

Privacy Notice

Safina Projects CIC

Last updated: 5 July 2018

Safina Projects respects your privacy. This notice explains the ways we collect and use your information, and how you can access and control data we have collected.

If you have any comments or questions about this notice, please contact our Programme Manager, Hannah Lewis, who is responsible for data protection within our organisation: hannah@safinaprojects.org

1. Personal data that we process

The following table explains the types of data we collect and the legal basis, under current data protection legislation, on which this data is processed.

Purpose	Data (key elements)	Basis
Enquiring about our organisation and its work	Name, email address, message.	Legitimate interest - it is necessary for us to read and store your message so that we can respond in the way that you would expect.
Subscribing to email updates about our work	Name, email address.	Consent - you have given your active consent.
Making a donation towards our work, or buying a product via our website	Name, email address. If payment is made via Paypal we will also received the contact information you have given to Paypal.	Legitimate interest - this information is necessary for us to fulfill your intention of making payment and your expectation of receiving a confirmation message.
Website functionality	Website activity collected through cookies (small pieces of data stored on a site visitor's browser, usually used to keep track of their movements and actions on a site).	<p>Legitimate interest - it is necessary for us to store a small amount of information, collected through cookies, to deliver functionality that you would expect, such as remembering the contents of forms while you are in the process of completing them, and keeping your data secure.</p> <p>Note on how this works: Our website is hosted on the Wix.com platform. Your data may be stored through Wix.com's databases and applications. They store your data on secure servers behind a firewall. Information about the types of cookies Wix uses is available here: https://support.wix.com/en/article/cookies-and-your-wix-site</p>

		<p>You can set your browser to refuse all or some cookies, or to alert you when websites use cookies.</p> <p>All direct payment gateways offered by Wix.com and used by our company adhere to the standards set by the worldwide Payment Card Industry Data Security Standard (PCI-DSS) as managed by the PCI Security Standards Council, which is a joint effort of brands like Visa, MasterCard, American Express and Discover. PCI-DSS requirements help ensure the secure handling of payment card information.</p>
Managing our relationship with you, including notifying you about changes to our terms, policies, or privacy notices	Name, email address	Legitimate interest - it is necessary for us to use your personal information for these purposes in order to comply with our legal obligations. These messages will not include any promotional content and do not require prior consent.
Using data analytics to monitor and improve our website by understanding how and in what circumstances it is accessed and used.	Technical and usage data (anonymised)	<p>Legitimate interest - this helps us understand how our website is being used and make it more useful and relevant to our communities of interest.</p> <p>Note on how this works: when someone visits our website, we use a third party service, Google Analytics, to collect internet log information and details of visitor behaviour patterns. We do this to find out things such as the number of visitors to each part of the site in a given time period, and the locations of visitors if known. This information is only processed in a way which does not identify anyone. We do not make, and do not allow Google to make, any attempt to find out the identities of those visiting our website.</p>

2. How we use your data

We will only use your data in a manner that is appropriate considering the basis on which that data was collected, as set out in the table above.

For example, we may use your personal information to:

- reply to enquiries you send us;
- handle donations or other transactions that you initiate;
- where you have specifically agreed to this, send you email updates about our work which we think may be of interest to you.

3. When we share your data

We will only pass your data to third parties in the following circumstances:

- you have provided your explicit consent for us to pass data to a named third party;
- we are using a third party purely for the purposes of processing data on our behalf and we have in place a data processing agreement with that third party that fulfils our legal obligations in relation to the use of third party data processors; or
- we are required by law to share your data.

In addition, we will only pass data to third parties outside of the EU where appropriate safeguards are in place as defined by Article 46 of the General Data Protection Regulation.

4. How long we keep your data

We will ensure that we only collect the minimum amount of data necessary for the associated purpose, and that we delete that data promptly once it is no longer required.

Where data is collected on the basis of consent, we will seek renewal of consent at least every three years.

5. Rights you have over your data

You have a range of rights over your data, which include the following:

- Where data processing is based on consent, you have a right to withdraw this consent at any time and we will make it as easy as possible for you to do this (for example by putting 'unsubscribe' links at the bottom of all our emails).
- You have the right to access the data we have collected about you.
- You have the right to ask for correction and/or deletion of your data.
- You have the right to lodge a complaint with the Information Commissioner if you feel your rights have been infringed.

A full summary of your legal rights over your data can be found on the Information Commissioner's website here: <https://ico.org.uk/your-data-matters/>

If you would like to access, correct or delete your data, or to exercise any other legal rights you have over your data under current legislation, please contact our Programme Manager, Hannah Lewis, who is responsible for data protection within our organisation: hannah@safinaprojects.org

6. Modifications

We may modify this Privacy Notice from time to time and will publish the most current version on our website. Changes and clarifications will take effect immediately upon their posting on the website. If an update meaningfully affects the rights of people whose personal data we hold, we will notify them by email that the modification has been made.