



Registered charity No. 1074935

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## General data protection regulation policy

### “How we keep your information safe”

*This policy was last updated on August 19, 2021*

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We are Friends of the Children of Orissa (FoCO), a small charity which was set up in 1992 to assist Palli Unnayan Seva Samiti (PUSS) in Orissa, who are still our main partner. In July 2012 we started a new project to support the work of the Society for Children (SOCH) who rescue runaway children from the railways.

For over twenty years we have been supporting the children at the PUSS residential school near Bhubaneswar, the capital of Orissa, they get a good education and loving care at the PUSS school, and when they leave school, they go on to further education, to formal employment and to other worthwhile occupations. We raise the funds for this through this website and like to keep our supporters updated with our news and events.

We are committed to complying with the General Data Protection Regulation and the Data Protection Act 2018. Looking after the personal information you share with us is important, and we want you to be confident that your personal data is kept safely and securely. This page will let you know exactly how we use and protect your personal information.

We have published this notice to help you understand:

- How and why FoCO collect information from you
- With whom we share your information, why and on what basis
- What your legal rights are under the new regulations.

If we make changes to this notice we will notify you by updating it on our website so check back from time to time to see if anything has changed. FoCO will be what is known as the ‘Data Controller’ of the personal data you provide to us, and we will sometimes refer to ourselves in this notice as “we” or “us”. By Data Controller, this means FoCO determines the purposes and way in which any personal data are, or will be, processed.

Should you need to contact us about this, please write to:

*Dawn Copsey, The Friends of the Children of Orissa, Rose Cottage, 19 Filgrave, Bucks. MK16 9ET or via email to [secretary.foco@gmail.com](mailto:secretary.foco@gmail.com), please use Privacy Notice as the subject line.*

## What information do we collect?

Personal information is any information that can be used to identify you. If you donate money, attend an event or join us in fundraising, we will collect and process the personal information that you've provided.

This personal information may include

- Basic personal details (your name, email address, postal address, telephone or mobile number and date of birth)
- Financial details (bank account number, UK taxpayer information for gift aid)
- Credit or debit card information
- Photos or videos if you attend a fundraising event

If you attend any of our trustee meetings, these are usually recorded to allow accurate reporting for the minutes. Recordings are not shared with anyone, ordinarily it is only the Hon. Secretary who listens to the recordings and they are deleted once the minutes have been written and approved by the committee.

## How do we use your personal information?

There are several ways that we may use your personal information, all to help us provide the most relevant and personalised information to you. The following are some of the ways we use your personal information:

- To provide you with information (such as fundraising or campaigning activities), which we feel may be of interest to you. We may also permit selected third parties to provide you with information on our behalf, but all this would only be with prior consent. For more information, please see "Sharing your information with third parties" below.
- To make our marketing campaigns more targeted and relevant to potential supporters.
- To promote our activities. Where you have given us your consent, we may use photos of you, or testimonials, for promotional activities and communications.
- If you do not want us to use your data for direct marketing purposes you can contact us using the details above.

## Our lawful basis for using your personal data

Data Protection law requires us to have a reason or justification, also known as a 'lawful basis', for using any of your personal data:

### *Consent*

This is where we've asked for your permission to use your personal data in a specific way, and you've agreed. For example, to send you information via email or SMS.

### *Contract*

We may process your personal data as part of an agreement you have with us. For example, if you fundraise for us or if you purchase something from our website.

### *Legal obligation*

We may collect or share your personal data where we are required to do so by law. For example, to fulfil a regulatory requirement or for fraud detection.

### *Vital Interests*

Where there's an immediate risk to your health we may use your personal data. For example, if we're concerned for your health or safety at one of our fundraising events.

### *Legitimate interests*

We rely on legitimate interests when we have an interest in processing your personal data, which is not outweighed by your own rights and freedoms. Whenever we use this justification, we'll always consider the impact on you as an individual. Activities relying on legitimate interests might include sending you direct marketing via post or email to raise additional funds for a specific project or to invite you to attend a fundraising event or meeting.

## Sharing your information with third parties

We want you to know that FoCO respects the information we have about you and that we take the security of your information very seriously. We will securely store all personal data about our Trustees, supporters and others with whom we may work. We do not sell or otherwise make available any personal data about our supporters to any third parties at any time for marketing or advertising purposes; we may disclose your personal information to third parties if we're legally obliged to; or in order to enforce or apply our terms of use for our website or other agreements; or to protect the rights, property or safety of FoCO, our supporters, trustees or others. This includes exchanging information with other companies and organisations for the purposes of fraud detection and prevention or with other service providers during an emergency at an event. For Trustees, this will include sharing personal details with the Charity Commission and other government organisations to fulfil our legal obligations. For visitors to India, this will include sharing information with our government approved DBS provider.

## Keeping your information up to date

To make sure we always have the most up-to-date information about how to contact you, we may also, from time to time, update your records to reflect any changes to your personal information.

This information may come directly from you, or it may come from a third party that we consider is legitimate and trustworthy and in circumstances where it is appropriate and where you will have had a clear expectation that your details would be passed on for this purpose.

## How do we store your personal information?

At FoCO we've taken all steps reasonably necessary to make sure that your data, whether in paper or electronic form, is treated securely and in accordance with this privacy policy.

We always have your best interests at heart and your personal information will not be retained by FoCO for longer than necessary in relation to the purposes for which it was originally collected, or for which it was further processed.

We're legally required to hold some personal information to fulfil statutory obligations. For example, the collection of Gift Aid or to support certain financial transactions. We may be asked to keep records for longer periods or receive statutory instruction not to delete records.

## Your Rights

Your personal data is protected by legal rights, which include your rights to object to our processing of your personal data; request that your personal data be erased or corrected; request access to your personal data.

If you're concerned about the way your personal data is handled, please contact [secretary.foco@gmail.com](mailto:secretary.foco@gmail.com)

The Information Commissioner's Office (ICO) regulates data protection and privacy matters in the UK.

You may contact the Information Commissioner's Office on *0303 123 1113*, via their website [www.ico.org.uk](http://www.ico.org.uk) or via post:

Information Commissioner's Office

Wycliffe House

Water Lane

Wilmslow

Cheshire

SK9 5AF

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