

Chernobyl Children's Lifeline

GDPR - Data Protection, Privacy and Communications Policy

Throughout this document We/Us/Our refers to Chernobyl Children's Lifeline.

Chernobyl Children's Lifeline is a registered charity and our registration number is 1014274 in England and Wales and SC040136 in Scotland. Our Head Office address is 6 Hartley Business Park, Selborne Road, Alton, Hampshire, GU34 3HD.

We take the privacy of our beneficiaries, supporters and volunteers very seriously. We are strongly committed to protecting your privacy and every reasonable effort is taken to ensure that your information is kept secure and intact. This policy describes how we collect and use personal information about the people who visit our websites and give us their data over the phone, face-to-face, and in writing. This policy also states how and why we use data, how we store it and how individual personal preferences can be amended.

The terms of this policy may change, so please check it from time to time. This version published on 25th May 2018, supersedes all previous versions.

By using our website, you are accepting and consenting to the practices described in this policy. If you have any queries about this policy please contact:

The Chief Executive Officer
Chernobyl Children's Lifeline
6 Hartley Business Park
Selborne Road
Alton
Hampshire
GU34 3HD
E-Mail: ceo@ccll.org.uk

As a not-for-profit organisation we meet the criteria for not having to register with the Office of the Information Commissioner.

Chernobyl Children's Lifeline Privacy Statement

General Data Protection Regulation (GDPR) provides the legal framework that defines how personal information can be used. We are fully committed to complying with the principles set out in GDPR and have a legal duty to protect any information we collect from you. Please read this privacy policy to understand how we use your data. In summary:

- Your personal information is only used for the purpose for which we collect it.
- Only information that we need is collected and will be held for a maximum of 120 months if we do not hear from you during this time.

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- Your personal information is only seen by those who need it to do their jobs.
- We will only disclose data when we have your consent, or where we are obliged to disclose personal data by law, or as expressly permitted under the GDPR (through contract; legal obligation, vital interests; public task; or legitimate interests).
- We will keep your information up to date. Inaccurate or misleading data will be corrected as soon as possible.
- Personal information is retained only for as long as it is required for the purpose collected.
- Your information will be protected from unauthorised or accidental disclosure and processed in an appropriate manner to maintain its integrity and confidentiality.
- We will provide you with a copy of your personal information on request (please see below for information on access rights and requests).

These principles apply whether we hold your information on paper or in electronic form.

How do we collect information?

If you provide services to us, we will collect information in line with your contract for services.

We may also collect technical information relating to your use of our website, including your browser type or the Internet Protocol (IP) address used to connect your computer to the internet.

We also gather general information about the use of our website, such as which pages users visit most often and which services, events or facilities are of most interest. We may also track which pages users visit when they click on links in emails.

We obtain personal information from you when you enquire about our activities - including fundraising and volunteering - register with us, send or receive an email, make a donation to us, ask a question or otherwise provide us with personal information. We may also receive information about you from third parties, for example from mailing list brokers.

We will only ever collect the information that we need, including data that will be useful to help improve our services. The information is either needed to fulfil your

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request or to enable us to provide you with a more personalised service. You don't have to disclose any of this information to browse our sites.

What information do we collect?

The personal information we collect might include name, date of birth, email address, postal address, telephone number and credit/debit card details.

We collect special categories of personal data only if we are permitted to do so by data protection law, and we have additional measures in place to protect this data.

We also gather general non-personal information about the use of our website, such as which pages users visit most often, and which are of most interest. Wherever possible we use aggregated or anonymous information which does not identify individual visitors to our website. Please see the section below on Cookies.

Why do we collect this information?

We collect this information for the purpose of promoting the aims of the Charity and communicating effectively and appropriately with our supporters and, in particular, providing support to our beneficiaries. The lawful basis for which we process your information is:

- your consent;
- processing is necessary for the performance of a contract to which you are a party. If you fail to provide this information we may be unable to perform the contract;
- processing is necessary for compliance with our legal obligations, for example to comply with our obligations as an employer to disclose employee salary details to HMRC;
- processing is necessary to protect your interests or that of another person;
- processing is necessary for the performance of a task carried out in the public interest;
- processing is necessary for the purpose of the legitimate interest pursued by us or a third party, except where your rights as a data subject override our legitimate interest. The legitimate interest we rely upon is subject to an assessment based on the specific context and circumstances.

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How do we use this information?

We will use the information you provide in the ways set out below:

- promote the aims of the Charity;
- to communicate with our supporters, dealing with your enquiries and requests, recording any contact with you;
- to provide you with information that you have indicated an interest in, for example information about our campaigns, volunteering and fundraising and how you can donate to us;
- we may use this information to personalise the way our website is presented when users visit it, to make improvements to our website and to ensure we provide the best service for users;
- to claim Gift Aid on your donations;
- for administrative purposes.

If you enter your contact details in one of our online forms, we may use this information to contact you even if you don't "send" or "submit" the form. We will only do this to see if we can help with any problems you might be experiencing with the form or with our websites.

Do we share your information with anybody else?

We share your personal information with the United Kingdom Visa and Immigration Department as well as our representatives in Belarus and Ukraine, who we engage to select the children on our behalf. In such cases information is only shared for the purpose of providing selection and allocation of children. Such processing is conducted under relevant Data Processing Agreements.

We also may need to disclose your information if required to do so by law or as expressly permitted under applicable data protection legislation.

We do not sell personal details to other charities or other third parties.

Our websites may include links to websites run by other organisations. We are not responsible for the privacy practices of these other websites so you should read their privacy policies carefully before sharing any personal or financial data.

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Storing and protecting your information

We recognise the concerns that many people have about giving personal information online.

We place great importance on the security of all personally identifiable information associated with our supporters, staff and volunteers. We have security measures in place to protect against the loss, misuse and alteration or destruction of personal data under our control. Information is stored by us on computers located in the UK. We may also store information on paper files. All of our online forms are protected by encryption.

However, no data transmission over the internet is 100% secure. As a result, whilst we cannot absolutely guarantee that loss, misuse or alteration of data will not occur while it is under our control, we use our best efforts to prevent this and protect your personal information. The Charity uses a set of controls to provide protection from the most prevalent cyber security threats.

We will keep your information only for as long as we need it to provide you with the services or information you have required, to administer your relationship with us, to inform our research or the preferences of our supporters, to comply with the law and tax accounting rules, or to ensure that we do not communicate with people who have asked us not to.

When your information is no longer required, we will always dispose of it securely, in accordance with our [Retention of Records Policy](#).

Transfer of Information Outside of the EU

Given the work of our Charity necessarily involves the transmission of personal data on an international basis. This means, for instance, that data you pass to us will be transferred outside the European Economic Area, although the data will always be held securely and we will take steps to ensure that any third-party organisation we engage to process data on our behalf provides an adequate level of protection in accordance with GDPR. By submitting your personal information, you agree to this transfer, storing or processing at a location outside the EEA.

Your Rights

You have a right to object to us processing your personal information ('right to object') at any time where we rely on our legitimate interests for doing so. Such a request must be sent to the CEO at the above address.

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You have a right to ask us to confirm whether we are processing information about you, and to request access to this information ('right of access'). You must provide proof of your identity before we can act upon your request. To obtain a copy of the personal information we hold about you, please write to us at our Head Office address or send an email to ceo@ccll.org.uk

You may ask us, or we may ask you, to rectify information you or we think is inaccurate, and you may also ask us to remove information which is inaccurate or complete information which is incomplete ('right to rectification'). If you inform us that your personal data is inaccurate, we will inform relevant third parties with whom we have shared your data so they may update their own records. If your personal details change, please help us to keep your information up to date by notifying us at our Head Office address or send an email to ceo@ccll.org.uk

You have a right to obtain your personal data from us and reuse it for your own purposes, perhaps for another service, without hindering the usability of the data ('right of portability'). This right does not apply where processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in us.

You have a right to seek the erasure of your data (often referred to as the 'right to be forgotten'). You may wish to exercise this right for any reason, for example where it is no longer necessary for us to continue holding or processing your personal data you may withdraw your consent. You should note that we are entitled to and reserve the right to retain your data for statistical purposes. This right is not absolute, as we may need to continue processing this information, for example, to comply with our legal obligations, or for reasons of public interest.

You have a right to ask us to restrict our processing of your information ('right to restriction') if:

- you contest its accuracy and we need to verify whether it is accurate
- the processing is unlawful and you ask us to restrict use of it instead of erasing it
- we no longer need the information for the purpose of processing, but you need it to establish or defend legal claims
- you have objected to processing of your information being necessary for the performance of a task carried out in the public interest, or for the purposes of our legitimate interests. The restriction would apply while we carry out a balancing act between your rights and our legitimate interests.

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- you exercise your right to restrict processing, we would still need to process your information for the purpose of exercising or defending legal claims, protecting the rights of another person or for public interest reasons.

If you would like to exercise any of your rights above, please contact the CEO at our address, unless we have provided specific contact details in respect of one of the rights we have set out. We will act in accordance with your instructions as soon as reasonably possible and there will be no charge.

You have a right to report any of your concerns about our use of your data to the Information Commissioner's Office. You may do so by calling their helpline at 0303 123 1113.

Cookie Usage

Chernobyl Children's Lifeline website uses session cookies which expire. They do not track personal information but are used only to control navigation and security access to the site. This information is never passed to any external body.

Most browsers will allow you to turn off cookies. Please note however that turning off cookies will restrict your use of our website. To learn more about cookies and how to manage them, visit AboutCookies.org.

Trademarks and copyright

Our website contains material which is protected by copyright and/or other intellectual property rights. All copyright and intellectual property rights including the names, images and logos are owned by us unless otherwise stated. All rights are reserved.

You are responsible for complying with all applicable copyright laws. We permit you to make copies of information on our website as necessary incidental acts during your viewing and you may take a print for your personal use of so much of the site as is reasonable for private purposes. All other uses are prohibited. Nothing in these terms shall be construed as conferring any right to use any trademark, logo, patent right or copyright of Chernobyl Children's Lifeline.

Changes

We may change the terms of this privacy statement on occasion, but will not reduce your rights under this Privacy Policy without your explicit consent. If we do so, we will post the changes here, so please check from time to time. We will also

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keep prior versions of this Privacy Policy in an archive. By continuing to use our websites you will be deemed to have accepted such changes.

If you have any questions about this policy or how we use data please contact the CEO at the above address or via email to ceo@ccll.org.uk

Data Protection Regulator

Further information and advice about data protection is available from:

The Office of the Information Commissioner
Wycliffe House
Water Lane
Wilmslow
Cheshire SK9 5AF
Tel: +44 (0) 01625 545 745

Website: www.ico.org.uk