



GDPR Privacy Policy **Global Village Action (GVA)**

Last updated: September 2019

Version: 3.0

Privacy Policy

Global Village Action (“GVA”) is committed to preserving the privacy of its donors, volunteers, beneficiaries and members on our websites, social media accounts, text messages, mobile apps, emails, and other emerging digital interfaces (“platforms”). We will never share or sell your information. This Privacy Policy explains how GVA collects, uses and protects any information you give when you visit our premises and our platforms.

Who are we?

Global Village Action (GVA) is a UK registered charity (no. 1178320) dedicated to working to release, transform, and empower the lives of indigent persons through poverty alleviation and self improvement programmes. We prioritise free skills acquisition, food distribution, and pastoral care and counselling in safe locations in South Bucks, and in outreach locations in West Africa. We have outreach partners and funding partners across the world.

Our registered address: 3rd Floor, 86-90 Paul Street, London EC2A 4NE, England.

When do we collect information from you?

We collect information about you directly from you and from third parties, as well as automatically through your use of our platforms.

Information We Collect Directly From You

We collect information about you when you visit any of our premises to attend an event or conference, to receive training, to serve as a volunteer, or to receive other services. We may also collect personal and special category information directly from you during the course of your interactions with us, for example, when you register for conferences or events, when you make a donation, and when you complete a Gift Aid donor form or fill other forms. We also collect information from you when you provide such information through the use of our platforms.

Information We Collect Automatically

Over time, we may automatically collect the following information about your use of our platforms through cookies and other technologies: your domain name; your browser type and operating system; your connection speed; web pages you view; links you click; your IP address; your device ID; the duration of your visit; the referring URL, or the webpage from which you clicked through to our platform. We may combine this information

with other information that we have collected about you, including, where applicable, full names and your online user name, information about your avatar, and other personal information we hold about you.

Such information about your use of our platforms (e.g. your IP address, operating system, Internet browser, connection speed, and the domain name of your Internet service provider) may be gathered by the following methods: Cookies. A cookie is a small text file that is downloaded onto a device's browser to allow a website to recognise it and to store some information about how you use the site. These small pieces of information are stored by your browser on your computer's hard drive which work by assigning to your computer a unique number that has no meaning outside of our platforms. Cookies are a common feature used on almost all websites to make them work properly and they do not generally contain any personally identifiable information. Most Web browsers automatically accept cookies, but you can usually configure your browser to prevent this. Not accepting cookies may make certain features of our platforms unavailable to you. For full details of how we use cookies and for more information and guidance on how to adjust your cookie setting, please see our **Cookie Policy** ([ONLINE](#))

We use the following types of cookies:

Session Cookies. Session cookies exist only during an online session. They disappear from your computer when you close your browser or turn off your computer. We use session cookies to allow our systems to uniquely identify you during your visit to any of our platforms or while you are logged into a site for long period. This allows us to verify your identity, review and respond to your requests, and process your online transactions as you move through our platforms.

Permanent or Persistent Cookies. Persistent cookies remain on your computer after you have logged off from our platforms, closed your browser or turned off your computer. We use persistent cookies to collect statistical information about user activity. This enables us to improve our services to you.

IP Address. You may visit many areas of our platforms anonymously without the need to log into an account or become a registered user. However, even in such cases, we may collect IP addresses automatically. An IP address is a number that is automatically assigned to your computer whenever you register with or begin to use the services of an Internet service provider. Each time you access our platforms and each time you open a page on any of our Web Beacons. A web beacon is a small piece of data, typically an image of just one pixel that is embedded in emails and web pages and delivered to your device in an HTML email message, in an app, in an advert, or as part of

a web page request. Web beacons are typically used for site performance monitoring and analytics such as site traffic reporting, counting unique visitors, auditing, personalisation, page load speed and advertising. We may use web beacons in messages that we send to you to determine whether you have opened those messages and/or clicked on links in those messages. The information from our use of web beacons may be collected in a form that is personally identifiable information.

- **Device ID and Advertising ID.** Device ID is a unique identifier that can be used to identify a mobile device such as a PDA or a Smartphone. They can typically only be accessed via an app and not from the mobile web. The latest devices also provide a re-configurable advertising ID that allows ad targeting and tracking without relying on an identifier uniquely linked to the device. We may use device ID and advertising ID, as may be required, to collect statistical information about user activity.
- **Tracking Content Usage.** In the course of using our platforms, if you copy and post any text or audio-visual materials including, without limitation, artwork, graphics, video, pictures, logos, or sound (collectively, “Content”) to your own Web site or to a third party Web site, we may automatically track and capture non- personally identifiable information associated with the use of Content. Please see our Intellectual Property Notice at the end of this page.

What type of information is collected from you?

We only collect data that is relevant for the purpose of providing services to you, to our members, to our volunteers, and to our beneficiaries.

Information we collect might include: your name, title, contact address, email address, contact numbers, date of your visit to our premises, date and content of any request, audio-visual files (photographs, videos, graphics, and text collected in the course of services or during events), and information including but not limited to the number of website visits, and resources accessed and downloaded. We do not store your card information if you make a donation online or purchase a product from an online shop linked to any of our platforms or linked to any of our partners or affiliates. This information is collected by third-party payment processors, who specialise in the secure online capture and processing of credit/debit card transactions.

We also collect information in connection with your privacy preferences such as any consent or restriction that you provide in relation to your information and your visit.

How do we collect information from you?

We obtain information about you when you visit any of our premises or any of our platforms, for example when you attend a service or an event, or you contact us for information, visit our website or social media platforms, make a donation, become a member or if you register to receive our newsletters by postal or electronic mail.

How is your information used?

We use the personal information we collect for the purpose disclosed at the time of collection or otherwise as set out in this Privacy Policy. We require this information to understand your needs and to provide you with the support and services that are relevant to you. We will not sell or rent your information to third parties and we will not use your personal information for any other purpose without first seeking your consent, unless authorised or required by law.

We may use your information to:

- Send you communications that you have requested about us, our events, donations, charity news, and how you can support us
- Process donations you have made
- Process requests you have made
- Answer your inquiry by post, telephone, mobile phone, or by email
- Register you for events and conferences
- Establish and maintain contact with you including providing you with regular correspondence or newsletters
- Provide you with access to our platforms
- Communicate with you about your use of our platforms
- Provide other services that are relevant to you such as periodic reminder emails about events, services or other information which we believe may be of interest to you.

In addition, we may use your information in automated technologies as follows:

- **System Administration.** We may use your information for the purposes of system administration, monitoring our system, assisting in diagnosing problems with our servers, performance and traffic on our platforms, and to gather broad demographic information about visitors to our premises and platforms.

- **Personalization.** We use cookies, device IDs, and IP addresses to track features such as delivering content specific to your interests and informing you of new, relevant services or certain third party offerings.
- **Modeling.** We use cookies, device IDs, advertising IDs and IP addresses in machine learning applications to optimize marketing campaigns on our platforms or on the platforms of our partners and affiliates.
- **Analytics.** We use cookies, device IDs, advertising IDs and IP addresses to generate aggregate and statistical metrics.
- **Notices to Registered Users.** If you have registered for an account on any of our platforms, we may use your personally identifiable information to send you e-mails regarding your registration, including confirmation to verify the accuracy of any information you have provided, and instructions on how to participate or make contributions to our newsletters or platforms. We may also send you e-mails to verify your identity or to notify you if we believe your use of our platforms violates any applicable agreement for the use of our platforms.
- **Promotional E-mails.** We may use your personally identifiable information to send you e-mails periodically listing promotions or events relating to our services and activities or from our marketing partners or sponsors. You have the choice to opt-out of receiving such promotional e-mails by simply scrolling down in any such email and clicking on the email's "[SafeUnsubscribe](#)" link. Once we have processed your opt-out request, we will not send you promotional e-mails unless you opt back in to receiving such communications, including through implicit opt-ins when you download our promotional news or other information from our platforms or attend our hosted events.
- **Product and Service Announcement E-mails.** We may use your personally identifiable information to send you e-mails periodically on our new service updates. You have the choice to opt-out of receiving such e-mails by writing to us or sending an e-mail to info@globalvillageaction.com or following the instructions in such correspondence. Once we have processed your opt-out request, we will not send you automated service announcement e-mails unless you opt back in to receiving such communications.
- **Contact Information.** If you contact us by telephone, e-mail or letter, we may keep a record of your contact information and correspondence. If you report a problem with any of our platforms, we may collect this information

in a file specific to you. You may contact us by postal mail or by sending an email to info@globalvillageaction.com to request the removal of this information from our database.

Your preferences

You can choose to receive or not to receive information from us. If you do not wish to receive information from us please send your written request by post or send an email to info@globalvillageaction.com to request the removal of your information from our database. Where applicable, you may also tick the relevant boxes on the Communications Preferences form or subscribe / unsubscribe options in our print and electronic newsletters and mail-shots, respectively. Unless we receive your consent, we will not contact you for event notifications, donations, promotions, or marketing purposes by email, phone or post.

Access to Your Information (User Choice)

You can request access to personal information that we hold about you and you may request to opt-out of using your data to customise information we send to you or share about you. We will provide you with access to your personal information and respond to any related request within 30 working days of receiving your request, unless we are legally obliged to refuse your request.

- **Access or Change your Information.** Upon request, we will update or correct personal information previously collected, but only to the extent that such action will not compromise the privacy or security interests of other users of any of our platforms. Additionally, upon request, we will delete from our database any personal information you do not want us to hold. However, it may be impossible to entirely delete your information without some residual data or metadata being retained due to the manner in which data backups are made and maintained.
- **Opt-Out.** You may opt out of having personalized content served to you. This does not mean that you will not receive general information from us or from other third parties. It simply means that you will not receive information that has been personalised to suit your interests. Opt out here [cookie policy](#)
- **Email Communications.** We may send periodic promotional or informational emails to you. You may opt-out of such communications by following the opt-out instructions contained in the e-mail. If you opt-out of receiving emails or newsletters or recommendations or other information

we think may interest you, we may still send you e-mails about any service requested or received from us and about your interactions with our organisation.

Keeping Your Personal Information Up to Date

We will keep your personal information up to date based on the information you have provided to us. Please contact us if you wish to change personal information that is out of date or inaccurate. We shall take reasonable steps, within the shortest possible time, to correct any of your information which is inaccurate, incomplete or out of date.

How Long Do We Keep Your Personal Information

We will retain your personal information for no longer than is necessary for the purposes for which we collected and processed it, as defined in this privacy policy. Where necessary, we or our partners may retain your personal data 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. We will aim to implement the appropriate technical and organisational measures to safeguard your rights and freedoms in relation to your retained personal information.

How We Share Your Information

We may share your information, including personal information, as follows:

- **Affiliates.** We may disclose the information we collect from you to our affiliates or subsidiaries solely for the purpose of providing services to you; however, if we do so, their use and disclosure of your personally identifiable information will be maintained by such affiliates and subsidiaries in accordance with this privacy policy.
- **Service Providers.** We may disclose the information we collect from you to third party service providers or agents who perform functions on our behalf.
- **Merger.** If we merge with another organisation or if substantially all of our assets are transferred to another organisation, or as part of a liquidation proceeding, we may transfer the information we have collected from you to the other organisation.
- **Legal Process.** We also may disclose the information we collect from you in order to comply with a legal request such as a court order or subpoena.

- **To Protect Us and Others.** We also may disclose the information we collect from you where we believe it is necessary to investigate, prevent, or take action regarding illegal activities, security threats, suspected fraud, violations of our Terms of Service or this Policy, or as evidence in litigation.
- **Aggregate and De-Identified Information.** We may share aggregate or de-identified or pseudonymized information about users with third parties and publicly for marketing, research or similar purposes.

Please note that except as noted above, we will not sell or share your personal information with any third party without your consent.

Safeguarding Your Information

We are committed to ensuring that your personal information is secured. Therefore, we implement adequate technical and organisational measures for data protection by design and by default. This enables us to mitigate the risk of unauthorised access or disclosure of your information.

We protect your personal information using various technologies and safeguards, including Secure Socket Layer (“SSL”), which is an encrypted communication protocol. SSL is a standard format for transmitting secure data from your computer to our local or third party servers. SSL works by using a private key to encrypt data that is transferred over the SSL connection. You will know SSL is being used when you see “https” preceding a Web address, rather than “http.”

Additionally, we restrict employee access to databases containing personal and financial information, we impose confidentiality requirements upon employees who do have access to databases containing personal and financial information, and we make reasonable endeavours to ensure that our subcontractors, affiliates, partners, and third party service providers similarly implement technical and organisational measures for data protection. In order to most efficiently serve you, credit card transactions and billing may be handled by third party financial institutions, which may only use your personal and financial information in connection with the business services they perform for us. All information they receive is via SSL.

Although we use reasonable efforts to safeguard the security of your personal and financial information, transmissions made on or through the Internet are vulnerable to attack and cannot be guaranteed to be secure. In addition, submissions made via e-mail are not protected by SSL technology and are vulnerable to interception during transmission. You

hereby accept that we are not responsible for any intercepted information sent via the Internet, and you agree to hold us harmless and release us from any and all claims arising out of or related to unauthorised and accidental access to, loss of, and disclosure of your personal information or for any intercepted information that causes loss or harm to you in any way.

Special Note Regarding Children Under 13 Years of Age

We do not intentionally collect or maintain any personally identifiable information from natural persons under the age of 16 (“**Minors**”) except with the consent of a parent, guardian or other responsible adult. Where we collect such information, it is restricted to basic information for the purposes of fulfilling the service you have purchased or signed up to on their behalf, protecting the vital interests of the minor (e.g. in an emergency); acting in the legitimate interest of the minor; performing a task in the public interest; performing a legal obligation; or performance of a contract for the benefit of the minor.

In particular, if you are a parent or guardian of a child under 13 (“**Child**” or “**Children**”), and you have provided us with information belonging to a Child, then alongside the Child’s data provided, we may also process limited personal data about you, so we can record your consent to store, process and use this information about the Child to fulfil the service you have purchased or signed up to on their behalf. We may use your contact details to communicate with you about the Child’s use of these products or services.

If you discover your Minor ward or Child has submitted his or her information to us without your consent, you must contact us to either provide your consent or request to have such information deleted from our database by sending an e-mail request to info@globalvillageaction.com together with the e-mail address that was submitted by the Minor. Upon receiving the request, we will use reasonable efforts to delete such information.

Some information on our platforms may not be appropriate for minors. For example, some text or audio-visual content may contain speeches, messages, articles, or videos that are appropriate for adults only. Minors are only authorized by us to access age-appropriate content on our platforms. If we learn that a Minor is using our platforms except as provided in this section, we will require verified parental or guardian consent, in accordance with the GDPR; Children’s Online Privacy Protection Act of 1998 (“**COPPA**”); and other applicable regulations and statutes.

Links to Third Party websites

From time to time, our platforms may contain links to third parties such as affiliate groups, partners and service providers (e.g. Google maps). These links are provided as a convenient way for you to obtain further information only and the content of such third party websites, apps, and social media accounts (“platforms”) is not approved by or the responsibility of our organisation.

These links may allow third parties to collect personally identifiable information and non- personally identifiable information directly from you. Additionally, we may use third parties to provide components of our platforms. In either case, such third parties may have separate privacy policies and data collection practices, independent of us. We: **(a)** have no responsibility or liability for these independent policies or actions; **(b)** are not responsible for the privacy practices or the content of such third party platforms; and **(c)** do not make any warranties or representations about the contents, products or services offered on such third party platforms or the security of any information you provide to them.

Foreign Data Transfers to Non-EU and Non-EEA Countries

We may use third party service providers or suppliers to provide part of our services to you. In some circumstances these providers may be based in countries outside the European Union or the European Economic Area whose laws provide for a different standard of protection for your personal information than that provided under the laws of the European Union and the United Kingdom (Offshore Data Transfers). In such circumstances:

- We will only transfer your personal data to countries that have been deemed by the European Commission (“EC”) to provide an adequate level of protection for personal data. This determination by the EC, through an Adequacy Decision, may be restricted to specific sectors within the relevant country in which case we will restrict our data transfers to specific sectors.
- Where we use service providers or suppliers, we may use specific contracts approved by the European Commission (Standard Contract Clauses or Ad Hoc Contract Clauses) which give personal data the same protection it has in Europe.
- Where we use service providers or suppliers based in the United States of America (“USA”), we may transfer data to them if they are part of the Privacy Shield framework which requires them to provide adequate safeguards for personal data shared between Europe and the US.
- In the absence of an Adequacy Decision or of appropriate safeguards we

will only engage in Offshore Data Transfers if you have explicitly consented to the proposed transfer, after having been informed of the possible risks of such transfers due to the absence of an adequacy decision and appropriate safeguards; or the transfer is necessary for the performance of a contract on your behalf or for the implementation of pre-contractual measures taken at your request; or the transfer is necessary for important reasons of public interest; or the transfer is necessary for the establishment, exercise or defence of legal claims; or the transfer is necessary in order to protect your vital interests or of other persons, where you are physically or legally incapable of giving consent.

Your personal data will not be disclosed to state institutions and authorities except if required by law or other regulation. Before we release data on this basis, we will ensure that the information is being provided to a genuine and properly authorised agency or institution.

If you would like further information about the specific mechanism, used by us when transferring your personal data out of the EU and the EEA please contact: info@globalvillageaction.com

Personal Data – Your Rights

You have the following rights in relation to your personal data that we process:

- Right of access
- Right to rectification
- Right to erasure
- Right to restrict processing
- Right to data portability
- Right to object
- Your rights in relation to automated decision making and profiling.

Access and rectification: You may, at any time, request access to the personal data that we hold which relates to you. This is sometimes referred to as a 'Subject Access Request'. We will provide this information to you free of charge if we determine that we are obliged to provide personal information to you. Please note that this right entitles you to receive a copy of the personal data that we hold about you in order to enable you to check that it is correct and to ensure that we are processing that personal data lawfully. It is not a right that allows you to request personal data about other people, or a right to request specific documents from us that do not relate to your personal data.

Before providing personal information to you, we may ask for proof of identity and other information about your interactions with us to enable us verify your identity and locate your personal information. If the information we hold about you is incorrect, you are entitled to ask us to rectify any inaccuracies in the personal information.

Objection to processing: you have the right to object to us processing your personal information if we are no longer entitled to use.

Erasure: You may also ask us to erase personal data if we are keeping it too long (you may have heard of this right described as the “right to be forgotten”). Please note that we may ask you to verify any new data that you provide to us and may take our own steps to check that the new data you have supplied us with is right. Further, we are not always obliged to erase personal data when asked to do so; if for any reason we believe that we have a good legal reason to continue processing personal data that you ask us to erase we will tell you what that reason is at the time we respond to your request.

Restriction: You may ask us to restrict processing in certain circumstances. In particular, where we process your personal data on the basis of a legitimate interest you are entitled to ask us to stop processing it in that way if you feel that our continuing to do so impacts on your fundamental rights and freedoms or if you feel that those legitimate interests are not valid.

You may also ask us to stop processing your personal data (a) if you dispute the accuracy of that personal data and want us to verify that data’s accuracy; (b) where it has been established that our use of the data is unlawful but you do not want us to erase it; (c) where we no longer need to process your personal data (and would otherwise dispose of it) but you wish for us to continue storing it in order to enable you to establish, exercise or defend legal claims.

Please note that if for any reason we believe that we have a good legal reason to continue processing personal data that you ask us to stop processing, we will tell you what that reason is, either at the time we first respond to your request or after we have had the opportunity to consider and investigate it.

Portability: Where you wish to transfer specific personal data that we hold about you, which is processed by automated means, to a third party you may write to us and ask us to provide it to you in a commonly used

electronic format. The services we provide and the systems that we use are such that we do not envisage this right being relevant to the majority of individuals who use our services and platforms. However, if you wish to transfer your data from us to a third party we are happy to fulfil such requests.

Automated Decision Making / Profiling: You have the right not to be subject to decisions based solely on automated decision making, including profiling, which produces legal effects concerning you or has similar, significant effects on you. You may ask us to use active human intervention or human discretion to review or alter the decision before it is applied.

Changes to our privacy policy

We continually strive to implement new technologies and processes to better protect you, your privacy and your use of our platforms. As a result, we keep our privacy policy under regular review and we may make changes to this privacy policy from time to time. In no event will these changes result in the degradation of any of the methodologies or security measures designed to protect your information from unauthorized access or disclosure as described in this privacy policy.

How to contact us

Please contact us if you have any questions about our privacy policy or information handling practices or about information we hold about you by sending a letter or email to:

Privacy Office: **Global Village Action**
3rd Floor
86-90 Paul Street
London EC2A 4NE
England
Tel: +44 07846 072 305
info@globalvillageaction.com

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Written permission must be obtained from Global village Action before any proprietary material can be used in any manner.

We use technological tools to monitor the internet for violations.