



# Kisumu Children Trust

## PRIVACY POLICY

FINAL VERSION

**This privacy policy has been updated to reflect new regulations and to explain how we collect, store and use supporters data securely. KCT has always sought to follow best practice and treat each supporter respectfully, in keeping with our beliefs, values and according to expressed preferences.**

### ***A) Our Privacy Pledge***

- We store supporter personal data securely
- We ensure supporter data security when dealing with banks and the postal service
- We won't share supporter details with anyone else
- We won't call supporters asking for donations
- Supporter preferences can be changed or opted out from communications at any time
- Any questions, comments or desire to change supporter mailing or contact preferences should be done by contacting [office@kisumuchildren.org.uk](mailto:office@kisumuchildren.org.uk)

Kisumu Children Trust (KCT) is a UK based charity serving the needs of the children looked after by Kisumu Children Ministries (KCM), Kisumu, Kenya. We are a charity registered in England and Wales (1091477). Our correspondence address is: Kisumu Children Trust, 1, Thorpe Avenue, Tonbridge, Kent TN10 4PW.

For the purposes of this Policy:

- 1) "KCT," "us," "we" and "our" refer to the Kisumu Children Trust.
- 2) "CBCH" means the Cherry Brierley Children's Home in Kisumu, Kenya
- 3) "KCM" means Kisumu Children Ministries, Kenya the charity through which KCT works in Kenya

### ***B) How we collect personal information from you***

Personal information is collected directly from you when you interact with KCT. For example,

- Making a donation
- Sponsoring a child or project
- Purchasing a gift
- Sending or receiving an email
- Making an enquiry
- Visiting our website
- Applying for a role at KCT
- Taking part in an event
- Volunteering for KCT
- Signing up to a campaign or newsletter
- Where we have a face to face relationship with you

Information may be collected in person, over the phone, through our websites, social media, email or from something you've posted to us.

### ***C) What information we collect about you***

The information we hold will typically include some or all of the following:

- Supporter's name
- Postal address
- Email address
- Phone number
- Supporter year or date of birth, to ensure we send you age appropriate materials
- The activity that you have completed or the information you have requested

If you make a donation, we may collect:

- Bank details
- Credit card details
- Gift Aid Declaration details

If you interact with us online, we collect:

- Non-personal data such as IP addresses
- Details of pages visited
- Details of files downloaded

Website usage information is collected using cookies: see the section on Cookies below.

We collect information from third parties such as event organisers (for example, a marathon event) or fundraising sites like BT MyDonate, when supporters have agreed to support KCT and have given their consent. Supporters may wish to check the privacy policy of such organisations to find out more information on how they will process supporter data.

We may collect information from Companies House, the Charity Commission, and information published in articles, newspapers or social media.

Where supporters provide the information, we may collect personal data such as:

- Supporter denomination or church
- Supporter religious beliefs

For employees and supporters travelling with KCT, we may store and share with a travel organiser or company supporter medical details, and if supporters participate in an event that we have organised, we may ask you to provide information to make sure we can manage the event safely and efficiently. We may also ask you for details of any accessibility needs you may have, so that we ensure our event is inclusive, in line with the provisions of the Equality Act 2010.

We may also receive information about you from other sources (including public sources). This is explained in the "How we might use supporter information" section below.

### ***D) How we might use supporter information***

We may use the personal data we collect to:

- Keep supporters up-to-date on news and the impact of KCT's work
- Ask for financial and non-financial support, such as volunteering or prayer
- Process donations supporters give us, or to support fundraising for us, including Gift Aid
- Provide information or resources, such as church packs, supporters have requested
- Provide a personalised service, such as customised website content or personalised emails

- Keep records of supporter relationship with us, for example, feedback given or complaints made
- Classify supporters by location, for example, Scotland, N Ireland or Wales
- Conduct market research to aid our understanding of supporters and their views, so we can provide a better service

## ***E) Fundraising***

### *Tailoring our communications*

We have a duty to make sure that we're spending supporter donations wisely, and that means doing some research and analysis to ensure we send you the most appropriate communications, including acknowledging past support and actions, demonstrating accountability and impact. In order to work out whom to contact, what to say and when to get in touch, we carry out the following activities:

- We look at information such as postcodes of supporters
- We look at whether donations have been given regularly

This helps us to tailor appropriate communications to supporters, to demonstrate the impact of support, as well as improve supporter experience. We may use supporter information to invite supporters to become involved with us in new ways or raise funds.

### *Personalising our interactions with you and responding to information about you*

Major gifts require a higher level of accountability both in presenting funding proposals and in demonstrating impact. We may undertake in-house research and may engage other organisations to help us identify organisations and individuals who wish to support our work, using information donors have given us and publicly available records. We may also collect information on donors' interests, for example, board memberships, hobbies, or articles in newspapers or magazines. We use this information to tailor our communications and to invite potential supporters to meetings, groups and events which may be of interest to them.

### *Social media*

Supporter settings or the privacy policies for social media and messaging services might give permission to access information from these sources. If we do access this data, for example, to assess the effectiveness of our communications, we will not add this to supporter personal details that we hold. We advise supporters to check the privacy settings on social media providers to ensure supporters are happy with the level of privacy they have chosen.

## ***F) Basis of processing supporter data***

### *Consent*

If you are a new supporter, on or after 25<sup>th</sup> May 2018, we will process supporter personal data on the basis of the consent they provide. Supporters are free to change their contact preferences at any time by contacting us by telephone, post or email, as shown in the section "Supporter choices and telling us when things change" below.

### *Contract Performance*

This means we will send supporters whatever they have requested, for example, a resource they have ordered, or write a letter to acknowledge a gift. This doesn't affect supporter other communications preferences.

### *Legitimate Interest*

- If you are an existing supporter, as at 25<sup>th</sup> May 2018, and have requested emails, we will continue to send emails to you. GDPR calls this legitimate interest.
- We may also contact supporters by post or telephone where we have a legitimate interest to do so, for example, to follow up a request which has been made. We will never call to seek a donation. For example, where a supporter has previously made a donation to KCT, we may continue to send information about the work that donation is making possible or other ways to get involved.
- Where supporters have previously asked us not to contact them in this way, we will continue to respect those contact preferences.
- Supporters can amend their preferences at any time by contacting us via telephone, post or email as shown in the section “Supporter choices and telling us when things change” below.
- When a supporter makes a donation or a series of donations, expresses an interest in our work, or shows a potential to give to our work, we will rely on our legitimate interest in order to collect additional information as noted in the Fundraising section above. This helps us to identify those supporters who would benefit from an initial discussion with a KCT Trustee or staff member, and to ensure we demonstrate appropriate levels of accountability for how we use donors’ funds.
- We may also share details of the difference our work makes and update supporters on other ways they could support our work, for example letter writing, using new resources or raising funds.

### ***G) Applying for a job or volunteering with us***

If you apply for a job with us, and you provide personal and sensitive personal data such as the information on supporter CV or Application Form, we will process and store the personal data we collect to:

- Support the recruitment and selection process
- Answer any questions you may have
- Use third parties to provide services such as references, qualifications, verification of information you have provided, health screening and psychometric evaluation or skills tests
- Undertake checks on criminal convictions
- Provide anonymised data to monitor compliance with equal opportunities policy

If you work for KCT via an agency that KCT has a contract with, we commit to ensure that the agency is also compliant with GDPR regulations.

If you submit supporter personal information to a job board, online recruitment tool, social media platform, headhunting agency etc. supporter details could then be passed to KCT. We recommend that you ensure you have given supporter consent to that organisation who may share supporter data. If we receive supporter details via a third party and are unclear about consent, we may either check with you before using supporter data further or fully delete the information.

If you do not join us as an employee or volunteer for any reason, supporter data will be stored for a proportionate length of time in line to ensure compliance with best practice, fairness and legislation.

If you volunteer or travel on a trip with us, and provide personal or sensitive personal data, such as dietary, mobility requirements or specific health information, we will store, process and disclose the personal information we collect to:

- Deliver a safe trip or event for you and others involved, including the disclosure of sensitive data, such as medical information, to our partner(s) where necessary
- Provide the administration of these events or opportunities to serve

- Monitor the quality of the volunteering opportunity or trip provided
- Answer any questions or feedback you may have
- Provide anonymised data to monitor compliance with our equal opportunities policy.

### *Legal basis of processing personal supporter data*

If a supporter provides personal and sensitive data when applying for a job or to volunteer with us, we will process that data based on the consent given by them at the point that the data is collected, or if existing information, based on legitimate interest.

### ***H) How and where we store supporter information***

We will keep supporter personal information only for as long as we consider it necessary to carry out each activity.

We have a Data Protection Policy to implement this. We take account of legal obligations and accounting and tax considerations as well as considering what would be reasonable for the activity concerned. For example, we will retain details of donations to meet tax and accounting requirements, but we will only hold sensitive medical or personal information provided to participate in an overseas trip until the trip is completed.

Legacies are an important way that many supporters choose to be remembered by enabling a lasting change to the communities we work with who are currently suffering in extreme poverty. We may keep data provided indefinitely to carry out the administration of legacies (sometimes we have to prove how long someone has supported KCT) and to communicate with the families of those leaving us legacies.

If you have any questions about our Data Protection Policy, please contact us in writing at: Data Controller, Kisumu Children Trust, 1, Thorpe Avenue, Tonbridge, Kent, TN10 4PW or Email: [office@kisumuchildren.org.uk](mailto:office@kisumuchildren.org.uk).

### ***I) Security***

We ensure that we have appropriate technical controls in place to protect any personal data that supporters provide. For example, we ensure that our website hosting is with a reputable supplier who ensures that the network is protected and routinely monitored. Despite all our efforts, the internet cannot be guaranteed to be 100% secure, and there is always a risk when you submit data. Nevertheless, we have done all we can to protect supporter data in full compliance with best practice.

We ensure that access to personal data is restricted only to those staff members or volunteers whose job roles require such access and that suitable training is provided for these staff members and volunteers.

We may make limited use from time to time of trusted external companies to collect or process personal data on our behalf, such as fulfilling orders or processing donations. When we do so, we use reputable companies and take reasonable precautions to ensure they will handle personal data securely and safely. When we do use external companies, we remain responsible for the storing and processing of supporter personal data.

### ***J) Credit / Debit card security***

If you use supporter debit or credit card to donate to us, purchase something or pay for a trip, whether online, over the phone or by mail, we will process supporter information securely in accordance with the Payment Card Industry Data Standard.

We do not store supporter debit or credit card details once a supporter transaction has been completed. We hold bank account details for the purpose of collecting direct debits in accordance with direct debit mandate rules.

### ***K) Where we store supporter personal information***

The data we process and store is within the European Economic Area (EEA). It may be that some of our suppliers use cloud-based storage; however, we take steps to make sure they provide an adequate level of protection in accordance with UK data protection law. We adopt the Information Commissioners approved measures and therefore ensure that personal data is held in compliance with European data protection regulations. We take all reasonable steps to ensure that supporter data is stored and processed securely in accordance with this policy. By submitting any supporter personal data you agree to this transfer, storing and processing of supporter information.

Should you travel with us to our project in Africa, we may share personal information with partners who plan and prepare the arrangements for supporter trip. For example, this may include sensitive personal data such as medical information and passport details. When we do so we will make you aware of the data being transferred and gain supporter consent to do so.

#### *When we share supporter information*

We do not share or swap supporter information with any other charities or organisations for the purposes of their marketing – as this would then conflict with our core values and desire to treat supporters with respect.

#### *Legal Duty*

We may need to pass on information if required by law or by a regulatory body. For example, a Gift Aid audit by the HMRC, or if asked for details by a law enforcement agency.

### ***L) Our service providers and third parties***

From time to time we may employ trusted suppliers to carry out tasks on our behalf, such as fulfilling orders, managing events, supporting our systems, or processing donations. These agents are bound by contract to protect supporter data and we remain responsible for their actions.

We may provide third parties with general information about users of our site, but this information is both aggregated and anonymous. However, we may use IP address information to identify a user if we feel that there are or may be safety and/or security issues or to comply with legal requirements.

### ***M) Cookies***

#### *What are cookies?*

We collect data using cookies. A cookie is a text file that is sent from our website as soon as you visit the site. It is stored on supporter computer's hard drive and helps us to identify the supporter's computer (not you) and collects information in an aggregate, anonymous way.

We collect cookies:

- To enable users to complete actions on our website without creating an account
- For account registration and logging in

#### *How do we use cookies?*

Cookies may be used to collect information about supporter visit to our website, such as:

- Traffic data
- Location data
- Device information
- The date and time of supporter visit
- The pages that you visit

We may use this information to:

- Customise the content on our website and help to understand visitors' current and future needs
- Process any requests, applications or transactions you may make
- Aid internal administration and analysis

You can find out more about cookies at Cookiepedia and at [aboutcookies.org.uk](http://aboutcookies.org.uk)

### *Managing Cookies*

Most browsers allow you to turn off the cookie function. To do this you can look at the help function on supporter browser or visit [aboutcookies.org.uk](http://aboutcookies.org.uk). To experience the KCT website to the full, we recommend that you leave cookies turned on. If you turn off cookies then you may not be able to enter parts of the site.

### *Third Party Cookies*

KCT works with a number of third party suppliers who set cookies on our website to enable them to provide us with services. These are mainly used for reporting and advertising purposes so we can improve the way we communicate.

We use websites such as YouTube and Vimeo to embed videos and you may be sent cookies from these websites. We do not control the setting of these cookies, so we suggest you check the third party website for more information about their cookies and how to manage them.

KCT also uses third party suppliers such as Facebook, Google Analytics, and these providers may use cookies. They may also use tracking pixels, which are commonly found in advertising to track the effectiveness of adverts.

As some of these services may be based outside of the UK and the European Union, they may not fall under the jurisdiction of UK courts. If you are concerned about this you can change your supporter cookie settings (see above) and thus you can find more information about this.

## ***N) How we treat children and vulnerable persons***

### *Aged 12 or under*

We do not actively seek to collect children's data (other than those under our care with CBCH and KCM) and require a date of birth for anyone under 21.

### *Supporters in vulnerable circumstances*

We recognise the importance of identifying and supporting supporters in vulnerable circumstances. KCT Trustees or members staff who send or respond to supporter emails, mailings or calls are trained to identify signs of vulnerable circumstances and to deal with the supporter appropriately in line with our "Guidelines for safeguarding vulnerable supporters" policy. Personal information will be recorded so that we may respond appropriately in future, for example, by ceasing fundraising requests or no longer making calls.

## ***O) Supporter choices and telling us when things change***

### *Preferences*

You can change supporter preferences on which communications you receive from us, including marketing and fundraising materials, or how we contact you, by mail, phone or email, at any time.

You can do so by calling us on: 01732 369 303 or by writing to us at: Data Controller, Kisumu Children Trust, 1, Thorpe Avenue, Tonbridge, Kent TN10 4PW, or by email: office@kisumuchildren.org.uk.

### *Updating supporter details*

We want to communicate with you effectively. It's much easier if supporter details are up to date, so we really appreciate it if you let us know when supporter details change. You can do so in the same way as updating supporter preferences (above). If we are unsure of the details you have entered on a form, or if you have changed address and given the Post Office permission to share this, we may use Post Office address search, postcode lists or other available sources to confirm data that you provide us with. However, if you continue to give regularly and items such as the KCT magazine *Kisumu News* are returned to us, we may use external sources, for example, the BT Directory, to update supporter address details if we are unable to reach you in any other way. This is so that we may update you on how supporter money has been spent through our news and stories.

### *Supporter information – supporter rights*

For any of the following areas, please contact the Data Controller at the address given above under “Preferences”.

- Telling us to stop processing. You have the right to ask us to stop using supporter personal information for marketing purposes or for any other purpose where there is no legal requirement for continued processing.
- How to request a copy of the information that we hold about you, otherwise known as a Subject Access Request – you have the right to ask for a copy of all the information related to you that we hold.
- How to ask us to amend or delete supporter information. If supporter information is out of date, or if there is no longer justification for us to hold it, you can ask for it to be updated, removed or blocked by contacting the Data Protection Officer in writing.
- How to request supporter information. You can ask for a copy of any personal information that you have provided to us in the past. We will provide it in a clear and easy to follow format.

### ***P) Changes to this policy***

This policy was last updated in September 2018. We may amend this policy from time to time to take account of changes to our processes or changes to data protection or other associated legislation. If we make any significant changes to this policy we will show this clearly on our website, and/or by contacting you directly.

Reviewed and agreed by Trustees at their meeting on Saturday, 26<sup>th</sup> January 2019

Signed on their behalf \_\_\_\_\_ *Peter Brierley* \_\_\_\_\_ Chair of Trustees

Signed copies to the Chair (for his files), Vice-Chair for Minute book, and to Trustee for IT input