Privacy Policy

This Privacy Policy sets out how we collect, use and store your personal information. Our Privacy Policy may be updated from time to time, this version was last updated on the 24th June 2021. Where we have made any changes to this Privacy Policy, we will make this clear on our website or contact you about any changes.

1. Who we are
KHULA Education is a UK Registered Charity; Number: 1119353 Not-for-Profit Section 21 Company, Registration No: 2007/015903/08 NPO No: 064549 And Public Benefit Organisation No 930026587

Our mission is to enable children from deprived rural communities in South Africa have the opportunity of a well-rounded education in order to improve their own lives and their communities. At any one time around 6,000 children enrolled in our schools depend on us to give them the opportunities that many of us take for granted.

For our charity to continue with our cause we need to raise money. We do this through personalised contact with our existing and new supporters.

For further information about our privacy practices, please contact Hannah Charrington by:
• Calling +44 (0)7861 689819
• Emailing hannah@khula.org.uk

2. How we collect information about you
We collect information about you in order for us to make sure that any communications you receive from KHULA are relevant to you, be it through visiting our website or receiving emails, post or phone calls. We collect this information in the following ways:

**When you interact with us directly:** This could be if you ask us about our activities, make a donation to us or otherwise provide us with your personal information. This includes when you phone us, visit our website, or get in touch through the post, or in person.

**When you interact with us through volunteers or trustees working on our behalf:** This could be if you have expressed an interest in supporting our work.
When you interact with us through third parties: This could be if you provide a donation through a third party such as Just Giving or one of the other third parties that we work with and provide your consent for your personal information to be shared with us.

When you visit our website: We gather general information which might include which pages you visit most often and which services, events or information is of most interest to you. We may also track which pages you visit when you click any links in emails from us.

We use this information to personalise the way our website is presented when you visit to make improvements and to ensure we provide the best service and experience for you. Wherever possible we use anonymous information which does not identify individual visitors to our website.

We also use "cookies" to help our site run effectively. There are more details below – see 'Cookies'.

From information that is available to the public: In addition to the information, you give us, we may add information from publicly available sources including data from, for example, reputable newspapers, Companies House, or LinkedIn/Twitter. We do this to manage our fundraising effectively and to give you the best experience by tailoring our approaches to you according to your interests as well as the level at which you could potentially support us. (we have provided further details about this below – see 'Profiling').

3. Information we collect and why we use it
Personal information we collect includes details such as your name, date of birth, email address, postal address, telephone number and credit/debit card details (if you are making a purchase or donation), as well as the information you provide in any communications between us. You will have given us this information whilst making a donation, registering for an event, or any of the other ways to interact with us.

We will mainly use this information:
- To process your donations or other payments, to claim Gift Aid on your donations and verify any financial transactions.
- To Provide appropriate follow-up and stewardship.
- To update you with important administrative messages about your donation, an event or any other information you have requested.
- To comply with the Charities (Protection and Social Investment) Act 2016 and follow the recommendations of the official regulator of charities, the Charity Commission, which require us to identify and verify the identity of supporters who make major gifts so we can assess any risks associated with accepting their donations.
- To keep a record of your relationship with us.

If you do not provide this information, we will not be able to process your donation, sign you up for a particular event or provide information you have requested.

We may also use your personal information to contact you about our work and how you can support KHULA (see section 8 on 'Marketing' below for further information)
Sensitive Personal Information
We may occasionally collect sensitive personal information; such as married status, where we have established a legitimate interest in doing so such as tailoring our communication to our supporters experiences. (We have provided further details about this below – see our legal basis for using your information). This may be information that is publicly available or that you have shared with us. If you provide us with any Sensitive Personal Information by telephone, email or by other means, we will treat that information with extra care and confidentiality and always in accordance with this Privacy Policy.

4. Profiling
We sometimes use profiling and screening methods so that we can better understand our supporters preferences and needs to provide a better experience for you.

We may carry out targeted fundraising activities using profiling techniques based on the information that we hold about you. We may also use information about you that is publicly available.

This information allows us to use our resources more effectively by better understanding the background of our supporters and making appropriate requests based on what may interest them and their capacity to give.

You can of course opt out of this activity at any time. To do this, email Hannah Charrington at hannah@khula.org.uk or by Calling +44 (0)7861 689819.

5. Legal basis for using your information
The legal basis we use for our processing your personal information is 'legitimate interests'. Whenever we process your Personal Information under the 'legitimate interest' lawful basis we make sure that we take into account your rights and interests and will not process your personal information if we feel that there is an imbalance with your individual interests, rights and freedoms.

Some examples of where we have a legitimate interest to process your Personal information are where we use your personal information for data analytics, conducting research to better understand who our supporters are, or for complying with guidance from the Charity Commission.

6. Marketing
We may contact you about our work or how you can support KHULA by phone, email, mail. You may choose how you would prefer to hear from us and update your choices at any time or you may stop us sending you these communications by contacting Hannah Charrington at hannah@khula.org.uk by calling +44 (0)7861 689819 or clicking the unsubscribe link at the bottom of the relevant communication.
7. Sharing your Information
The personal information we collect about you will only be used by our staff, trustees and volunteers at KHULA.

We will never sell or share your personal information with organisations so that they can contact you for any marketing activities. Nor do we sell any information about your web browsing activity.

KHULA may however share your information with our trusted partners and suppliers who work with us or on our behalf to deliver our services, but processing of this information is always carried out under our instruction. We make sure that they store the data securely, delete it when they no longer need it and never use it for any other purposes. Some examples of where we may share your information are; with our fulfilment partners who help to create and send information to you to reduce our costs and with our partners who help us to process donations and claim Gift Aid.

We enter into contracts with these service providers that require them to comply with Data Protection Laws and ensure that they have appropriate controls in place to secure your information.

Legal disclosure
We may disclose your information if required to do so by law (for example, to comply with applicable laws, regulations, and codes of practice.)

8. Keeping your information safe
We've implemented appropriate physical, technical and organisational measures to protect the personal information we have under our control, both on and off-line, from improper access, use, alteration, destruction, and loss.

Unfortunately, the transmission of information using the internet is not completely secure. Although we do our best to protect your personal information sent to us this way, we cannot guarantee the security of data transmitted to our site.

Any debit or credit card details which we receive on our website are passed securely to World Pay our payment processing partner, according to the Payment Card Industry Security Standards.

9. How long we hold your information
We only keep it as long as is reasonable and necessary for the relevant activity, which may be to fulfil statutory obligations (for example, the collection of Gift Aid).

10. Your rights
You have various rights in respect of the personal information we hold about you – these are set out in more detail below. If you wish to exercise any of these rights or make a complaint, you can do so by contacting Hannah Charrington at hannah@khula.org.uk by calling +44 (0)7861
689819. You can also make a complaint to the data protection supervisory authority, the Information Commissioner's Office, https://ico.org.uk/:

- **Access to your personal information:** You have the right to request access to a copy of the personal information that we hold about you, along with information on what personal information we use, why we use it, who we share it with, how long we keep it for and whether it has been used for any automated decision making. You can make a request for access free of charge. Please make all requests for access in writing, and provide us with evidence of your identity.

- **Right to object:** You can object to our processing of your personal information where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground. You also have the right to object where we are processing your personal information for direct marketing purposes. Please contact us as noted above, providing details of your objection.

- **Consent:** If you have given us your consent to use personal information (for example, for marketing), you can withdraw your consent at any time.

- **Rectification:** You can ask us to change or complete any inaccurate or incomplete personal information held about you.

- **Erasure:** You can ask us to delete your personal information where it is no longer necessary for us to use it, you have withdrawn consent, or where we have no lawful basis for keeping it.

- **Portability:** You can ask us to provide you or a third party with some of the personal information that we hold about you in a structured, commonly used, electronic form, so it can be easily transferred.

- **Restriction:** You can ask us to restrict the personal information we use about you where you have asked for it to be erased or where you have objected to our use of it.

- **No automated decision making:** We do not currently carry out any automated decision-making. You have the right not to be subject to automated decisions that will create legal effects or have a similar significant impact on you, unless you have given us your consent, it is necessary for a contract between you and us or is otherwise permitted by law. You also have certain rights to challenge decisions made about you. Automated decision-making takes place when an electronic system uses personal information to decide without human intervention.

### 11. Cookies

'Cookie' is a name for a small file, usually of letters and numbers, which is downloaded onto your device, like your computer, mobile phone or tablet when you visit a website. They let websites recognise your device, so that the sites can work more effectively, and also gather information about how you use the site. A cookie, by itself, can't be used to identify you.

**How do we use cookies?**

We use cookies to distinguish you from other users of our website. This helps us to provide you with a good experience when you come to our website and also allows us to improve the user experience.
The cookies we use
We use the categorisation set out by the International Chamber of Commerce in their UK Cookie Guide. We only use the following categories of cookies:

- Strictly necessary cookies are essential for you to move around our website and to use its features, like our shopping basket and your account.
- Performance cookies collect anonymous information about how you use our site, such as which pages are visited most.

No cookies, please
You can opt out of all our cookies (except the strictly necessary ones). Find out how to control and delete cookies in your browser. But, if you choose to refuse all cookies, our website may not function for you as we would like it to. If you have any questions about how we use cookies, please contact us.