

Privacy Notice

Who we are:

Shakiry Charity for Social Solidarity (Shakiry Charity) is a charitable non-profit organisation (Charity Reg. No. 1115625 and Company Reg. No. 5354695). Our offices are situated at Unit 1D, Crusader House, 289 Cricklewood Broadway, London NW2 6NX. Our website address is: www.shakirycharity.org

Our (abbreviated) Aims/Objects (Iraq and the United Kingdom) are:

- To promote the efficiency and effectiveness of charities and the efficient use of charitable resources;
- The prevention or relief of poverty;
- To develop the capacity and skills of socially and economically disadvantaged Iraqi communities;
- To promote social inclusion for the public benefit of communities and assisting them to integrate into society.

We are **Data Controller and Data Processor** of your personal data. We determine for what purposes personal information held will be used, and are responsible for processing such **Personal data**.

Shakiry Charity recognises the need for the correct and lawful treatment of personal data. We are committed to protecting the privacy and security of an individual's (**Data Subject's**) personal information and will ensure that appropriate measures are implemented to prevent unauthorised or unlawful processing or accidental loss or destruction of, or damage to, personal data

This Document sets out how Shakiry Charity manages the personal information of **Data Subjects** (Individuals/Service Users, Website Users, Donors, Beneficiaries, Trustees, Employees, Volunteers Consultants or other individuals) who we may come into contact with in the process of carrying out the work of the charity. Information collected will be dealt with and stored appropriately whether on paper, in a computer database, or recorded on other material according to the Data Protection Act 1998.

It is important that this notice is read, together with any other Privacy Notice(s) we may provide on any occasion so that you are aware of how and why we may collect or process personal information. By using our website or providing us with your personal information, you agree to your personal information being used and stored in the manner set out in this Privacy Notice.

1. Data Protection Law

This refers to the General Data Protection Regulation [(EU) 2016/679] (GDPR)] and any national implementing laws, regulations and secondary legislation, as amended or updated from time to time in the UK and any successor legislation to the GDPR or Data Protection Act 1998.

2. Data Protection Principles

Shakiry Charity will adhere to the Principles of Data Protection. Specifically, the Principles require that:

- a) Personal data shall be **processed lawfully, fairly** and in a transparent manner in relation to individuals;
- b) Personal data shall be **obtained only for one or more specified and lawful purposes**, and shall not be further processed in any manner incompatible with that purpose or those purposes.

- c) Personal data shall be **adequate, relevant and not excessive** in relation to the purpose or purposes for which they are processed.
- d) Personal data shall be **accurate and, where necessary, kept up to date**. Every reasonable step will be taken to ensure that personal data that is inaccurate, having regard to the purposes for which they are processed, is erased or rectified without delay;
- e) Personal data shall be **kept** in a form which permits identification of data subjects for **no longer than is necessary** for the purposes for which the personal data are processed;
- f) Personal data shall be **processed in a manner that ensures security of the personal data**, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures.”

3. Personal information we collect and the purposes for which we use it.

Donors and Beneficiaries

- a. Personal data/information you give us may be collected at events, workshops, online donation platforms, and when you use our website (Please refer to our section on Cookies).
- b. When you make a donation, or respond to articles in our newsletter or appeals, or sponsor a child, we may collect personal information in connection with the transaction.
- c. When a beneficiary registers through a Shakiry Charity Partnership, and benefits through sponsorship/a donation (financial or in-kind) or other support.
- d. When you contact us with enquiries or other correspondence, including via social media
If you interact with us in one of the ways listed above, we may collect and process personal information about you such as:
 - a. Your name, address, email address, telephone number, your age;
 - b. Information you enter onto our website or in other hard copy forms at an event;
 - c. Records of your correspondence with us, if you have contacted us;
 - d. Details of your visit to our website, including your IP address;
 - e. Financial information such as your bank or card details;
 - f. Whether you share a relationship with another individual (e.g. parent or guardian and children)

Information we receive from other sources

Your information may be given to us by third parties, for example fundraising sites like Just Giving, or payment agencies such as PayPal. They will do so pursuant to their own policies on data protection and privacy. Please check their policies when you provide your information to them to fully understand how they will process your data and may share it with others.

Why and how we use your information.

We will process your personal information in accordance with this Privacy Notice and our obligations under applicable data protection laws and regulations, for one or more of the following reasons:

- a. To administer your donation and where we need to share your personal information with people or organisations in order to run our business or comply with any legal and/or regulatory obligations eg HMRC for Gift Aid purposes. To comply with applicable laws and regulations, and requests from statutory agencies;
- b. To follow guidance and recommended best practice of government and regulatory bodies;
- c. For market research and analysis and developing statistics
- d. To provide you with the services, or information you have indicated you are happy to receive or which you have asked for;
- e. To keep a record of your relationship with us, and to manage your communication preferences with us generally;
- f. For the purposes of research such as supporter satisfaction research;
- g. For marketing purposes, to provide you with information about us, our fundraising appeals and campaigns, the opportunity to attend one of our events, and any other information on activities or services that we may provide or provide access to (e.g. supporter updates);
- h. To provide essential event information where you have signed up to attend;
- i. To notify you about changes to our service and/or donor/sponsorship opportunities;
- j. To ensure that content from our website is presented in the most effective manner for you and for your computer/mobile device.
- k. To update you on Charity news and Special Appeals;
- l. We may send you emails, SMS messages, newsletters and other electronic and paper material which we think may interest you. At any time you can decide not to receive such correspondence or opt out, and will be able to 'unsubscribe'.
- m. For direct marketing communications. We will send marketing to you by SMS, email, phone, post and social media and digital channels.
- n. Where you have provided your consent for us to publish details related to an Appeal for support;

Where the law permits us to do so, in order to improve the quality and accuracy of the information you have provided to us, we may from time to time check the accuracy of the data we already hold about you. If we obtain updated details, we would combine this with the information we currently hold about you.

We may use profiling and screening techniques to analyse your personal information and create a profile about you, your interests and preferences from publicly available information. This may include information about your personal circumstances, including details about your previous donations. We do not use third parties to carry out this analysis on our behalf. This should also improve the quality of our supporters' experience.

Trustees, Employees, Volunteers, Contractors and other individuals

We collect personal data (information):

- a. When you apply to act as a Trustee of Shakiry Charity
- b. When you apply for a job with us or one of our Partners, or provide services via an agency or provide consultancy services direct to us.
- c. You contact us in relation to volunteering for us.
- d. Sometimes additional information may be collected from third parties, such as from former employers or other background and check agencies. During the period that you are with us, we may collect additional personal information in the course of job-related activities

We will use personal information only for the purposes for which it was originally collected and we will make sure we delete it securely.

We will only use your personal information when the Law allows us to, specifically:

The kind of information we hold about you:

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data). We will collect, store, and use the following categories of personal information about you:

- Personal contact details such as name, title, addresses, telephone numbers, and personal email addresses.
- Date of birth.
- Gender.
- Marital status and dependants.
- Next of kin and emergency contact information.
- National Insurance number.
- Bank account details, payroll records and tax status information.
- Salary, annual leave, pension and benefits information.
- Start date.
- Recruitment information (including copies of right to work documentation, references and other information included in a CV or cover letter or as part of the application process).
- Employment records (including job titles, work history, working hours, training records and professional memberships).
- Compensation history.
- Performance information.
- Disciplinary and grievance information.

Situations in which we will use your personal information:

- Making a decision about your recruitment or appointment.
- Determining the terms on which you work for us.
- Checking you are permitted to work in the UK.

- Paying you and, if you are an employee, deducting tax and National Insurance contributions.
- Providing employment benefits to you.
- Administering the employment contract, we have entered into with you.
- Business management and planning, including accounting and auditing.
- Conducting performance reviews, managing performance and determining performance requirements.
- Making decisions about salary reviews and compensation.
- Assessing qualifications for a particular job or task, including decisions about promotions.
- Gathering evidence for possible grievance or disciplinary hearings.
- Making decisions about your continued employment or engagement.
- Making arrangements for the termination of our working relationship.
- Education, training and development requirements.
- Dealing with legal disputes involving you, or other employees, workers and contractors, including accidents at work.
- Ascertaining your fitness to work.
- Managing sickness absence.
- Complying with health and safety obligations.
- To prevent fraud.
- To monitor your use of our information and communication systems to ensure compliance with our IT policies.
- To ensure network and information security, including preventing unauthorised access to our computer and electronic communications systems and preventing malicious software distribution.
- Equal opportunities monitoring.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- Where we need to protect your interests (or someone else).
- Where it is needed in the public interest.

Failure to provide certain information when requested, may result in our inability to perform the contract we have entered into with you (such as paying you or providing a benefit), or we may be prevented from complying with our legal obligations (such as to ensure the health and safety of our employees, workers and contractors).

Do we need your consent?

We do not need your consent if we use special categories of your personal information in accordance with our written policy to carry out our legal obligations or exercise specific rights in the field of employment law. In limited circumstances, we may approach you for your written consent to allow us to process certain particularly sensitive data. If we do so, we will provide you with full details of the information that we would like and the reason we need it, so that you can carefully consider whether you wish to consent. You should be aware that it is not a condition of your contract with us that you agree to any request for consent from us.

Information about criminal convictions

We may only use information relating to criminal convictions where the law allows us to do so. This will usually be where such processing is necessary to carry out our obligations and provided we do so in line with our Data Protection Policy.

Less commonly, we may use information relating to criminal convictions where it is necessary in relation to legal claims, where it is necessary to protect your interests (or someone else's interests) and you are not capable of giving your consent, or where you have already made the information public.

We do not envisage that we will hold information about criminal convictions; however, we will notify you if this position changes.

4. Basis on which we use your personal information

Whilst generally we will seek consent to process your data at the point we collect it, in some cases we may process data without consent where we are legally allowed to do so, and where we have legitimate reasons for doing so (e.g. to process a donation you have made or in accordance with this policy), provided we respect your legal rights.

Legitimate Interest provides for Data Subject processing when such processing is necessary for the purposes of the legitimate interests pursued by the Controller or by a Third Party, except where such interests are overridden by the interests or fundamental rights and freedoms of the Data Subject which require protection of personal data, in particular where the data subject is a child.”

If you request to receive no further contact from us, we will keep some basic information in order to avoid sending you unwanted materials in the future, and to ensure that we do not accidentally store details for the same person multiple times. If we did not retain this information then this could result in us contacting you again as we would no longer have a record of your request not to be contacted.

We will keep your personal data for no longer than is necessary for the purposes for which it is processed, in accordance with our internal policies.

5. Change of purpose

We will only use your personal information for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If we need to use your personal information 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 information without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

6. How we use particularly sensitive personal information

We need to have justification for collecting, storing and using this type of personal information. We may process special categories of personal information in the following circumstances:

1. In limited circumstances, with your explicit written consent.
2. Where we need to carry out our legal obligations or exercise rights in connection with employment.
3. Where it is needed in the public interest, such as for equal opportunities monitoring.
4. Less commonly, we may process this type of information where it is needed in relation to legal claims or where it is needed to protect your interests (or someone else's interests) and you are not capable of giving your consent, or where you have already made the information public.

5. As an employer, we may use your particularly sensitive personal information in the following ways:
- relating to leaves of absence (sickness absence or family related absence to comply with employment and other laws).
 - information about your physical or mental health, or disability status, to ensure your health and safety in the workplace and to assess your fitness to work, to provide appropriate workplace adjustments, to monitor and manage sickness absence and to administer benefits.

7. Automated decision-making

Automated decision-making takes place when an electronic system uses personal information to make a decision without human intervention.

We do not envisage that any decisions will be taken about you using automated means, however we will notify you in writing if this position changes.

8. Data sharing

We may have to share your data with third parties, including third-party service providers and other entities in our group (Partners).

"Third Parties" also includes third-party service providers (including contractors and designated agents). We only permit "Third Parties" to process your personal data for specified purposes in accordance with our instructions, where required by law, and where we have a legitimate interest in doing so.

The information we collect from you may be transferred to and stored at a destination outside the European Economic Area (EEA). It may be processed by persons operating outside of the EEA. If we send your personal data outside the EEA, we will take reasonable steps to ensure your personal data is treated securely and in accordance with UK privacy laws, these steps may include ensuring the parties receiving your data are certified under an approved certification mechanism such as the Privacy Shield framework (details of which can be found at www.privacyshield.gov) or entering into data processing agreements with the parties. By submitting your details, you agree to this use of your data.

Online payment transactions will be encrypted. Where we have given you (or where you have chosen) a password which enables you to access certain parts of our site, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.

We are aware that the transmission of information via the internet is not completely secure. We will do our best to protect your personal data. We cannot however guarantee the security of your data transmitted to our site; any transmission is at your own risk. We will however use strict procedures and security measures to try to prevent unauthorised access.

Our staff, consultants, volunteers and/or external providers acting on our behalf may need to access and use your information for the purposes for which you have provided it to us (e.g. to deliver mailings, for research, to analyse data and to process payments) or for purposes set out in this privacy notice. We only provide them with the information they need to deliver the relevant service or it is relevant to their work, and we make sure your information is transferred securely and treated securely.

We do not sell your data to third parties for the purposes of marketing.

We are committed to protect vulnerable children from all forms of exploitation and abuse. Therefore, we may share details, including personal data, relating to serious breaches with statutory authorities such as the police, the National Crime Agency (NCA), the Child Exploitation and Online Protection Agency (CEOP) and the Charity Commission.

9. Partners

We may need to disclose your information to our Partners in Iraq (Al-Shakiry for Social Solidarity, and our associated Citizen Care and Advice Branches) in some circumstances, with your consent. i.e if you sponsor a child through Shakiry Charity, or support an Appeal that involves a personal link with our programmes in Iraq where certain elements of your personal data are necessary to fulfil the activity (e.g. your name and address). In this instance, we will only share your details with our Partners in accordance with data protection laws and regulations and where we have your consent to do so.

10 Your Rights under data protection laws?

Data Subjects hold Rights as to how Shakiry Charity process and manage their personal data. This may include:

- The **Right to be Informed** about the processing of your personal information
- The **Right to have your personal information corrected** if it is inaccurate and to have incomplete personal information completed
- The **Right to object** to processing of your personal information, in particular to data processed for direct marketing purposes, and to data processed in accordance with our legitimate interest .
- The **Right to restrict processing** of your personal information
- The **Right to have your personal information erased** (the “right to be forgotten”) Personal information may be deleted or removed where there is no good reason for Shakiry Charity to continue processing it.
- The **Right to request access** to your personal information and to obtain information about how we process it (commonly known as a "Data Subject Access Request"). This enables individuals to request a copy of the personal information Shakiry Charity holds, to check that we are lawfully processing it, and correct any incomplete or inaccurate information we may hold about you.
- The **Right to move**, copy or transfer your personal information (“data portability”)
- **Rights in relation to automated decision making** which has a legal effect or otherwise significantly affects you.
- **Right to withdraw**. Under specific circumstances where you may have provided your consent to the collection, processing and transfer of your personal information for a specific purpose, you have the right to withdraw your consent for that specific processing at any time.
- You have the **Right to complain** to the Information Commissioner’s Office which enforces data protection laws: <https://ico.org.uk/>.

11. Marketing Preferences

We may use your home address, phone numbers, email address and social media or digital channels (for example, Facebook, Google and message facilities in other platforms) to contact you according to your marketing preferences. You can stop our marketing at any time by contacting us and informing us accordingly.

12. Data retention

Personal information will be retained for as long as necessary in order to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

In some circumstances we may anonymise your personal information so that it can no longer be associated with you, in which case we may use such information without further notice to you. Data will be retained under our Data Retention Policy.

13. Children

Children aged 13 or over are able provide their consent for their personal information to be made available. Consent must be obtained from whoever holds guardianship for children under this age.

Children have the same rights as adults over their personal data. (Point 10 above refers: What are your rights under data protection laws?)

An individual's right to erasure is particularly relevant if consent to processing was given when they were a child (under 13).

We rely upon legitimate interests as our lawful for processing information on children. We take into consideration legitimate interests when processing the personal data of children against the interests and fundamental rights and freedoms of the child. This involves a judgement as to the nature and purpose of the processing and the potential risks it poses to children. It also ensures that appropriate measures to safeguard against risks are in place.

14. Logging in using social networking credentials

If you log-in to our sites using a Facebook log-in, you are granting permission to Facebook to share your user details with us. This will include your name, email address, date of birth and location which will then be used to form a Donor identity. This will also allow us and Facebook to share your networks, user ID and any other information you choose to share according to your Facebook account settings.

If you log-in to our sites using a Google log-in, you grant permission to Google to share your user details with us. This will include your name, email address, date of birth, sex and location which we will then use to form a Donor identity. This also allows us to share your networks, user ID and any other information you choose to share according to your Google account settings.

If you remove Shakiry Charity from your Facebook or Google settings, we will no longer have access to this information.

If you log-in to our sites using a twitter log-in, we receive your avatar (the small picture that appears next to your tweets) and twitter username.

We will not share your personal information with others for marketing purposes unless you have given us your permission to do so. If we have your permission, we will share your information only with other organisations we have chosen carefully.

If you are a Shakiry Charity Donor and attend an event organised by an event partner, data may be shared for event administration purposes.

We may make other organisations' services available, through our sites, although we are not necessarily operating these sites. Information these other organisations collect is governed by their own privacy policies.

Any other organisations who might access your information in the course of providing services on our behalf will be governed by strict contractual restrictions to make sure that they protect your information and keep to data-protection and privacy laws which apply. We may also independently audit these service providers to make sure that they meet our standards. We may use service providers to help us run these sites (or services available on the sites), some of whom may be based outside the EEA.

15. Cookies

We use cookies for a number of reasons.

1. For statistical purposes to track how many users we have and how often they visit our websites, we use Google Analytics. We may collect information listing which of our pages are most frequently visited, and by which types of users and from which countries.
2. We may use 'Flash' cookies to store your preferences for your media player (for example, volume and so on). If we don't use them, you may not be able to watch some video content.
5. You can turn cookies off but if you do this, you may not be able to use all services on our websites.

For more information about cookies and managing those, including how to turn them off, please consult your browser's help page.

By using the sites you are agreeing to the use of cookies as described.

16. Other Advertising

Our website may/may not contain links to other websites from which we may/may not earn revenue. Our donation and sponsorship appeals are never influenced by advertisers or affiliates, nor are they written for the purpose of promoting a product.

We offer a 'My details' page (also known as Email Preferences page), where you can update your personal information at any time, and change your marketing preferences. You can get to this page from most pages on the site – simply click on the 'My details' link at the top of the screen when you are signed in.

17. Complaints

Shakiry Charity takes the matter of your privacy very seriously. At all times, we will endeavour to follow the highest standards when collecting and processing your data. If you are concerned or have doubts concerning the way we process your personal data, then we encourage you to raise your concerns directly with Shakiry Charity

Manager. In the event that you remain dissatisfied and wish to lodge an official complaint, this may be done directly with the offices of the Information Commissioners Office (ICO).

18. Changes to this Privacy Notice

We may change this Privacy Notice from time to time by updating this page in order to reflect changes in the law and/or our privacy practices. We encourage you to check this privacy