

Chab Dai Privacy Policy

Chab Dai is committed to taking care of your personal data that we process, regardless of your relationship with us (website visitor, donor, partner, researcher, [social media follower,] newsletter recipient or collaborator). In this policy we set out how we use, and manage your data.

When you use our website we want you to be clear about your privacy rights and how the law protects you. Chab Dai also aims to work in adherence with ISO27001, the international standard for information security.

Who we are

Our UK website [www.chabdai.org], communications and fundraising is run by CD UK, we also have our CD partners overseas (for more information see CD Overseas and Data Transfers sections below).

Chab Dai UK is a Charitable Incorporated Organisation (CIO) registered with the Charity Commission for England and Wales under registration number 1188067. Our registered address in the UK is 4, West Links, 18 Ellesmere Road, Uphill, Weston super Mare, BS23 4UU.

This Privacy Policy primarily relates to information which is obtained by Chab Dai UK and for which Chab Dai is the Data Controller. That is to say, data for which Chab Dai sets the purpose of the use as well as how this data will be used. For more information please see Contact Details below.

CD Overseas

Chab Dai Coalition in Cambodia is registered with the Royal Government of Cambodia's Ministry of Foreign Affairs as an international charity organisation under the legal sponsorship of Chab Dai UK. Our address in Cambodia is P.O. Box 1010, Phnom Penh, Cambodia.

Chab Dai International, overseen by a Board of Directors made up of international members both external and internal to other Chab Dai offices, is registered as a public benefit corporation in California (USA), and as a registered public charity with 501c3 tax-exempt status with the United States Internal Revenue Service (IRS) under EIN 26-4646578. Financial accountability documents can be downloaded from our profile on Guidestar. Our registered address in the USA is 6808 North Ashland Boulevard, Chicago, IL 60626, USA

Chab Dai's Purpose

Our vision - We see a world where communities live in dignity, harmony, and freedom.

Our Mission - We seek to end all forms of abuse and modern slavery globally by building a movement to empower communities, to strengthen systems, and to restore justice and wellbeing with survivors.

We believe that true social change will only occur through the innovation of collaboration. By combining the efforts made by various sectors committed to a common agenda, we



further our collective impact. We believe that no single organisation or sector can bring an end to human trafficking. Instead, we must collaborate through means such as knowledge and resource sharing, referring cases between organisation partners, and advocating together for positive policy changes on national and international governmental levels.

Why we hold your data

We hold and process our supporters' personal data for a number of reasons:

- To action request and projects to support and deliver CD Purpose;
- To keep a record of donations and actions taken by our supporters and our communications with them
- To send our supporters and researchers information to keep you up-to-date on our work via emails, social media, reports (Impact and Annual) and newsletters
- To send our supporters marketing information via emails, social media reports and newsletters about our projects, fundraising activities and appeals where we have their consent or are otherwise allowed to
- To support our volunteers by sharing event information via email
- To record campaigning actions by supporters
- To support community based fundraising and campaigning
- To claim gift aid on donations
- To fulfil contractual obligations entered into with supporters
- To comply with legal obligations
- To manage our organisation (such as email contact for services or supplies)
- To ensure we do not send unwanted information to supporters or members of the public who have informed us they do not wish to be contacted

These reasons are underpinned by a "legal basis" under GDPR. The law on data protection sets out a number of different reasons for organisations to collect and process your personal data: When collecting your personal data, we will always make clear to you which data is necessary for a particular purpose.

Consent

Where we are a Data Controller, we will ask for your permission and/or provide you with necessary notifications to send you direct marketing communications. We will do this through a clear statement of what you will receive and allow you to select only those channels that you wish to hear from us by.

For more information on the types of marketing please see *When and why we will send you* a personalised marketing communications section.



If you change your mind you can opt out from Chab Dai UK marketing communications by sending your request to info@chabdai.org or privacy@chabdai.org or via our feedback form on the website.

Children's Privacy

If you are a parent or guardian and you are aware that your child has provided us with Personal Data, please contact us. If we become aware that we have collected Personal Data from anyone under the age of 13 without verification of parental consent, we take steps to remove that information.

Legitimate interest

In specific situations, we process your data to pursue our legitimate interests namely our CD Purpose, in ways which might reasonably be expected and which do not materially impact your rights, freedom or interests. Chab Dais use of legitimate interest includes the following:

- We from time to time analyse your previous support of Chab Dai in order to offer relevant ways of supporting us in the future, we will limit personal data where required to do this.
- To help identify businesses who have indicated interest in supporting Chab Dai, we may (where we have necessary consent/notifications as applicable) send emails to individuals where relevant to their job, for instance public profiles of people working in Corporate Social Responsibility.

Your data protection rights

Under data protection law, there are a number of individual rights you have including:

Your right of access - You have the right to ask us for copies of your personal information.

Your right to rectification - You have the right to ask us to rectify personal information that is inaccurate or incomplete.

Your right to erasure - You have the right to ask us to erase your personal information in certain circumstances.

Your right to restriction of processing - You have the right to ask us to restrict the processing of your personal information in certain circumstances.

Your right to object to processing - You have the right to object to the processing of your personal information in certain circumstances, such as for marketing.

Your right to data portability - You have the right to ask that we transfer the personal information you gave us to another organisation, or to you, in certain circumstances.

You are not required to pay any charge for exercising your rights. If you make a request, we typically have one month to respond to you.



Please Contact Us if you wish to make a request to exercise these rights at any time.

Legal compliance

If the law requires us to, we may need to collect and process your data. For example, where you sign up to the Gift Aid scheme, we will process your data for the purposes of submitting a Gift Aid claim to HMRC.

Under certain circumstances, Chab Dai may be required to disclose your personal data if required to do so by law or in response to valid requests by public authorities (e.g. a court or a government agency).

Chab Dai may also disclose your personal data in the good faith belief that such action is necessary to:

- Comply with a legal obligation
- Protect and defend the rights or property of Chab Dai
- Prevent or investigate possible wrongdoing in connection with the website or persons we seek to protect
- Protect the personal safety of our website users or the public
- Protect against legal liability

Public Interest

In limited situations we may use data in the public interest. It is likely to be in the public interest to collect data to prevent crime or safeguard the wellbeing of people with whom we work.

When and why we will send you personalised marketing communications

Chab Dai will only contact you for marketing purposes – for example fundraising campaigns or let you know of ways in which you can support that work – where we have your necessary consent (as applicable).

We will make it easy for you to tell us if you would like to receive marketing communications from us and hear more about our work and the ways in which you would like to receive this information. We will ask you to reconfirm your consent if we have evidence that suggests you may no longer wish to hear from us. We will never knowingly send you marketing material if you have told us that you do not wish to receive it. In the event you wish to no longer receive marketing communications and wish to opt out please contact info@chabdai.org or privacy@chabdai.org or via our feedback form on the website. Please note you may still receive non-marketing communications depending on how you engage with us.



Types of Data Collected

Chab Dai may collect your personal data in the following circumstances:

1. When you give it to us directly

You may give us your personal data directly when you make a donation, sign up for one of fundraising events (such as the Royal Parks Half marathon) or when you communicate directly with us.

2. When you give it to us indirectly

You may give us your information indirectly when you sign up to events and donate to us via fundraising sites like JustGiving. These independent third parties will pass your data to us where you have indicated that you wish to support Chab Dai and have notified the same.

3. When you access Chab Dai's Social Media

We might also obtain your personal data, such as your email address, through your use of social media such as Facebook, WhatsApp, Twitter or LinkedIn, depending on your settings or the privacy policies of these social media and messaging services, please review these beforehand. To change your settings on these services, please refer to their privacy notices, which should tell you how to do this.

- Facebook privacy notice
- <u>Twitter privacy notice</u>
- WhatsApp privacy notice
- LinkedIn privacy notice

As an organisation we also use third party [marketing/targeting] companies <u>Mailchimp</u> and <u>Hootsuite</u> for the following purposes to schedule posts, collect post data and prepare our newsletters which [does or does not] involve processing your personal data and their privacy notices can be viewed on their websites. [To withdraw your consent please Contact Us or you may click to opt out on the email notification].

4. When the information is publicly available

We might also obtain personal data about individuals and organisations who may be interested in giving major gifts to charities or organisations like Chab Dai. In this scenario, we may seek to find out more about these persons, their interests and motivations for giving through publicly available information.



We may also gather information if your activities relate to our work – for instance, if you are a public figure such as a Member of Parliament or you represent an organisation which we work with or which is related to one of our projects we may gather information about you in order to inform our project and make decisions – for instance, whether we engage with you to seek your support for our work, ask your constituents to write to you, or choose to work you in another way.

5. When we use Tracking Technologies and Cookies

Tracking technologies typically used are beacons, tags, and scripts to collect and track information and to improve and analyse our website.

Cookies are a useful way for us to understand how supporters use our website. When you visit our website we will collect data from your computer or other device such as a smartphone or tablet through the use of "cookies". Cookies are created by your web browser when you visit our website. Every time you go back to the Chab Dai website, your browser will send the cookie file back to the website's server. They improve your experience of using our website, for example, by remembering your preference settings so that you are presented with information likely to be most relevant to you, and by measuring your use of the website to enable us to continuously improve our website to ensure that it meets your needs.

If you visit our website as an anonymous visitor (e.g. you switch off cookies), Chab Dai may still collect certain information from your browser, such as the IP address (an IP address is a number that can uniquely identify a computer or other internet device).

What information might Chab Dai collect about you?

We only collect personal data relevant to the type of transactions or interaction you have with Chab Dai.

Whatever your interaction with us this information will be minimal and linked to the purpose for which we need it, for example, when you contact us to make a donation or sign up to online content (such as newsletters) or you telephone, email, write to or text Chab Dai, or engage with us via social media channels, we may receive and retain personal information such as your email address.

In these cases we are likely to process details such as your name, email address, postal address, telephone or mobile number, bank account details to process donations and whether or not you are a taxpayer so that we can claim Gift Aid. If you participate in an event we may (with your permission or notification as applicable) take your photograph or video, or interview you.



Special Personal Data

We only collect "sensitive personal data" about our supporters where there is a clear, specific and lawful reason for doing so. We collect this data where we need it to ensure that we provide appropriate facilities or support to enable you to participate in the event or carry out your role.

Security

All sensitive personal data is stored on a secure database, to which only a limited number of relevant staff have access. It is deleted when no longer relevant, is never shared with third parties, and is available to you at any point should you wish to see it.

Please consider that no method of transmission over the internet, or method of electronic storage is 100% secure. While we strive to use commercially acceptable means to protect your personal aata, we cannot guarantee its absolute security for transmission and onward use outside our reasonable control.

How will Chab Dai use your personal data?

Chab Dai will use your personal information for the following purposes;

- We may contact you for reasons related to administering any donations you have made, your tax status with regard to Gift Aid if claimed, the completion of commercial or other transactions you have entered into with Chab Dai or the activity or online content you have signed up for;
- to confirm receipt of donations (unless you have asked us not to do this), and to say thank you and provide details of how your donation might be used.;
- in relation to correspondence you have entered into with us whether by letter, email, text, social media, message board or any other means, and to contact you about any content you provide;
- for internal record keeping so as to keep a record of your relationship with us;
- to keep your data up to date
- to implement any instructions you give us to with regard to withdrawing consent to send marketing information or informing us through the Fundraising Preference Service that you do not wish to receive any marketing information;
- to use IP addresses to identify the location of users, to block disruptive use and to establish the number of visits from different countries;
- to protect our staff and those with whom we work

Chab Dai will not share or sell your personal data with any third party for their own marketing purposes, [and except for Chab Dai Cambodia and US] you will not receive marketing from any other companies, charities or other organisations as a result of giving your details to us.

How long will Chab Dai keep your personal information?

We will hold your personal information on our systems for as long as is necessary for the relevant activity and in compliance with legal guidelines, for example we will keep a record of donations subject to gift aid for at least seven years to comply with HMRC rules.

If you request that we stop sending you marketing materials we will keep a record of your contact details and appropriate information to enable us to comply with your request not to be contacted by us.

Legacy income is vital to the running of the charity. We may keep data you provide to us to carry out legacy administration and communicate effectively with the families of people leaving us legacies. This also enables us to identify and analyse the source of legacy income we receive.

Where you contribute material to us, e.g. user generated content or in response to a particular campaign, we will only keep your content for as long as is reasonably required and necessary for the purpose(s) for which it was submitted unless otherwise stated at the point of generation.

Contact Us

If you wish to change how we communicate with you, or update the information we hold, please contact us via the post, email, feedback form on the website or by telephone. If you have feedback or a complaint, you can submit the details via our website, the post, email or a phone call. All our contact information can be found on our website.

https://www.chabdai.org/contact

Links to Other Websites

Our website may contain links to other websites (such as blog links to a Coalition member site) that are not operated by Chab Dai. If you click on a third party link, you will be directed to that third party's site. We strongly advise you to review the Privacy Policy of every site you visit.

We have no control over and assume no responsibility for the content, privacy policies or practices of any third party sites or services.



Privacy Policy Review

This Privacy Policy may be updated from time to time so please do check it periodically. If you do not agree to the changes, please Contact Us to discuss your preferences.

April 2022