

## **Privacy Policy**

### **1. Introduction**

1.1 We are committed to protecting your privacy and will only use the information that we collect about you lawfully. This privacy notice is intended to give you an understanding of how and why we use the information you give us.

1.2 Our Compliance Manager is responsible for data protection compliance. If you have any questions about this privacy notice please contact them at [dataprotectionireland@WVEU.org](mailto:dataprotectionireland@WVEU.org)

1.3 Please read the following carefully to understand our practices regarding your personal data and how we will treat it. By using our website or providing us with your personal information you agree to your personal information being used and stored in the manner set out in this policy. We may update this policy from time to time without notice to you, so please check it regularly.

### **2. We may collect information about you**

2.1 We may collect information from you in the following instances:

(a) Making a donation;

(b) Creating a direct debit donation, signing up for information/newsletters, or sponsoring someone that is fundraising on our behalf;

(c) To record the contact and transactional details on a database in order to manage our supporter relationships;

(d) As part of the Child Sponsorship journey, you will receive information relating to your Sponsorship and your Sponsored Child from World Vision Ireland via email, post or phone call. You will also receive annual updates from the field about your Sponsored Child's progress at school, home, their general health and wellbeing and updated photos and other information relating to your Sponsored child;

(e) As part of the Childhood Rescue journey, you will receive information relating to your contribution to our work with children caught up in emergency situations around the world from World Vision Ireland via email, post, SMS or phone call. You may also receive updates on other World Vision work that might be of interest to you.

2.2 If you interact with us in one of the ways listed above, we may collect and process personal information about you such as:

(a) Your name, address, email address, telephone number, your age;

(b) Information you enter onto our website or in other hard copy forms at an event;

(c) Records of your correspondence with us, if you have contacted us;

(d) Details of your visit to our website, including your IP address;

(e) Financial information such as your bank or card details;

(f) Whether you have a relationship to another supporter (e.g. husband/wife).

2.3 We may also collect sensitive personal information about you, such as details about a health condition or disability, where it will mean we can communicate with you appropriately in the future. We may also collect this information if you plan to attend an event.

2.4 When your political affiliation or religious beliefs are of general public knowledge, we may also record that information against your profile. If they are not in the public domain, we will only do so where we have your consent or drawn this specifically to your attention.

2.6 You attend an event or activity where we may take photographs and videos. Your image may be used in print and digital formats, including print publications, websites, film and social media. We will always inform you if photography or filming is being carried out by us at an event. Event participants have the right to decide whether their images are taken and how these may be used and stored by us.

Information we receive from other sources:

2.7 Your information may be given to us by third parties. They will do so pursuant to their own policies on data protection and privacy. It is a good idea to check their privacy policy when you provide your information to them to fully understand how they will process your data and may share it with others.

2.8 Please refer to paragraphs 3.2 and 3.3 for further details on information we receive from other sources.

### **3. Why and how we use your information and on what basis**

3.1 GDPR provides 7 legal bases for processing your data. We will only process your data under one of the following bases:

(a) Contract (usually our HR and employee data)

(b) Consent (usually our supporter data where you have given specific, granular opt-in permission to process your data to fulfil our relationship)

(c) Legitimate Interest (where consent is unnecessary and our processing is considered expected and non-intrusive)

3.2 We will process your personal information in accordance with this policy and our obligations under applicable data protection laws and regulations, for one or more of the following purposes:

(a) To administer your purchase or donation or support your fundraising, including processing Gift Aid;

(b) To provide you with the services, activities or information you have indicated you are happy to receive or which you have asked for;

(c) To comply with applicable laws and regulations, and requests from statutory agencies;

(d) For our own internal administrative purposes and to keep a record of your relationship with us;

(e) For the purposes of internal research such as supporter satisfaction research;

(f) For marketing purposes, to provide you with information about us, our fundraising campaigns, the opportunity to leave a gift in a will, our events, our services, and any other information, products, activities or services that we provide or provide access to (e.g. supporter updates);

(g) Where you have provided your consent, to publish details of your story;

(h) To provide you with information about volunteering opportunities;

(i) To provide you with details about our campaigns

(j) To provide essential event information where you have signed up to attend;

(k) To manage your communication preferences with us generally;

(l) To provide you with information about goods or services we feel may interest you;

(m) To notify you about changes to our service and/or donor/sponsorship opportunities;

(n) To ensure that content from our website is presented in the most effective manner for you and for your computer/mobile device.

3.3 Where the law allows us to do so, in order to improve the quality and accuracy of the information you have provided to us, we regularly check the accuracy of the data we already hold about you (such as your telephone number, email address or address) against external data lists which are in the public domain. We may also use third parties to check this on our behalf. We will only check the accuracy of the existing information we hold. If, for example, you have not provided us with a telephone number, we will not obtain a telephone number for you and use it to contact you. If we obtain updated details, we would combine this with the information we currently hold about you.

3.4 We may use unautomated profiling and screening techniques to analyse your personal information and create a profile about you, your interests and preferences from publicly available information. This helps us to ensure communications are relevant and we make appropriate requests for donations and other forms of support. The types of information collected about you from the public domain will include:

(a) Your age;

(b) Your qualifications;

(c) A wealth band which will be an estimate of your wealth based on publicly available information;

(d) Your trusteeships and the type of charity which you are a trustee of i.e. grant making);

(e) Your company directorships;

(f) Your donation history;

3.5 Occasionally we may use the information you provide to us to improve the accuracy and relevancy of any digital advertisements you receive. This could include securely providing contact details such as your name and email address to digital advertising networks or social media companies such as Facebook, Google and Twitter. We may also use your information to enable us to

display adverts to potential supporters who have similar characteristics to you, such as lookalike audiences.

Any information we share with social media companies will be shared in an encrypted format and will not be used for their own purposes. You can stop your information being used for this by contacting us.

Where you have asked us not to use your information for targeted digital advertising, you may still see adverts related to World Vision. This is because certain social media sites or advertising networks may select you based on information they hold, such as your age and location, or websites you have visited, without using information that has been provided by us.

You can control the kind of advertising you see through the relevant social media sites:

- [Facebook](https://www.facebook.com/help/568137493302217) - <https://www.facebook.com/help/568137493302217>
- [LinkedIn](https://www.linkedin.com/help/linkedin/answer/62931) - <https://www.linkedin.com/help/linkedin/answer/62931>
- [Twitter](https://business.twitter.com/en/help/troubleshooting/how-twitter-ads-work.html) - <https://business.twitter.com/en/help/troubleshooting/how-twitter-ads-work.html>

#### **4. Where is your information stored**

4.1 The information we collect from you may be transferred to and stored at a destination outside the European Economic Area (“EEA”), e.g. the World Vision offices of the communities we support. It may also be processed by persons operating outside of the EEA. If we send your personal data outside the EEA we will take reasonable steps to ensure that the recipient implements GDPR-compliant measures to protect your information. By submitting your details you agree to this use of your data.

4.2 Online payment transactions will be encrypted. Where we have given you (or where you have chosen) a password which enables you to access certain parts of our site, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.

4.3 The transmission of information via the internet is not completely secure (though note that online payment transactions are securely encrypted). Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our site; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

#### **5. How long do we keep your data**

5.1 We will process and retain your data only for the minimum required period in line with our data retention policy. Please be aware that in the event of exercising your right to erasure we will inform you if we are unable to do so due to overriding legal obligations.

#### **6. Who has access to your information / who we share your data with**

6.1 We may allow our staff, consultants and/or external providers acting on our behalf to access and use your information for the purposes for which you have provided it to us (e.g. to deliver mailings, analyse data and to process payments) or for purposes set out in this privacy notice. We will only provide them with the information they need to deliver the relevant service. We will ensure

your information is transferred securely and treated with the same diligence as if we were handling it directly.

6.2 We do not sell your data to third parties for the purposes of marketing. In other cases we will not share your personal data with third parties except in accordance with this privacy notice or when we have your permission.

6.3 We may disclose your information to other organisations and agencies if we are under a duty to disclose or share it in order to comply with any legal obligation, or in order to enforce or apply any agreements; or to protect the rights, property or safety of us or others.

## **7. World Vision partnership**

7.1 We may need to disclose your information to other offices in some circumstances with your consent. World Vision Ireland is part of the World Vision partnership which works in almost 100 countries. World Vision offices in other countries may be best placed to manage your relationship and provide you with any necessary support.

7.2 We will only share your details with another World Vision office in accordance with data protection laws and regulations and where we have your consent to do so.

7.3 Other members of the World Vision partnership may legally be obliged to share data in accordance with their relevant domestic legislation and potential law enforcement requirements.

## **8. Your rights**

8.1 We take your data rights seriously. The General Data Protection Regulation, effective in the Republic of Ireland from May 2018, affords you the following rights:

(a) The right of access – you have the right to request a copy of the information that we hold about you;

(b) The right to rectification – you have the right to correct data that we hold about you that is inaccurate or incomplete;

(c) The right to erasure – in certain circumstances you can ask for the data we hold about you to be erased from our records;

(d) The right to restrict processing – where certain conditions apply you have the right to restrict processing of your data;

(e) The right to data portability – you have the right to have the data we hold about you transferred to another organisation;

(f) The right to object – you have the right to object to certain types of processing such as direct marketing;

(g) Rights in relation to automated decision-making and profiling – we do not carry out automated decision-making and profiling.

For more information on these rights please read the relevant guidance issued by the Data Protection Commissioner: <https://www.dataprotection.ie/en/individuals/rights-individuals-under-general-data-protection-regulation>

8.2 If you request details of the information, we hold about you in accordance with the subject access rights under applicable data protection laws and regulations, under certain circumstances we may charge an administration fee for fulfilling such requests.

8.3 In the event of exercising your data rights we will require suitable identification such as a copy of your passport.

8.4 If you are unhappy with the way we have processed your personal data, please contact our Governance Manager using the contact details set out in clause 1 of this privacy notice. If you remain unhappy with how your complaint is dealt with you should contact the Data Protection Commission <https://www.dataprotection.ie/> Alternatively, you are entitled to make a complaint to the Data Protection Commissioner's Office without first referring your complaint to us.

## **9. Cookies**

9.1 For more information on how cookies are used on our website, please see our cookies policy.

## **10. Changes to our privacy notice**

10.1 We may make changes to this policy from time to time, so we encourage you to check it frequently. By continuing to use our website you will be deemed to have accepted those changes.