



STREET CHILD PRIVACY POLICY

February 2021

1. INTRODUCTION

Street Child (“we”, “us”, or “our”) is committed to protecting and respecting the personal data that we hold. This privacy statement describes why and how we collect and use personal data and provides information about individuals’ rights. It applies to personal data provided to us, both by individuals themselves or by others. We may use personal data provided to us for the purposes described in this privacy statement or as made clear before collecting personal data.

Personal data is any information relating to an identified or identifiable living person. When collecting and using personal data, our policy will always be transparent about why and how we process personal data.

We process personal data for numerous purposes, and the means of collection, lawful basis of processing, use, disclosure, and retention periods for each purpose are set out in the relevant sections below.

The personal data that is provided to us is provided either directly from the individual concerned, from a third party acting on behalf of an individual, or from publicly available sources.

Where we receive personal data that relates to an individual from a third party, we request that this third party inform the individual of the necessary information regarding the use of their data.

Where necessary, reference may be made to this privacy statement.

2. SECURITY

We take the security of all the data we hold seriously. Relevant employees are trained on data protection, confidentiality and security.

We have a framework of policies and procedures which ensure we regularly review the appropriateness of the measures we have in place to keep the data we hold secure.

All information you provide to us is stored on secure servers.

Unfortunately, the transmission of information via the internet is not completely secure. 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.

3. DATA THAT WE HOLD

3.1 DONORS AND BENEFICIARIES

We hold the personal data of our donors and supporters, whether those are individuals or organisations. We also hold personal data on our beneficiaries to whom we deliver various services. The exact data held will depend on the services provided.

Where we engage with individuals, we may collect and process personal data in order to deliver our services, to process a donation, or to fulfil any other fundraising and/or charitable activity. We request that individuals only provide the personal data that is required for us to fulfil our business operations.

3.1.1 Why do we process data?

Where data is collected for fundraising and/or charitable activities, it is used as follows;

- Providing services to our beneficiaries. Data is processed in accordance with the purpose of which we have collected it, and may sometimes be further clarified in written documentation supplied before any data processing may occur;
- Donor's needs. We process donors' and supporters' personal data in order to complete our fundraising activities, other charitable purposes, promote our events as well as communicate with our donors about our activities. We only process personal data to ensure that our supporters' needs are appropriately met;
- Administration. We may collect and process personal data in order to manage and administer our charitable business and services. This may include (but is not limited to) maintaining internal business records, managing donor relationships, hosting events (fundraising and challenges/competitions), and maintaining internal operating processes.
- Regulatory. In order for Street Child to perform its business, we may from time to time be required to collect and process personal data in order to fulfil regulatory, legal or ethical requirements. This may include (but is not limited to) the verification of identity of individuals.

3.1.2 What data is processed?

The data that is processed is dependent on the service that is being provided and on the recipient of this service.

- **Services to beneficiaries.** Personal data may include contact details, photographs, videos and any other specifically relevant data.

- **Services to donors.** Personal data may include contact details, history of giving, financial information, banking information, interests, relationships, addresses, and other personal data that is relevant to our fundraising and general marketing purposes.

3.1.3 How long do we hold data for?

We retain the personal data processed by us for five years, at this time we will apply to the donor/ supporter for the right to continue to hold their data. It is only held for the purpose(s) for which it was collected. There may be occasions which will require data to be kept for longer, however this will typically be for legal purposes and in these instances it will be made clear to the relevant personnel.

In addition, personal data may be securely archived with restricted access and other appropriate safeguards where there is a need to continue to retain it. We will review this data at five year intervals to ensure that it is still relevant and necessary.

3.2 OUR PEOPLE

We collect personal data from our staff as part of the administration, management and promotion of our business activities. This includes holding the personal data of our general and international volunteers, as well as the personal data of interns, trustees, and other temporary members of staff.

Our staff handbook explains further how personal data is held for our staff.

3.2.1 Applicants

Where an individual is applying to work for Street Child, personal data is collected through the application process.

There are a number of purposes that personal data for applicants are collected.

- **Employment.** We process an applicant's personal data in order to assess their potential employment at Street Child.
- **Administration and management.** We may also use this personal data in order to make informed management decisions and for administration purposes.

Personal data collected for applicants is held for as long as necessary in order to fulfil the purpose for which it was collected, or for a maximum of ten years where those purposes no longer become necessary.

3.3 BUSINESS PARTNERS

We collect and process personal data about our business partners, local partners, suppliers, influencers, sponsors, contractors, and individuals associated with them. The data is held to manage our relationship, to contract and receive services from them, and in some cases to provide services to our beneficiaries, staff, donors or other service users.

3.3.1 Why do we process data?

- Receiving goods and services. We process personal data in relation to our business partners and their staff as necessary to receive the services.
- Providing services to our beneficiaries. Where a business partner is helping us to deliver charitable services to our beneficiaries, we process personal data about the individuals involved in providing the services in order to administer and manage our relationship with the business partner and the relevant individuals and to provide such services to our beneficiaries and other service users such as event attendees, sport challenge competitors and donors.
- Administering, managing and developing our businesses and services. We process personal data in order to run our business, including:
 - Managing our relationship with business partners;
 - Developing our businesses and services (such as identifying beneficiaries, donors and other service users' needs and improvements in service delivery);
 - Maintaining and using IT systems;
 - Hosting or facilitating the hosting of events; and
 - Administering and managing our website and systems and applications.
- Security, quality and risk management activities. We have security measures in place to protect our, and our stakeholders', information (including personal data), which involve detecting, investigating and resolving security threats. Personal data may be processed as part of the security monitoring that we undertake; for example, automated scans to identify harmful emails. We have policies and procedures in place to monitor the quality of our services and manage risks in relation to our suppliers. We collect and hold personal data as part of our supplier contracting procedures. We monitor the services provided for quality purposes, which may involve processing personal data.
- Complying with any requirement of law, regulation or a professional body of which we are a member. We are subject to legal, regulatory and professional obligations. We need to keep certain records to show we comply with those obligations and those records may contain personal data.

3.3.2 What data do we hold?

We will hold business partners' names, contacts numbers, and contact details as well as banking and other financial information.

3.3.3 How long do we hold data for?

We retain the personal data processed by us for five years, at which time it is reviewed, for the purpose for which it was collected (including as required by applicable law or regulation). Data may be held for longer periods where required by law or regulation and in order to establish, exercise or defend our legal rights.

4. PEOPLE WHO USE OUR WEBSITE

When people visit our website, personal data is collected both through automated tracking and interacting with various forms on the website or apps (collectively referred to as the websites).

Personal data may be collected when individuals fill in forms on our websites or by corresponding with us by phone, e-mail or otherwise. This includes information provided when an individual registers to use our websites, subscribes to our newsletter, makes an enquiry or signs up to an event or challenge.

5. SHARING PERSONAL DATA

We will only share personal data with others when we are legally permitted to do so. When we share data with others, we put contractual arrangements and security mechanisms in place to protect the data and to comply with our data protection, confidentiality and security standards.

Personal data held by us may be transferred to:

Third party organisations that provide applications/functionality, data processing or IT services to us.

We use third parties to support us in providing our services and to help provide, run and manage our internal IT systems. For example, providers of information technology, cloud-based software as a service-providers, identity management, website hosting and management, data analysis, data back-up, security and storage services. The servers powering and facilitating that cloud infrastructure are located in secure data centres around the world, and personal data may be stored in any one of them.

Third party organisations that otherwise assist us in providing goods, services or information Law enforcement or regulatory agencies or those required by law or regulations.

Occasionally, we may receive requests from third parties with authority to obtain disclosure of personal data, such as to check that we are complying with applicable law and regulation, to investigate an alleged crime, to establish, exercise or defend legal rights. We will only fulfil requests for personal data where we are permitted to do so in accordance with applicable law or regulation.

6. LOCATIONS OF PROCESSING

Personal data resides within the EU or UK. If it is needed to be transferred to, and/ or stored at, a destination outside the European Economic Area (EEA) the relevant personnel will be informed.

7. INDIVIDUALS' RIGHTS

Individuals have certain rights over their personal data and data controllers are responsible for fulfilling these rights as follows:

- Individuals may request access to their personal data held by us as a data controller.
- Individuals may request us to rectify personal data submitted to us or, where appropriate, contact us via the relevant website registration page or by amending the personal details held on relevant applications with which they registered.
- Individuals may request that we erase their personal data
- Where we process personal data based on consent, individuals may withdraw their consent at any time by contacting us or clicking on the unsubscribe link in an email received from us.
- Individuals may have other rights to restrict or object to our processing of personal data and the right to data portability.
- Individuals may request information about, or human intervention into, any automated data processing that we may undertake.

If you wish to exercise any of these rights, please send an email to info-ch@street-child.org

8. COMPLAINTS

We hope that you won't ever need to, but if you do want to complain about our use of personal data, please send an email with the details of your complaint to info-ch@street-child.org. We will look into and respond to any complaints we receive within 72 hours of receipt.

9. DATA CONTROLLER AND CONTACT INFORMATION

The data controller for Street Child is Amy Ditton. If you have any questions about this privacy statement or how and why we process personal data, please contact us at: info-ch@street-child.org

10. CHANGES TO OUR PRIVACY STATEMENT

Updates to this privacy statement will appear on this website. This privacy statement was last updated on 22/02/2021.