# **Play Action International Privacy Notice**

October 2022

### **Background**

Play Action International (charity number 1172875) is a UK registered charity. Our fundraising activities are carried out the UK with our charitable activities taking place in Uganda. Throughout this Policy we refer to ourselves as "PAI" "we" or "us".

This Privacy Policy applies to the personal information of our staff, trustees, existing and prospective donors, fundraisers, volunteers, corporate and trust supporters and university and Students Union partners. It explains why we collect personal information, how we will use it and who we will share it with. For the purposes of data protection law, Play Action International is the "data controller" in respect of the personal information covered by this Policy.

Play Action International respects your privacy and takes our obligations under data protection law seriously. We hope that this Policy will provide you with the information you require. However, if you have further questions about the way we use your personal information please contact us using the details below:

- By post: Murielle Maupoint, Play Action International, Challenge House, Sherwood Drive, Bletchley, Milton Keynes, Buckinghamshire, MK3 6DP
- By email: murielle@playactioninternational.org

### What data do we collect?

When you get in touch with us to join our volunteering projects, fundraise, make a donation, request information or otherwise support PAI's work we will collect information about you. The information we collect may include your name, title, email address, home or work address, date of birth, telephone number(s), and if you represent a prospective organisational supporter, information on your organisation's activities or areas of interest. In some instances (such as joining our volunteering projects) additional information may be required to support your specific activities, including health information, passport details and next of kin details.

### Why do we collect your data?

PAI collects and processes personal information in order to carry out and support fundraising activities and events, and to deliver our volunteering projects. This means that we may use the personal information we collect for the following purposes:

- To manage and deliver our international volunteering projects in East Africa, including contacting you with event administration information, fundraising support and other tailored communications, and organising logistics in-country.
- Sending communications about our work, its impact on the children and communities
  we seek to help and how to support us. For example, we may send you emails or
  postal communications about our fundraising activities, how you can get involved or
  how to donate.

- Maintaining past/current donor lists for historical records, relationship management and to determine who we may ask to support us in the future.
- Maintaining accurate list of individuals that do/do not wish to receive further contact from us.
- To identify potential networks and connections to inform financial 'asks' and develop individual stewardship strategies.
- To create a prospect management list and approach potential new donors.
- To manage our internal administration, including complying with our accounting, legal and regulatory obligations as a charity.
- The maintenance of an accurate donation log to enable the development of annual accounts.
- The maintenance of up-to-date Gift Aid declarations and delivery of ensuing claims

In order to ensure the information held is up-to-date and accurate, we may use publicly available sources to verify internal records.

### DATA COLLECTION POINTS

Personal information may be collected by us in the following ways:

- When you sign up to join one of our international volunteering projects via our official website
- When you express interest in joining on of our international volunteering projects, by giving us your contact details or contacting us directly for more information
- When you contact us about our other activities, whether through our website or by email, phone, text or via social media.
- When you make a donation to us via our website, including donations to us through fundraiser's individual fundraising pages on our website
- When you donate or set up a fundraising page to benefit PAI on other online giving platforms (Just Giving / Virgin Money Giving).
- When you sign up to join a UK event via our website
- When you donate to us through any other means or fundraise on our behalf.

We do not buy data from external or third-party sources. However, we may obtain information about you from other sources. This includes where a business contact, friend or family member contacts us on your behalf because they think you would be interested in supporting our work.

We may also collect and combine your information with publicly available information so that we can tailor the communications we send you and to make sure they are relevant to you. We also use this information to ensure we contact people who are more likely to be interested in supporting our fundraising activities and donating to us.

When you visit our website, we use cookies to facilitate and improve your experience of our website. For a list of the cookies used, see Appendix 1. You can choose to delete cookies on your computer or device at any time. However, you may lose any info that enables you to access our site more quickly and effectively, including but limited to, log in and personalisation settings.

#### **LEGAL BASIS**

Data protection law requires us to have a legal basis for using your personal information. The legal basis will, in almost all circumstances, be one of the following:

- You have provided your consent.
- It is necessary to fulfil a contract that we have in place with you.
- It is necessary so that we can comply with a legal or regulatory obligation we are subject to.
- It is in Play Action International' legitimate interests to contact you so that we can pursue and fulfil our charitable aims.
- It is necessary for administration of an event that you, or your next of kin is taking part in.

### PROVIDING CONSENT TO MARKETING

PAI will only send you direct marketing communications by email or text if you have given unambiguous and explicit 'Opt-in' consent for us to do so (unless you fall into the 'corporate subscriber' category[1] and it is in our legitimate interests to contact you).

You will be provided with the option to 'unsubscribe' from all our direct marketing communications. You can also withdraw your consent by contacting:

• Murielle Maupoint (CEO), murielle@playactioninternational.org

## RETAINING PERSONAL INFORMATION

We take steps to ensure that your personal information is only retained for only as long as it is necessary for the purpose it was collected. After this period, it will be deleted or in some cases anonymised. If we collected the personal information based on your consent and we have no other legal basis to continue using your information, if you subsequently withdraw your consent, then we will delete your personal and contact information, although we may keep your name on file to ensure you are not re-added to our database in error.

### THIRD PARTIES

Play Action International works with various third-party suppliers and providers to support with the delivery of our activities, including online giving platforms such as Just Giving and Virgin Money Giving, payment processing companies GoCardless and Stripe, and our website provider Raising IT. We will receive your personal information from these third-parties where you have agreed that the information can be shared with us. In these instances, you are advised to consult other sites' privacy notices as we have no control over information that is submitted to, or collected by, these third parties.

In some situations, we may need to share your personal information with other third parties. If we do share your data, we will ensure we have the agreement of organisations or individuals beforehand to follow our data protection requirements and this privacy notice. These situations may include:

• If you are taking part in our international volunteering projects, we will share your data with your University or Students Union and with the individual acting as the project leader at your University or Students Union.

- To obtain legal or financial advice from our professional advisors.
- To enforce an agreement we have with you or investigate a suspected breach of that agreement.
- To protect the rights, property or safety of ourselves or others.
- Where we are under a legal or regulatory obligation to disclose your information. For example, where have received a valid request from the police or Charities Commission.
- In other circumstances where you have otherwise provided your consent.

### TRANSFERS OUTSIDE THE UK AND EU

During the delivery of our international volunteering projects in Uganda, we work with incountry activity providers to provide extension trips and weekend activities for our participants. As we are restricted in transferring data outside the EU, we will not share your data with these third parties. If you choose to share your data with these providers when taking part in a trip or activity, please be aware that we have no control over information that is submitted to, or collected by, these third parties. In these instances, you are advised to consult their own privacy notices.

### **YOUR RIGHTS**

Data protection law gives you certain rights in relation to your personal information. These include: (in certain circumstances) the right to object to and / or withdraw consent to the processing of your personal information, the right to access to your personal information, and the ability to erase, restrict or receive a machine-readable copy of your personal information.

We will handle any request to exercise your rights in accordance with applicable law. This means there may be certain situations in which we are not legally required to comply with your request. If you wish to exercise any of these rights please refer to the "Contact Us" section of this privacy policy.

### CHANGES TO OUR PRIVACY POLICY

We may change this Privacy Policy from time to time (for example, if the law changes). Any changes will be immediately posted on our website and you will be deemed to have accepted the terms of the Privacy Policy on your first use of our website following the alterations. We recommend that you check this page regularly to keep up-to-date.

### **CONTACT US**

Questions and comments regarding this policy should be sent to:

• Murielle Maupoint (CEO), murielle@playactioninternational.org

If you have a complaint or concern about how we have handled your personal information, please contact us in the first instance. We will work hard to resolve your concerns, however, if you are still not satisfied you can lodge a complaint with the Information Commission's Office (the data protection regulator in the UK).