarding personal data and how we treat it. It also ensures that Pump Aid:

- complies with data protection law and follows good practice;
- protects the rights of staff, customers, beneficiaries, donors partners and stakeholders;
- is open about how it stores and processes individuals' data;
- protects itself from the risks of a data breach.

For the purpose of the General Data Protection Regulation (GDPR) Act, the data controller is Pump Aid, Development House, 56-64 Leonard Street, London, EC2A 4LT.

### Data protection

The General Data Protection Regulation (GDPR) gives individuals rights and protections in how their personal data is used by organisations. Pump Aid needs to hold and process personal data and therefore has responsibilities under the GDPR.

The main principles of the Act state that personal data must be:

- obtained and processed fairly and lawfully;
- held for lawful purposes only;
- adequate, relevant and not excessive;
- accurate and kept up-to-date;
- accessible by the individual who may ask for the data to be corrected;
- secured against unauthorised access, disclosure or destruction and accidental loss.

We can only process personal data under one of the following lawful purposes:

1. **Consent:** someone has given clear consent for us to process their personal data for a specific purpose, including information about Pump Aid's activities and donation details.
2. **Contract:** the processing is necessary for a contract we have with an individual, or because they have asked us to take specific steps before entering into a contract.
3. **Legal obligation:** the processing is necessary for us to comply with the law, such as accounting records for reporting and audit purposes, address and consent for Gift Aid claims or donation records for HMRC declarations..
4. **Legitimate interests:** the processing is necessary for our legitimate interests or the legitimate interests of a third party, unless there is a good reason to protect the individual's personal data which overrides those legitimate interests. Pump Aid keeps personal data for historical, statistical and research purposes so that we can understand giving patterns and can better meet our mission of eliminating poverty.

## **Information we may collect from individuals**

We may collect and process information that individuals (such as names and contact details) provide to us:

- by filling in forms on our website;
- by filling in donation forms at events or in response to campaigns;
- by responding to Facebook, twitter or other digital media activity;
- by contacting us by email, telephone or post, as we may keep a record of that correspondence;
- by uploading content through social media channels - including, but not limited to LinkedIn, Facebook, Twitter, Instagram, YouTube.

We may also collect and process information about individuals using our website including, but not limited to traffic data, location data, weblogs and other communication data, whether this is required for our own purposes or otherwise.

## **Information we may collect from other sources**

We may collect additional information from a wide range of publicly available sources, in line with our need to raise funds and celebrate our achievements or in order to conduct due diligence on an organisation or individual. If it is necessary to process sensitive personal data, we will apply appropriate safeguards, we will seek the individual's consent and we will not disclose the information to any third party.

## **IP addresses and cookies**

We may collect information about an individual's computer, including the IP address, operating system and browser type, for system administration and to aggregate information from our website. This will principally include statistical data about our users' browsing actions and patterns.

For the same reason, we may obtain information about an individual's general internet usage by using a cookie file which is stored on the hard drive of their computer. Cookies contain information that is transferred to a computer's hard drive. They help us to improve our site and to deliver a better and more personalised service by:

- estimating the size of our audience and their usage pattern;
- storing information about individual preferences, so we can customise our site according to individual interests;
- speeding up searches;
- recognising users when they return to our site.

Individuals may refuse cookies by activating the setting on their browser which allows them to refuse the setting of cookies. However, if they select this setting, they may not be able to access certain parts of our site. Unless the browser setting has been adjusted to refuse cookies, our system will issue cookies when an individual logs on to our site.

You can find out more about cookies and how to manage them at [www.aboutcookies.org](http://www.aboutcookies.org).

## **Where we store personal data**

By submitting personal data, individuals agree to this transfer, storing, or processing. We will take all steps reasonably necessary to ensure that personal data is treated securely and in accordance with this privacy notice.

All information provided to us is stored on our secure services. Any payment transaction is encrypted. Where we have given an individual (or where they have chosen) a password which enables them to access certain parts of our site, they are responsible for keeping this password confidential. We ask individuals not to share a password with anyone.

It is worth noting that the transmission of information via the internet is not completely secure. Although we will do our utmost to protect personal data, we cannot guarantee the security of the data transmitted to our site; any transmission is at the individual's own risk.

Once we have received an individual's information, we will use strict procedures and security features to try to prevent unauthorised access. However, our site could be subject to unauthorised access and, though we take steps to prevent this, we cannot guarantee that it will not occur.

## **Uses made of personal data**

- To ensure that content from our site is presented in the most effective manner;
- to provide information about fundraising and campaigns and other activities that individuals may request from us or which we believe may interest them, where they have consented to be contacted for such purposes;
- to carry out our obligations arising from any contact entered with us;
- to allow participation in interactive features of our campaigns and events or other activities, when opting in;
- to notify individuals about changes to our services;
- to send fundraising communications inviting individuals to respond to campaigns, respond to appeals or to support our activities, in accordance with the GDPR Act and with the Privacy and Electronic Communications Regulations;
- to conduct public research on an individual if they make a substantial donation or wish to sponsor a major project, for due diligence purposes and in accordance with our responsibilities to the UK charity regulator;
- to deal with enquiries and requests;
- to provide and personalise our services;
- to administer funding application and impact report records;
- to compile statistical and qualitative information about giving trends within Pump Aid's networks;
- to maintain information as a reference tool or general resource.

## **Disclosure of your information**

We may disclose information to third parties if we are under a duty to disclose or share personal data in order to comply with any legal obligation, or in order to enforce or apply our terms and other agreements or to protect the rights, property and safety of Pump Aid or others.

We may also share data with a designated data processor, for example to process payments or send communications. In this case, the processor is bound by a contract to only act on our instructions, as well as to enact security equivalent to ours in regards to GDPR requirements.

Apart from the circumstances above, we will never share your personal data with third parties without individual explicit consent to do so.

## **External links**

Our website may, from time to time, contain links to and from the websites of our partners, funders or other organisations. If an individual follows a link to any of these websites, they should note that these sites have their own privacy policies and that we do not accept any responsibility or liability for these policies.

## **Individual rights - direct marketing**

An individual has the right to prevent their personal data being processed for direct marketing. They may exercise this right at any time by communicating their wish to do so in writing (either email or hard copy) to Pump Aid.

When we receive a request, we aim to stop contacting the individual immediately; in exceptional cases, this may take up to 28 days from receiving the notice in the case of email communications, or two months in the case of post.

When exercising this right, individuals are kindly requested to include 'unsubscribe' in the subject line, as well as their name and the address/email by which they were contacted. All fundraising communications from Pump Aid will contain further details on how to do this. We will also make every effort to act on such requests made via telephone, although we do not recommend this method as it may complicate the administrative process and lead to errors.

If an individual wishes to opt out as described above, but does not have an email to reply to (e.g. they were contacted by post, but wish to opt out by email), they may do so by sending an email specifying their name and email address, with 'unsubscribe' in the subject line, to [info@pumpaid.org](mailto:info@pumpaid.org). It is possible also opt out by phone on 0845 504 6972, or by sending a letter to Pump Aid, Development House, 56-64 Leonard Street, London, EC2A 4LT.

Pump Aid may retain enough information about the individual to stop including that person in future direct marketing activities. If an individual feels their rights under the Act or other legislation have been infringed, they have the right to complain at any time to the Chief Executive of Pump Aid at the above address.

## **Individual rights - access to information**

GDPR gives individuals the right to access information held about them.

We will provide the information in response to basic requests without charge although may charge a reasonable fee when a request is manifestly unfounded or excessive, particularly if it

is repetitive or further copies of the same information are requested. The fee will be based on the administrative cost of providing the information.

Pump Aid will require proof of identity before providing details of any personal information it may hold about them. Requests should be made in writing (either email or hard copy) to Pump Aid and, within 30 days of receipt of this, we will send a summary of:

- whether any personal data is being processed;
- what personal data is held, the reasons it is being processed, and whether it will be given to any other organisations or people.

In the case of a complex request, the period of 30 days may be extended to 90 days.

They will also be sent a copy of the information comprising the personal data held, and given details of the source of the data (where available).

Individuals should submit their request via email to [info@pumpaid.org](mailto:info@pumpaid.org) with 'Subject Access Request' in the subject line. The request should also include brief details of the information of which they would like a copy to help us locate the data.

### **Retention of data**

Pump Aid keeps personal data for historical, statistical and research purposes so that we understand giving patterns and can better meet our mission of eliminating poverty. Personal data held for these purposes may be kept indefinitely as long as it is not used in connection with decisions affecting particular individuals, or in a way that is likely to cause damage or distress.

### **Removal of data**

All data removed from our systems will be done in accordance with legal guidelines, which may be subject to change from time to time.

Individuals also have a right to request data be removed but the right is not absolute and only applies in certain circumstances:

- Where the personal data is no longer necessary in relation to the purpose for which it was originally collected/processed.
- When the individual withdraws consent.
- When the individual objects to the processing and there is no overriding legitimate interest for continuing the processing.
- The personal data was unlawfully processed, in breach of the GDPR.
- The personal data has to be erased in order to comply with a legal obligation (for example, a court order).

### **Contact**

Any question, comments or requests regarding this privacy notice are welcomed and should be sent to the Chief Executive, Pump Aid, Development House, 56-64 Leonard Street, London, EC2A 4LT.