

1. Introduction

Catherine Hamlin Fistula Foundation UK's mission is to help the women suffering obstetric fistula by raising funds for Hamlin Fistula Ethiopia and other partners. Our supporters and donors are an essential part of our mission, and we are committed to donor transparency and respecting supporters' privacy and wishes.

Catherine Hamlin Fistula Foundation UK (CHFF) is committed to using your information responsibly and in accordance with our obligations under UK data protection legislation, which includes the UK GDPR.

This Privacy Policy relates to information which is obtained by CHFF and for which CHFF is the Data Controller. The processing of your personal data is carried out by or on behalf of Catherine Hamlin Fistula Foundation UK Limited. Catherine Hamlin Fistula Foundation UK Limited is a registered company in England and Wales (16326821).

The Policy outlines how we collect, handle and safeguard your personal information. It also outlines how you can access and correct your personal information or what to do if you have any questions, concerns or complaints.

2. What kinds of information do we collect?

- Personal details (e.g. your name, gender, date of birth, occupation)
- Contact details (e.g. your address, email address, phone number)
- Payment information for donations (your credit card details which are encrypted once collected or your bank account details if provided for direct debit payments)
- A history of donations, emails, letters and other interactions with CHFF
- Online activity (please see our Cookies Policy)
- Marketing and communications data (your preferences in receiving marketing from us and our third parties and your communications preferences)

We do not collect special categories of personal data about our supporters (personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic data, biometric data or data concerning health status, a person's sex life or sexual orientation).

3. How we collect information?

We collect your personal information directly from you when you phone, email or write to us or when you fill out an online form on our website or related social media platforms including when you make a donation.

We also collect information from third parties including organisations who conduct fundraising on behalf of CHFF. Third party organisations based in the UK are also bound by the UK data protection legislation.

If someone makes a donation on your behalf, and asks that you receive information about their gift, we will collect the personal information they provide to us about you.

We also collect personal information from public records, such as telephone directories.

When it is necessary to collect your personal information, including from a third party, we will take such steps as are reasonable in the circumstances to ensure that you are notified in compliance with the UK GPR.

4. Cookies, Our Website and Your Privacy?

CHFF's websites use cookies, small pieces of data stored inside a website browser, to improve performance and to enhance user experience.

When you visit CHFF's websites, cookies allow us to collect some non-identifying basic information. This includes the total number of visitors, the pages viewed, and other anonymous information. We use this information to improve our website and optimise our fundraising and marketing campaigns.

For further information, please see [CHFF'S Cookies Policy](#).

5. How do we use your personal information?

Legal basis

The law requires us to have a legal basis for collecting and using your personal data. We rely on one or more of the following legal bases:

- **Performance of a contract with you:** Where we need to perform the contract we are about to enter into or have entered into with you.
- **Legitimate interests:** We may use your personal data where it is necessary to pursue our legitimate interests. We make sure we consider and balance any potential impact on you and your rights (both positive and negative) before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law).
- **Legal obligation:** We may use your personal data where it is necessary for compliance with a legal obligation that we are subject to.
- **Consent:** We rely on consent only where we have obtained your active agreement to use your personal data for a specified purpose, for example if you subscribe to our newsletter.

Purposes for which we will use your personal data

We have set out below, in a table format, a description of all the ways we plan to use the various categories of your personal data, and which of the legal bases we rely on to do so.

Purpose/Use	Type of data	Legal basis
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To register you as a donor or fundraiser	Identity, contact and payment details	Performance of a contract with you
To process your donations and issue a receipt	Identity, contact and payment details	Performance of a contract with you
To confirm who you are when you contact us	Identity and contact	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to identify and prevent fraud)
Keep your contact details accurate and up to date. This includes your contact preferences	Identity, contact and payment details, marketing and communications preferences	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to keep our records updated and manage our relationship with you)
To manage our relationship with you which will include: (a) Notifying you about changes to our terms or privacy policy (b) Dealing with your requests, complaints and queries (c) Keeping you updated about our work (d) Informing you about new opportunities to support our work, including by email, SMS or telephone	Identity, contact, marketing and communications preferences	(a) Performance of a contract with you (b) Necessary to comply with a legal obligation (c) Necessary for our legitimate interests (to keep our records updated and manage our relationship with you)
To administer this website	Identity, contact, online activity	(a) Necessary for our legitimate interests (for running CHFF, provision of administration and IT services, network security, to prevent fraud) (b) Necessary to comply with a legal obligation
To use data analytics	Online activity	Necessary for our legitimate interests (to improve our website and measure the effectiveness of our communications and marketing; to analyse supporter

		activity to improve our communications;
To send you relevant marketing communications	(a) Identity (b) Contact (c) Technical (d) Marketing and Communications	Consent, having obtained your prior consent to receiving direct marketing communications.

Direct marketing

When we collect your personal data via our website, you will be asked to indicate your preferences for receiving direct marketing communications from CHFF via email, SMS, telephone or post.

Opting out of marketing

CHFF relies on the generosity of our supporters to fulfil our mission. We use your personal information to provide you with updates about our organisation and the work you are supporting and for future direct fundraising requests. We will always provide a simple way for you to opt out of receiving these communications.

6. To whom do we disclose your personal information?

We may disclose your personal information to third parties who assist us in supplying our goods, services and programs or who perform functions on our behalf. We may also disclose your personal information to third parties where required by law and to anyone else whom you authorise us to disclose it to. For example:

- Financial institutions to authorise your payments
- An authorised legal representative nominated by you
- Our mailing house, marketing and telemarketing services providers
- Government or other organisations if legally required to disclose

Occasionally, we may share your contact details with other charitable organisations who may contact you with information that might be of interest to you. These organisations allow us to do the same so we can reach more people with information about CHFF. If you do not wish to receive communications from other organisations please follow the instructions provided on our communications materials to opt out or you can contact us by emailing info@catherinehamlin.org.uk.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. Where third parties act as our data processors, we do not allow them to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

7. International transfers

We share your personal data within the CHFF Group. This will involve transferring your data outside the UK to Hamlin Fistula Ethiopia (Australia) (**CHFF Australia**). CHFF Australia will hold your personal data on our behalf while we establish CHFF UK.

Whenever we transfer your personal data out of the UK to countries which have laws that do not provide the same level of data protection as the UK law, we always ensure that a similar degree of protection is afforded to it. We use specific standard contractual terms approved for use in the UK which give the transferred personal data the same protection as it has in the UK, namely the International Data Transfer Agreement.

We may transfer your personal data to service providers that carry out certain functions on our behalf. This may involve transferring personal data outside the UK to countries which have laws that do not provide the same level of data protection as the UK law.

Whenever we transfer your personal data out of the UK to service providers, we ensure a similar degree of protection is afforded to it by ensuring that the following safeguards are in place:

- We will only transfer your personal data to countries that have been deemed by the UK to provide an adequate level of protection for personal data; or
- We may use specific standard contractual terms approved for use in the UK which give the transferred personal data the same protection as it has in the UK, namely the International Data Transfer Agreement.

8. How long will we keep your personal information?

We will hold your personal information on our systems for as long as is necessary for the relevant activity. If you have opted out of receiving our communications, we will continue to hold some of your personal data to ensure that no further communications are sent.

We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

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, regulatory, or other requirements.

9. Anonymity

It is possible to remain anonymous when you deal with CHFF, for example when you make a donation to us. However, if you choose not to provide us with your personal information, we may not be able to assist you fully with your query or complaint.

There may also be circumstances, where, to comply with a UK law, we can deal only with people who have identified themselves.

10. Keeping your information safe and secure

CHFF understands the importance of protecting your personal information from misuse, interference, loss and unauthorised access, modification or disclosure. Whenever we process your data we will ensure we always keep your Personal Data rights in high regard and take account of these rights.

CHFF's website is a safe platform for our supporters to visit and make online donations. All donations made online are securely processed.

We hold supporter's personal information in encrypted or password protected electronic files and hard copy files. Hard copy records are kept in secure cabinets. Our in-house IT system is secured with a firewall and anti-virus scanners. Personal information may be stored using cloud-based software and reside on secure servers that are situated outside the UK.

We take all reasonable steps to protect personal information. This includes complying with the Payment Card Industry Data Security Standard that covers security of payment card information.

Our employees, volunteers and other service providers are expected to keep your personal and payment information confidential and secure.

CHFF takes reasonable steps to ensure that when your personal information is no longer needed, it is destroyed or permanently rendered anonymous.

We will not knowingly collect personal information from anyone under the age of 18 years.

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.

11. Your legal rights

You have a number of rights under UK data protection law in relation to your personal data.

You have the right to:

- Request access to your personal data (commonly known as a "subject access request"). 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 the personal data that we hold about you. 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.
- Request erasure of your personal data in certain circumstances. 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.

- Object to processing of your personal data where we are relying on a legitimate interest (or those of a third party) as the legal basis for that particular use of your data. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your right to object.
- You also have the absolute right to object any time to the processing of your personal data for direct marketing purposes.
- Request the transfer of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. 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.
- Withdraw consent at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent.
- Request restriction of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in one of the following scenarios:
 - If you want us to establish the data's accuracy;
 - Where our use of the data is unlawful but you do not want us to erase it;
 - Where 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
 - You have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

If you wish to exercise any of the rights set out above, please contact us.

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 could 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 try to respond to all legitimate requests within one month. Occasionally it could 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.

12. Questions and Complaints

You have the right to access your data and can request this in writing or verbally. We will respond to your request within 30 days.

If you wish to make a complaint about our privacy practices, please submit a written complaint to CHFF using the contact details listed in Section 13 of this Privacy Policy. We will investigate any complaint and respond to you within 30 days.

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK regulator for data protection issues (www.ico.org.uk). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

13. Contacting us

If you want to contact us for any reason in relation to the CHFF Privacy Policy, you can contact us at:

Mail:

c/Broadfield One Bartholomew Close LONDON EC1A 7BL

Email:

info@catherinehamlin.org.uk

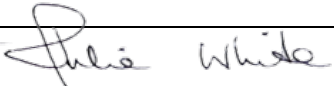
14. Updates to this Privacy Policy and your duty to inform us of changes

This Privacy Policy will be updated periodically; the current version is available at www.catherinehamlin.org.uk and is also available by post or email on request.

15. Third party links

This website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy policy of every website you visit.

Authorisation

Signature of Chairperson	
Name of Chairperson	Julie White
Board Approval Date	9 May 2019