

# **The Umbrella Foundation**

## **Data Protection & Privacy Statement May 2018**

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## Section 1: Introduction & Rationale

The Umbrella Foundation is committed to safeguarding your privacy online. The purpose of this document is to provide a concise policy statement regarding the Data Protection obligations of The Umbrella Foundation. This includes obligations in dealing with Personal and Sensitive Personal Data, in order to ensure that The Umbrella Foundation complies with the requirements of the relevant Irish Data Protection legislation.

This statement explains how we will collect, use and disclose information.

It is important that you feel completely comfortable and confident that your personal information is in safe hands. The Umbrella Foundation takes protecting your privacy extremely seriously and takes all reasonable steps to ensure your information is secure.

The use of your personal information, why we collect it and what we save varies depending on how you interact with The Umbrella Foundation, what consent you have given us and what the situation is. We have done our best to indicate this throughout the statement.

The policy covers both Personal and Sensitive Personal Data held in relation to Data Subjects by The Umbrella Foundation. The policy applies equally to Personal Data held in manual and automated form. All Personal and Sensitive Personal Data will be treated with equal care by The Umbrella Foundation. Both categories will be equally referred to as Personal Data in this policy, unless specifically stated otherwise.

## Section 2: Key Principals

- The Umbrella Foundation ensures that all data shall be obtained and processed fairly and lawfully
- The Data Subject will, at the time the data is being collected, be made aware of the purpose(s) for which the data is being collected (which are specific, lawful and clearly stated), the person(s) to whom the data may be disclosed by the Data Controller and any other information that is necessary so that the processing is fair
- Processing of the Personal Data will be carried out only as part of The Umbrella Foundation's lawful activities, and The Umbrella Foundation will safeguard the rights and freedoms of the Data Subject
- The Umbrella Foundation ensures that all data shall not be further processed in a manner incompatible with the specified purpose(s)
- The Data Subject's data will not be disclosed to a third party other than to a party contracted to The Umbrella Foundation and operating on its behalf, as per [Section 6](#) below
- The Umbrella Foundation ensures that all data shall be kept safe and secure
- The Umbrella Foundation ensures that all data shall not be kept for longer than is necessary to satisfy the specified purpose(s)
- The Umbrella Foundation will respond to written Subject Access Requests (seeking a copy of their Personal Data) within the timelines stipulated in the legislation

### **Section 3: What Information We Collect**

The Umbrella Foundation acquires, processes and stores Personal Data. The Umbrella Foundation may collect a variety of personally identifiable or sensitive information from Data Subjects for various reasons. For example:

- Personal details you give us, such as your name, email, phone number and address. We save this so we can keep in touch with you as appropriate, e.g. through newsletters or direct emails
- Your financial details, if you have made a donation to The Umbrella Foundation. We need this to process your donation including accessing your tax back on your donation if appropriate

We would like to use the personal details you provide us to communicate with you about what is going on in The Umbrella Foundation. We may also let you know about other ways you could get involved - whether that's through, fundraising, events, volunteering such as our NGO Support Placement.

When you give us your details we will always tell you what we are going to do with them. If we request your contact details for any reason, you will always have an option to not give us them or to opt out. It is always your choice and you can change your mind at any time by contacting us.

### **Section 4: Where We Collect Information From**

Examples may include:

- From you directly, for example, when you fill out a mailing list application, volunteer application, or become a sponsor or donor
- From external sources, for example, when you create an iDonate/Everyday Hero page or when you interact with us on social media
- From other organisations, when you give permission or where your personal data is available publicly. For example, if you work for a volunteer sending organisation or another NGO / social justice organisation

### **Section 5: How Long We Keep Information**

We keep personal information for different lengths of time dependent on the purpose. For example, for the purpose of our newsletter mailing list, we keep the Data Subjects name and email address only when the Data Subject has opted-in and for a period until they opt-out. Donor details are kept for a period of 2 years if inactive, otherwise indefinitely until the active donor opts-out.

You can contact us at any time to ask us to see, amend or remove any of your personal information that we are holding.

## **Section 6: Who We Share Personal Information With**

Your information will be kept confidential to The Umbrella Foundation, we never provide or sell your personal details with third parties for the purpose of marketing. The only exception to this would be where there was a lawful reason for your information to be provided to the police, regulatory bodies or legal advisers.

The Umbrella Foundation engages one Data Processor to process Personal Data on its behalf. For this, a formal, written contract is in place with the Processor, outlining their obligations in relation to the Personal Data, the specific purpose or purposes for which they are engaged, and the understanding that they will process the data in compliance with the Irish Data Protection legislation.

Our current Data Processors include:

- Mail Chimp

The European Commission states that Model Contracts offer sufficient safeguards on data protection for any data to be transferred internationally. More specifically, these standard contractual clauses are used for data transfers from Data Controllers in the EU to Data Controllers established outside the EU or European Economic Area (EEA). Any international data transfers by The Umbrella Foundation use Model Contracts. For The Umbrella Foundation, this is in relation to any Personal Data transferred from Ireland to Nepal or vice versa.

We are committed to comply with the standards set by the GDPR and this privacy statement at a minimum.

## **Section 7: How Information Is Secured**

The security of your information is of utmost importance to us. We seek to use reasonable measures to protect your information as required by the law and in accordance with the policies. Sensitive Data (known under GDPR as Special Categories of Data) is held under strict security conditions.

## **Section 8: Further Information**

Further information on the law and how your personal information can be used can be found [here](#). You can also contact the [Data Protection Commissioner's Office](#) to find out more about types of personal information, its usage and your rights, or to report a concern.

## **Section 9: Managing Your Communications From Us**

You have the right to know what personal information we have about you, to make changes to how you hear from us, and to ask us to stop processing or to remove your personal information. You also have the right to ask for a copy of the information we have.

Any written request by a Data Subject for a copy of their Personal Data (a Subject Access Request) will be processed as soon as possible and within 21 days, as per data protection legislation.

You can change your communication preferences at any time by contacting us.

## **Section 10: Definitions**

The following definitions will apply within this Policy:

<b>Data</b>	This includes both automated and manual data
<b>Automated data</b>	Data held on computer, or stored with the intention that it is processed on computer
<b>Manual data</b>	Data that is processed as part of a relevant filing system, or which is stored with the intention that it forms part of a relevant filing system
<b>Personal Data</b>	Information which relates to a living individual, who can be identified either directly from that data, or indirectly in conjunction with other data which is likely to come into the legitimate possession of the Data Controller
<b>Sensitive Personal Data</b>	A particular category of Personal data, relating to: Racial or Ethnic Origin, Political Opinions, Religious, Ideological or Philosophical beliefs, Trade Union membership, Information relating to mental or physical health, information in relation to one's Sexual Orientation, information in relation to commission of a crime and information relating to conviction for a criminal offence
<b>Data Controller</b>	A person or entity who, either alone or with others, controls the content and use of Personal Data by determining the purposes and means by which that Personal Data is processed
<b>Data Subject</b>	A living individual who is the subject of the Personal Data, i.e. to whom the data relates either directly or indirectly
<b>Data Processor</b>	A person or entity who processes Personal Data on behalf of a Data Controller on the basis of a formal, written contract, but who is not an employee of the Data Controller, processing such Data in the course of his/her employment

## **Section 11: Contact Us**

PO Box No. 23716  
The Umbrella Foundation  
Kim Dole Choke,  
Swoyambhu-15,  
Kathmandu,  
Nepal  
+977 1 4670932 (Main Office)

[info@umbrellanepal.org](mailto:info@umbrellanepal.org)  
[irishoffice@umbrellanepal.org](mailto:irishoffice@umbrellanepal.org)

Company Registration No. 398495