

# Together We Learn Privacy Notice



## Who we are

Together We Learn is a registered charity in England and Wales (number 1165953). Our registered office is 225-229 Seven Sisters Road, London, N4 2DA.

This policy sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us. Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it.

For the purpose of the General Data Protection Regulations 2018, the data controller is Link Ethiopia. Within the context of this privacy policy, 'we', 'us', 'our' or 'TWL' refers to Together We Learn.

Together We Learn is committed to ensuring that your privacy is protected. Any personal data collected by us will only be processed in accordance with this privacy policy.

## Information we collect

Personal information is collected directly from you when you interact with TWL, for example making a donation, purchasing a gift, sending or receiving an email, making an enquiry, visiting our website, applying for a role with us, participating in an event or when signing up to a campaign or for our newsletter. Information may be collected in person, over the phone, through our websites, third party websites such as Virgin Money Giving, social media or from something you've posted to us.

Together We Learn only collects data necessary for pursuing our stated charitable objectives, such as maintaining supporter lists, claiming gift aid, keeping our supporters informed of our activities, marketing, fundraising (including by selling merchandise) and the effective running of the charity through its professional staff, trustees and volunteers.

The information we hold will typically include some of, or all of, your name, postal and email addresses, your phone number, and may include information like your date of birth and your donation details if you are supporting us financially.

## How we use personal data

### Sponsors and Donors

When you make a donation or sponsorship payment to Together We Learn, we will use your payment and contact details, payment amount, date and time of payment; to process that payment and take any follow-up administrative action needed (for example, sending a receipt).

### Financial Records

If you choose to include Gift Aid with a donation to us, then we will also ask for your address and UK taxpayer status as this information is required by law. This information is needed for us to fulfil our obligations under tax (sections 413 to 430 Income Tax Act 2007) and charity law. Information associated with Gift Aid declarations must be retained for 6 years. This information will be shared with HMRC for tax regulation purposes and may also be shared with the Fundraising Regulator and the Charity Commission in the event of their monitoring checks.

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All accounting records must be stored for 6 years according to charity law.

### Mailing Updates

We will only contact you by email for marketing purposes if you are a sponsor or give your consent for us to do so. We may send you marketing by post, on the basis of it being within our legitimate interests to do so, and will always provide you with the option to opt out. We will never share or sell your personal data to a third-party organisation for its campaigning, marketing or fundraising purposes.

We send the following supporter marketing email communications from time to time:

- Occasional updates about TWL's work;
- Information about our campaigning activities and fundraising appeals;
- Seasonal updates about shop products, for example Christmas cards and other merchandise.

You can withdraw your consent, unsubscribe, or update your marketing preferences at any point, see the 'My Rights' section below.

If you are subscribed to our email updates via multiple email accounts and unsubscribe from one email address, we will update your preferences for that email address only. You can unsubscribe from email updates to all addresses by unsubscribing from each of your accounts or by contacting us directly via the details in the 'Contact Us' page on our website.

### Administrative Communications

In addition to the supporter communications that you receive, we may also communicate with you by post, telephone, and email to deal with any administrative matters. Even if you opt out of mailing list communications from us, we may still need to communicate with you occasionally for administrative purposes. For example, we may contact you when you set up or cancel a Direct Debit to confirm your details. We may also need to contact you if there is a problem with a payment or in relation to your Gift Aid declaration. If you sign up to a challenge event, we may contact you to provide all the information you need and to ask for details of your fundraising pages.

### Web Users

Together We Learn uses analytics, which collects information about your computer, such as IP address, operating system and browser type. This does not identify any individual user, and is used to help us improve our services for you. We collect this information via cookies.

Cookies are small text files that websites save locally to your computer, which allow sites to store and use information during your visit. They can improve your experience when using a website by:

- Remembering preferences, so you don't have to keep re-entering your choices when you visit again
- Measuring how you use a site, so that changes can be made to ensure it meets your needs

None of our cookies used for our site can be used to identify you personally. They are just used to help make the site better for you. To learn more about cookies and how to manage them, visit <http://aboutcookies.org/>.

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Our website is hosted by flywheel which is based in the US and is compliant with the EU privacy shield.

## Volunteer and Job Applicants

Your CV, covering letter and application form for any position with Together We Learn will be used during the recruitment process to short-list suitable candidates who will be invited to proceed to the interview stage, and to select the final candidate that the role will be offered to.

We sometimes use third-party job application platforms to publish and receive applications for roles at Together We Learn. When you apply through these portals the organisation's privacy information will be available to you.

If your application is successful, this information will then form part of your personnel file. Where we need to share your data, for example to gather references, you will be informed beforehand unless the disclosure is required by law.

Unsuccessful applicants can ask for us to remove your data if you do not want us to hold it. See 'Your Rights' section below.

## Our legal basis for processing your personal data

When you sign up to a newsletter or opt-in to our communications using our forms (eg. a donation form or online form) or in person, then you are giving us your consent to send you communications by the methods you have chosen (e.g. email or phone call). We will never send you marketing by email or SMS without your consent, and you can withdraw your consent at any time.

If you have provided us with your postal or telephone contact details, but haven't specifically opted-in to receive our communications (for example, making a donation by post), then we will carry out an assessment of whether it would be fair and reasonable to use them to send marketing and fundraising information to you without your explicit consent (i.e. it is in the interests of our aims as a charity and will not cause undue prejudice to you). This is called a "legitimate interests assessment". You can opt out of our marketing and fundraising communications at any time if you don't want to receive them.

We will ensure we have a legal basis to use your personal information for the other purposes mentioned in this policy (usually with your consent, further to a legitimate interests assessment, or because the use of your data is necessary to comply with a legal obligation).

## Who we share personal data with and why

We promise to make all reasonable efforts to keep your details secure and will only share them if the transfer is to a secure data processor, which carries out data processing operations on our behalf.

Instances when TWL may share your data would include delivering postal mail (Royal Mail), sending bulk emails (MailerLite) and processing credit card payments (Paypal). These third party services enable us share our updates with you and enable you to support our work.

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Together We Learn will never share your details for marketing, fundraising or campaigning purposes.

## How we keep your data secure

Together We Learn takes the care of your information seriously we use appropriate technical and organisational measures and precautions to protect your personal data and to prevent the loss, misuse or alteration of your personal data. For example, we use trusted third-party suppliers to provide secure pages for financial transactions taking place on our website, meaning that your details are safe when you buy products from our shop or give a donation.

The data that we collect from you may be transferred to, and stored at, a destination outside the European Economic Area (“EEA”). We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this privacy policy.

We encourage you to review the privacy statements of websites you choose to link to from the Together We Learn website, so that you can understand how those sites collect, use and share your information.

We operate a policy of restricted, password controlled, access to any of your information which is stored on our systems.

## Children’s data

While we do not actively collect information from children (under 18s) in the UK, we appreciate that our supporters are of all ages. Where appropriate, we will always ask for consent from a parent or guardian to collect information about children.

## How long we keep your data

The length of time we keep your data may depend on the reasons we are processing it, on the law or regulations that the information falls under, such as financial regulations, Limitations Act, Health and Safety regulations, or on any contractual obligation we might have, such as with government contracts.

Once the retention period has expired, we will confidentially dispose of or permanently delete your information.

If you ask not to be contacted by us, we will keep some basic information about you on our suppression list to avoid sending you unwanted materials in the future.

## Your rights to your personal information

You have a right to request a copy of the personal information we hold about you, and to have any inaccuracies corrected. You also have the right to request that we delete your personal information, restrict our processing of your personal information or to object to our processing of your personal information.

Where you have provided your consent for us to use your personal information, you always have a right to withdraw your consent at any time.

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To request a copy of all of the information related to you that we are processing use the 'Contact us' section on our website. We may need you to prove your identity with two pieces of approved identification to do this. We reserve the right to charge a fee of £10 for this process.

If your information is incorrect, out of date or if there is no longer justification for us to hold it, you can ask for it to be updated, removed or blocked from our use using the 'Contact Us' section of the website.

If you believe that your personal data has been mishandled by Together We Learn, you have the right to make a complaint to the Information Commissioner's Office (ICO).

You can find out more about your data protection rights on the Information Commissioner's Office (ICO) website [here](#).

## Contact us

Together We Learn's website address is <http://www.twlethiopia.org> our address is 225-229 Seven Sisters Road, London N4 2DA.

You can contact us on our website using the 'Contact Us' page or directly by emailing [hello@twlethiopia.org](mailto:hello@twlethiopia.org)

This policy was updated in September 2020.