

Community TechAid Privacy Policy

Policy ID:	1	Author(s)	Fatima Hassan & Cat Smith
Date Created	18.08.20	Revision	2
Last Review Date	20.02.21		

1. Introduction

Thank you for choosing to be part of our community at Community TechAid. We are committed to protecting your personal information and your right to privacy. If you have any questions or concerns about our policy, or our practices with regards to your personal information, please contact us at contact@communitytechaid.org.uk

When you visit our website [www.communitytechaid.org.uk] and use our services, you trust us with your personal information. We take your privacy very seriously. We seek to explain to you in the clearest way possible what information we collect, how we use it and what rights you have in relation to it. We hope you take some time to read through it carefully, as it is important.

This privacy policy applies to all information collected through our websites (such as app.techaid.ju.ma), and/or any related services, donations, marketing or events (we refer to them collectively in this privacy policy as the "Sites").

Please read this privacy policy carefully as it will help you make informed decisions about sharing your personal information with us.

1. Definitions

Throughout this document the following 2 definitions will be referred to:

- 1.1. Data Subject: A data subject is an identifiable individual person about whom the Charity holds personal data.
- 1.2. Contact Information: for the purposes of this Policy, "Contact Information" means any or all of the person's:
 - full name (including any preferences about how they like to be called);
 - full postal address;
 - telephone and/or mobile number(s);
 - e-mail address(es);
 - social media IDs/Usernames (e.g.: Facebook, Zoom, Hangouts, WhatsApp).

These definitions are the same as the definitions of those terms detailed in Article-4 of the GDPR.

2. Principles of GDPR

Community TechAid will ensure that all personal data that it holds will be:

- 2.1. processed lawfully, fairly and in a transparent manner in relation to individuals;
- 2.2. collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes; further processing for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes shall not be considered to be incompatible with the initial purposes;
- 2.3. adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed;
- 2.4. accurate and, where necessary, kept up to date; every reasonable step must be taken to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay;
- 2.5. kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed; personal data may be stored for longer periods insofar as the personal data will be processed solely for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes subject to implementation of the appropriate technical and organisational measures required by the GDPR in order to safeguard the rights and freedoms of individuals; and
- 2.6. processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures.

3. Who do we collect information from?

Community TechAid collects and uses certain types of personal information about the following categories of individuals:

- 3.1. Individuals who donate equipment to us, known as donors;
- 3.2. Organisations who make requests for our services;
- 3.3. Volunteers & Trustees;
- 1.3. Employees of Community TechAid.

4. What information do we collect?

- 4.1. By Consent

We collect contact information that you voluntarily provide to us when registering at the Sites or Apps, when expressing an interest in obtaining information about us or our services, when participating in activities on the Sites (such as registering as a volunteer, donating digital equipment, requesting digital equipment or posting messages in our online forums) or otherwise contacting us.

This also includes people who are interested in, and wish to be kept informed of, the activities of the Community TechAid, by registering to receive updates and newsletters from ourselves.

We may incorporate some third-party social networking features into our Services (including, allowing users to interact with others and share certain content and information on social media platforms) or utilise third-party provided platforms to publish or manage the Services or portions thereof. Through these platforms and features, we receive or may share information about you, and this Privacy Policy applies to that information as well. In addition, some providers of third-party social media or blogging platforms we utilise have their own privacy policies which explain how the third parties that provide them may collect, use and protect your information (e.g., if you establish an account with such platform providers directly). By using social features, you agree to those third parties' privacy policies and terms of use.

If you choose to communicate with us or another user through social features available on our websites or mobile applications or through our social media pages, or other similar communication or messaging features or services, such information may be made publicly available. **For security purposes, please do not include any password, payment card or other sensitive information via these features.** We have the right, but not the obligation to monitor messages and communications between and among users for security and training purposes. We may, but are not obligated to, remove any content we deem inappropriate.

4.2. Automatic

We automatically collect certain information when you visit, use or navigate the Sites. This information does not reveal your specific identity (like your name or contact information) but may include device and usage information, such as your IP address, browser and device characteristics, operating system, language preferences, referring URLs, device name, country, location, information about how and when you use our Site and other technical information. This information is primarily needed to maintain the security and operation of our Sites, and for our internal analytics and reporting purposes.

Like many businesses, we also collect information through cookies and similar technologies. You can find out more about this in our online Privacy Policy.

4.3. By Contract

People who sell goods and/or services to, and/or purchase goods and/or services from Community TechAid.

The information collected will additionally contain details of:

4.3.1. The goods/services being sold to, or purchased from the Charity;

4.3.2. Bank and other details necessary and relevant to the making or receiving of payments for the goods/services being sold to, or purchased from the Charity.

The information provided will be held and processed solely for the purpose of managing the contract between the Charity and the person for the supply or purchase of goods/services.

5. How do we use your information

We use personal information collected via our Sites for a variety of purposes described below. We process your personal information for these purposes in reliance on our legitimate business interests ("Business Purposes"), in order to enter into or perform a contract with you ("Contractual"), with your consent ("Consent"), and/or for compliance with our legal obligations ("Legal Reasons"). We indicate the specific processing grounds we rely on next to each purpose listed below.

We use the information we collect or receive:

- 5.1. **To facilitate account creation and logon process** [with your Consent]. If you choose to link your account with us to a third party account *(such as your Google account), we use the information you allowed us to collect from those third parties to facilitate account creation and logon process. See the section below headed "Social Logins" for further information.
- 5.2. **To send administrative information to you** [for Business Purposes, Legal Reasons and/or possibly in relation to donations or volunteering]. We may use your personal information to send you product, service and new feature information and/or information about changes to our terms, conditions, and policies.
- 5.3. **Fulfil and manage your orders** [for Contractual reasons]. We may use your information to fulfil and manage your orders, payments, returns, and exchanges made through the Sites. This applies more to organisations we donate to rather than donors or volunteers.
- 5.4. **To post testimonials** [with your Consent]. We post testimonials on our Sites that may contain personal information. Prior to posting a testimonial, we will obtain your consent to use your name and testimonial. If you wish to update, or delete your testimonial, please contact us at contact@communitytechaid.org.uk and be sure to include your name, testimonial location, and contact information.
- 5.5. **Request Feedback** [for our Business Purposes and/or with your Consent]. We may use your information to request feedback and to contact you about your use of our Sites.
- 5.6. **To protect our Sites** [for Business Purposes and/or Legal Reasons]. We may use your information as part of our efforts to keep our Sites safe and secure (for example, for fraud monitoring and prevention).
- 5.7. **To enable user-to-user communications** [with your consent]. We may use your information in order to enable user-to-user communications with each user's consent.
- 5.8. **To enforce our terms, conditions and policies** [for Business Purposes, Legal Reasons and/or possibly Contractual].
- 5.9. **To respond to legal requests and prevent harm** [for Legal Reasons]. If we receive a subpoena or other legal request, we may need to inspect the data we hold to determine how to respond.

5.10. **For other Business Purposes.**

We may use your information for other Business Purposes, such as data analysis, identifying usage trends, determining the effectiveness of our promotional campaigns and to evaluate and improve our Sites, products, services, marketing and your experience.

6. Will your information be shared with anyone?

We only share and disclose your information in the following situations:

- 6.1. **Compliance with Laws.** We may disclose your information where we are legally required to do so in order to comply with applicable law, governmental requests, a judicial proceeding, court order, or legal process, such as in response to a court order or a subpoena (including in response to public authorities to meet national security or law enforcement requirements).
- 6.2. **Vital Interests and Legal Rights.** We may disclose your information where we believe it is necessary to investigate, prevent, or take action regarding potential violations of our policies, suspected fraud, situations involving potential threats to the safety of any person and illegal activities, or as evidence in litigation in which we are involved.
- 6.3. **Vendors, Consultants and Other Third-Party Service Providers.** We may share your data with third party vendors, service providers, contractors or agents who perform services for us or on our behalf and require access to such information to do that work. Examples include: payment processing, data analysis, email delivery and hosting services. We may allow selected third parties to use tracking technology on the Sites, which will enable them to collect data about how you interact with the Sites over time. This information may be used to, among other things, analyse and track data, determine the popularity of certain content and better understand online activity. Unless described in this Policy, we do not share, sell, rent or trade any of your information with third parties for their promotional purposes.
- 6.4. **With your Consent.** We may disclose your personal information for any other purpose with your consent.
- 6.5. **Other Users.** When you share personal information (for example, by posting comments, contributions or other content to the Sites) or otherwise interact with public areas of the Site [or App], such personal information may be viewed by all users and may be publicly distributed outside the Site [and our App] in perpetuity. [If you interact with other users of our Sites and register through a social network (such as Facebook), your contacts on the social network will see your name, profile photo, and descriptions of your activity.] Similarly, other users will be able to view descriptions of your activity, communicate with you within our Sites, and view your profile.

7. How long do we keep your information?

We will only keep your personal information for as long as it is necessary for the purposes set out in this privacy policy, unless a longer retention period is required or permitted by law (such as tax, accounting or other legal requirements). No purpose in this policy will require us keeping your personal information for longer than 12 months.

When we have no ongoing legitimate business need to process your personal information, we will either delete or anonymise it, or, if this is not possible (for example, because your personal information has been stored in backup archives), then we will securely store your personal information and isolate it from any further processing until deletion is possible.

You may at any time review or change the information in your account or terminate your account by:

- Logging into your account settings and updating your account, or
- Contacting us on contact@communitytechaid.org.uk

Upon your request to terminate your account, we will deactivate or delete your account and information from our active databases. However, some information may be retained in our files to prevent fraud, troubleshoot problems, assist with any investigations, enforce our Terms of Use and/or comply with legal requirements.]

8. How do we keep your information safe?

We have implemented appropriate technical and organizational security measures designed to protect the security of any personal information we process. However, please also remember that we cannot guarantee that the internet itself is 100% secure. Although we will do our best to protect your personal information, transmission of personal information to and from our Sites is at your own risk. You should only access the services within a secure environment.

9. Individual Rights

9.1. Right to be informed.

To know how your information will be held and used (this privacy notice)

9.2. Right of access.

You have a right to access the personal data that is held about you. To obtain a copy of the personal information Community TechAid holds about you, please write to us at the following address . We will send you a copy of your profile and the information we have held about you by writing to the following address contact@communitytechaid.org.uk

9.3. Right of rectification

To tell us to make changes to your personal information if it is incorrect or incomplete.

9.4. Right to erasure.

Ability for you to request us to erase any information we hold about you if you ask us not to hold it anymore.

9.5. Right to restrict processing of personal data.

You have the right to request limits on how we use your personal information.

9.6. Right to data portability.

Under certain circumstances you can request a copy of personal information held electronically so you can reuse it in other systems.

9.7. Right to object.

To be able to tell us you don't want them to use certain parts of your information, or only to use it for certain purposes.

9.8. Rights in relation to automated decision making and profiling.

The right to lodge a complaint with the Information Commissioner's Office. To be able to complain to the ICO if you feel your details are not correct, if they are not being used in a way that you have given permission for, or if they are being stored when they don't have to be.

Full details of your rights can be found at

<https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/>

10. Do we make updates to this policy?

We may update this privacy policy from time to time. The updated version will be indicated by an updated "Revised" date and the updated version will be effective as soon as it is accessible. If we make material changes to this privacy policy, we may notify you either by prominently posting a notice of such changes or by directly sending you a notification. We encourage you to review this privacy policy frequently to be informed of how we are protecting your information.