

GLOBAL FUND FOR FORGOTTEN PEOPLE – PRIVACY STATEMENT

This statement explains how we collect, process and protect people’s personal data, and how people can exercise their rights over it.

This statement is intended to provide a succinct, easily understood overview of what we do with people's personal data. If you have any questions or concerns about the information in this statement, or about our handling of personal data more generally, or if you would like more detailed information on a particular point, you should email: eleonor.abou-sakr@forgottenpeople.org or write to the attention of the Data Protection Manager at: 30 Upper High Street, Thame, Oxfordshire OX9 3EZ.

When using the term “personal data” in our Privacy Notice, we mean information that relates to you and allows us to identify you, either directly or in combination with other information that we may hold.

By giving us your personal information, you consent to us collecting and using that information in the ways that we describe in this Privacy Statement and/or in other ways to which you have specifically consented.

Who we are and how to contact us:

We are The Global Fund for Forgotten People, Order of Malta. We are an English company limited by guarantee with company number 08107614 and a registered charity with number 1148427. The Global Fund for Forgotten People, Order of Malta, Inc. is a US 501(c)3 tax-exempt corporation, EIN:45-5295754. Our official address is 30 Upper High Street, Thame, Oxfordshire OX9 3EZ.

We are a vehicle for supporting the charitable works of the Sovereign Order of Malta (<https://www.orderofmalta.int/>), a lay religious order of the Catholic Church.

We are registered with the Information Commissioner’s Office, registration number ZA372971.

What personal data we collect and how we collect it:

1. When you interact with us, we may collect the following information:
 - i. Personal information and contact details: your name, address, email address, telephone number and other personal information. We collect this when you contact us, sign up for newsletters, donate by post, telephone or through our website, or when you interact with us on social media (on Facebook, Instagram, Twitter and LinkedIn)
 - ii. Bank details: your name, sort code and account number. We collect this when you make a gift to us
 - iii. Details relating to donations, gift aid and other payments where these are necessary. We collect or may request this when you make a donation.
 - iv. Non-personalised data: such as IP addresses, domain names, details of web pages visited and files downloaded, using cookies. We collect this information about how our website is used. We collect this when you use our website
 - v. Recruitment: information collected as part of our staff or volunteer recruitment processes. We collect this when you apply for a job or volunteering opportunity
 - vi. Legacy administration: we collect personal data necessary for legacy administration, from the executor or anyone with an interest in the estate

- vii. Personal details about beneficiaries: stories, medical histories, religious information and images of those supported thanks to grants awarded by the Fund. We collect this from partner organisations within the Order
 - viii. Further details on donors or potential donors: data from publically available resources or trusted third parties. We collect this through our research
2. We hold contact details of the Boards, members, volunteers and staff of the Order, and staff at partner organisations of the Order, in connection with the making and administering of grants.
 3. Personal details collected in this way will only be used to provide you with information you would reasonably expect or have agreed to, in accordance with this Statement.

How and why we process personal data:

4. As a fundraising charity, we store and use the names and contact details of current, prior and potential donors, as well as their donation history and related information about their interactions with us, in order to process donations, better tailor the information we may send by email or post, invite you to participate in events or campaigns, and to keep you up to date with progress on works supported by the Fund.
5. As part of our fundraising activities, we may gather information about you from publicly available sources and use trusted third parties to carry out research and due diligence, in order to comply with anti-money-laundering regulations, and to help us to understand more about you as an individual and your ability to support us. By doing this, we can focus our engagement with you in the most effective way and ensure that we provide you with a personalised experience that is appropriate for you.
If you would rather your personal data was not used in this way, you can contact: eleanor.abou-sakr@forgottenpeople.org
6. We may send you newsletters, if you have subscribed or indicated that you are happy to receive them. We will provide you with news, information about our fundraising, and opportunities and invitations to donate or support the Fund. You can choose to opt out of receiving email newsletters at any time by clicking on the relevant unsubscribe link at the bottom of any newsletter or by contacting us: eleanor.abou-sakr@forgottenpeople.org
7. Occasionally we may need to contact you for administrative or operational reasons, for example, to send you confirmation of your donation. These communications are made for legal or administrative reasons and, as such, you will continue to receive them even if you opt out of receiving marketing communications from us.
8. In order to analyse how visitors use our website, to improve our service, and to provide you with more relevant content, we may use technologies, such as cookies or other tracking software.
Our website uses Google Analytics to collect information about how you use it, how you reached it, the pages you visit, how long you stay and what you click on. We use reports provided by Google Analytics to help us understand website traffic and webpage usage, and ensure that the site is meeting the needs of its users. Google Analytics does not identify users or associate your IP address with any other data held by Google. Any information provided by Google Analytic cannot be used to identify you.

9. Additional cookies, linked to third parties, may also be used on our website. For more information on our use of cookies, please read our [cookies policy](#). You may refuse the use of cookies by selecting the appropriate settings on your browser.
10. In order for us to understand how our supporters interact with the emails that we send and make the content that we send as relevant to you as possible, the email tools we use let us know if the emails we send are opened or links are clicked on.
11. Because the Order is a Catholic organisation, the personal data of its members, staff and volunteers per se can constitute information about their religious beliefs, which is a “special category of data” under the law subject to additional protections. We process that data on the basis of the exemption in the law for the legitimate activities of a not-for-profit body with a religious aim.

The legal basis on which we process it

12. The General Data Protection Regulation requires organisations to consider the legal basis on which they process personal data. The Fund will process personal data in line with the following principles:
 - i. Legal obligation: where it is necessary for us to fulfil a contract or comply with a legal obligation, for example, if you are a staff member, supplier, or when you make a donation
 - ii. Informed consent: we will only send you our email newsletters with your explicit consent, having actively subscribed to receive them online, in writing, or in person
 - iii. Legitimate interest: as part of our engagement and efforts to build long-term relationships with our supporters, we will carry out our fundraising and grant-making activities on the basis of our legitimate interest in raising funds for our charitable activities and will send you communications unless you have told us that you do not wish to receive them. We also process the personal data of the board, members, volunteers and staff of the Order on the basis of our legitimate interest in managing our relationship with the Order and our grant making process
13. When we process your personal information for our legitimate interests, we make sure that we consider and balance any potential impact on you, both positive and negative, and your rights under data protection laws.

Who we share your personal data with:

14. The Fund will not share your data with any other charity, public body or commercial organisation, unless we have to do so either for legal or compliance reasons. We do not share your contact details and other personal data with any other charities or companies for marketing purposes.
15. In rare cases, we may share personal data with the Sovereign Order of Malta, consistent with our status as their charitable vehicle, for administrative or legal reasons, or in such cases where you may be attending official events.
16. We may share personal data with our service provider organisations, such as IT providers, if necessary to allow them to provide their service to us. We have put appropriate measures in place with them requiring them to keep that data safe.

How long we keep it for:

17. We will keep your personal data only for as long as we consider it necessary to carry out each processing activity.
18. On the whole, we will retain the contact details of donors for the duration of our relationship with them, and for up to 10 years afterwards, depending on the nature of that relationship. It may sometimes be necessary to retain personal data for an indefinite amount of time for legal or compliance reasons, for example to maintain accurate gift records, or if you have mentioned to us that you have included a gift to the Fund in your will.
19. We retain the details of the members, staff and volunteers of the Order or of partner organisations for so long as they remain in roles relevant to our relationship or activities.
20. If you subscribe to receive our newsletter, your personal data will remain on mailing list until such time that you unsubscribe.
21. If you ask us not to contact you any more, we will keep some basic information about you on our suppression list in order to avoid sending you unwanted materials in the future.

Securing your personal data:

22. We are committed to taking appropriate technical and organisational measures to protect your personal data against unauthorised or unlawful processing and against accidental loss, destruction or damage. Although we use appropriate security measures, the transmission of information over the internet is never completely secure. We do our best to protect personal information but we cannot guarantee the security of information transmitted to our website.
23. Once received, the personal data that you provide will be held in our systems, which are located on our premises or those of an appointed third party, acting as our Data Processor.
24. An exception to this is credit card details sent to our website. For online giving, the Fund uses Paypal, which specialises in the secure capture and processing of online transactions. The credit card form is secure, and your information is encrypted and stored on a secure database. The Fund does not retain any card payment information for donations received through PayPal.

Your rights and how to exercise them

25. The law gives you certain rights in respect of the information that we hold about you. The website of the Information Commissioner's Office (<http://www.ico.org.uk>) contains useful information on your rights over your personal data.
 - i. **Find out what personal information we hold about you:** with some exceptions designed to protect the rights of others, you have the right to a copy of the personal data that we hold about you, as well as information about what we do with it, who we share it with and how long we will hold it for. We may make a reasonable charge for additional copies or where the request is manifestly unfounded or excessive, based on our administrative costs.
 - ii. **Change the personal information we hold about you:** you have the right to update or correct the information we hold about you if it is inaccurate.

- iii. **Have your information restricted or deleted in some circumstances:** you have the right to require us to delete the information that we hold about you if it is no longer necessary for the purpose we collected it for and there is no other legal basis on which we must, or are allowed to, retain it.
- iv. **Stop receiving fundraising communications from us:** you have the right to require us to stop contacting you for fundraising or marketing purposes.

In order to request any of the above actions, please contact us: eleonor.abou-sakr@forgottenpeople.org or write to us at: 30 Upper High Street, Thame, Oxfordshire OX9 3EZ.

Please let us know if you have any queries or concerns about the way that your data is being processed by contacting us on the details above. You are also entitled to make a complaint to the Information Commissioner's Office. For further details, see the Information Commissioner's guidance at <https://ico.org.uk/for-the-public/personal-information>.

Our Privacy Statement may change from time to time and the updated version will be published on our website. Please check occasionally to see if we have included any updates or changes and check that you are happy with them.

May 2019