



STAHILI PRIVACY POLICY

May 2018

At Stahili, we respect your privacy and we are committed to protecting your personal data (that is, any information that can be used to identify you). This policy sets out how Stahili collects and processes your personal data. We kindly ask you to read this privacy policy together with the notices we give you when we are collecting your personal data so that you are fully aware of how and why we are using your data. We recommend that you read this policy prior to providing your information.

You are welcome to contact Stahili's Data Protection Officer at privacy@stahili.org if you have any questions or comments.

Things you need to know

We use your personal information to provide you with information about Stahili's work and issues related to children and their rights.

We never sell your personal information to third parties.

What data we collect about you

In order to stay in touch with you, for example through our newsletter, we will collect and store only contact information such as your name and email address. In other situations, for example if you are a regular donor, we will also collect and store financial data such as bank account and transaction details.

In summary, we may collect the following kinds of data:

- **Identity Data** such as your name, title, date of birth and gender;
- **Contact Data** includes billing address, home/business address, email address and telephone numbers;
- **Financial Data** includes bank account details;
- **Transaction Data** includes details about payments between us; and
- **Marketing and Communications Data** includes your preferences about receiving our informational and marketing materials.

We may use, store and transfer information within the broader Stahili organisation (which operates in Europe, Africa and North America), always in accordance with our privacy protection principles.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

How do we collect your personal data?

We might collect your data in any of the following ways:

- **Direct interactions** such as when you fill in a form (like the 'Contact Us' form on our website) or when you correspond with us by phone, email or otherwise. This includes personal data you provide when you:
 - subscribe to our publications;
 - donate to us; or
 - give us feedback.
- **Automated technologies or interactions** when you interact with our website, including information about your equipment, browsing actions and patterns. We collect this personal data by using cookies.

How we use your personal data

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- where you have asked us for information or to contact you; and
- where we need to comply with a legal or regulatory obligation.

Purposes for which we collect your data

Set out below is a description of the ways we might use your data. Please contact us if you need more details about this explanation.

Purpose/Activity	Type of data	Basis for processing
To register you as an interested person	(a) Identity (b) Contact (c) Marketing and Communications	Necessary for the administration of our organisation

<p>To manage our relationship with you which will include:</p> <p>(a) Notifying you about changes to our terms or privacy policy</p> <p>(b) Asking you to leave a review or take a survey</p>	<p>(a) Identity</p> <p>(b) Contact</p> <p>(c) Profile</p> <p>(d) Marketing and Communications</p>	<p>(a) Necessary to comply with a legal obligation</p> <p>(b) Necessary to keep our records updated</p>
<p>To administer and protect our business and its website (including system maintenance, support and reporting)</p>	<p>(a) Identity</p> <p>(b) Contact</p> <p>(c) Technical</p>	<p>(a) Necessary to run our organisation, and to prevent fraud</p> <p>(b) Necessary to comply with a legal obligation</p>

Communication

You will receive communications from us about our work and issues in children’s rights if you have requested information from us. In each case, you will be given the opportunity to opt out of receiving further communications.

You can ask us to stop sending you marketing messages at any time by following the opt-out links on any message sent to you or by contacting us at any time.

Cookies

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly.

Change of purpose

We will only use your personal data for the purposes for which we collected it.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

Data 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, agents, contractors and other third parties who have a business need to know. 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.

Data Retention

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.

Your legal rights

Under certain circumstances, you have rights under data protection laws in relation to your personal data.

Request access to your personal data	This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
Request correction of your personal data	This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.

<p>Request erasure of your personal data</p>	<p>This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.</p>
<p>Object to processing of your personal data</p>	<p>You can do this when we are relying on a legitimate interest to process your data and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms.</p> <p>You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms</p>
<p>Request restriction of processing your personal data</p>	<p>This enables you to ask us to suspend the processing of your personal data if:</p> <ul style="list-style-type: none"> (a) you want us to establish the data's accuracy; (b) our use of the data is unlawful but you do not want us to erase it; (c) you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

Request transfer of your personal data	<p>We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format.</p> <p>Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.</p>
Right to withdraw consent	<p>This right applies when we are relying on your consent to use your personal data.</p> <p>This will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.</p>

No fee usually required

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

Time limit to respond

We aim to respond to all requests within one month. Occasionally, it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

Contact

We have appointed a Data Protection Officer who is responsible for overseeing questions in relation to this privacy policy. If you have any questions about this policy, including any requests to exercise your legal rights, please contact Alicia at privacy@stahili.org.

We would, however, appreciate the chance to deal with your concerns before you make any formal complaint to your national authority.

Stahili Foundation

This policy document was last updated on 24 May 2018.