# **Privacy Policy**

The Harwich Kindertransport Memorial and Learning Appeal ('the Appeal') is an appeal to raise funds for a permanent memorial to the Kindertransport children who came through Harwich in 1938 and 1939 in search of refuge. Full details of the appeal and our objectives are set out on the website.

This privacy policy explains when and why we collect personal information about people who visit our website or who may contact us, how we use the information, the conditions under which we may share it and about your rights. By using our website you are agreeing to be bound by this policy.

### 1 The type of personal information we collect

The kind of personal information we process may include the following:

- Name
- Postal address
- IP address
- Email address
- Telephone numbers for work and home
- Any other details you have provided directly to us in connection with your donation.

## 2 How we get the personal information and why we have it

Most of the personal information we obtain is provided directly by you, for example, when you use our website, make a donation, contact us by email or register for our email newsletter.

We may also receive personal information indirectly from the following sources in the following scenarios:

- From Just Giving in connection with donations made through their website.
- From Prism the Gift Fund ('Prism') who are our Charity partners and who process donations made through their website.

Prism and Just Giving will each have information relating to your payment method. Any card or payment information is held by Prism or Just Giving (but not by us) in a secure manner in order to process your donation. Details of how they process your information can be found on the Prism and Just Giving websites.

Prism and Just Giving will provide us with information as to whether you are a UK taxpayer for the purpose of claiming Gift Aid.

- From any Social media sites where you tag us or our Appeal such as on Instagram, Facebook or Twitter.
- From Wordpress (who host our site) and where users may subscribe for updates.
- From third party sites such as Eventbrite in connection with any event we may organise. Any card or payment information would in this case be held by Eventbrite in a secure manner in order to process your payment and not by us.
- From publicly available information such as the Charity Commission, Companies House, websites or Google or other search engines to enable us to understand the full picture relating to someone's support or interest in our Appeal.

We may use the information that you have given us to:

- process your donation
- send you communications which you have requested, and which may be of interest to you such as news and updates about our Appeal and related matters
- keep a record of your relationship with us
- · seek your views or comments
- notify you of any developments to our Appeal
- check donations for the purposes of prevention of fraud or other crime
- process grant and trust applications
- invite you to events related to the Appeal.

#### 3 Who has access to your information?

We do not sell or rent your information to third parties.

We do not share your information with third parties for marketing purposes.

We may share your information with our team members for the purposes of fulfilling our purposes in connection with our Appeal.

We may share this information with third parties in order to achieve the other purposes set out in this policy. This may include third party suppliers, agents, subcontractors and other associated organisations for the purpose of completing tasks and providing services to you on our behalf (for example to process donations). However, when we use third parties, we only disclose the information which is necessary for the delivery of the services and we have an agreement with them which requires them to keep your information secure and in accordance with data protection laws.

Where we have provided links to other websites, we are not responsible for the privacy policies and practices of those third-party sites and you should consult the privacy policy of the other website directly.

Under data protection legislation, the lawful bases we rely on for processing this information are:

#### (a) Your specific consent.

We would like to keep you updated with our latest news and details of our Appeal. You have a choice about whether you wish to receive this information from us and you are able to remove your consent at any time. You can do this by contacting:

info@kindertransport-memorial.org

Or write to us:

Prism the Gift Fund For the attention of Alexandra Ballinger 20 Gloucester Place London W1U 8HA

Where you have specifically provided consent to us, it is to use your personal information to send you an email, text, newsletter or update, invitation or telephone contact.

#### (b) We have a legitimate interest.

This is where it is reasonably necessary to achieve our legitimate interest, which is to raise funds and process donations to reach our Appeal target for the purpose of the Appeal. This includes the purposes for contacting you and processing your information as set out in this policy.

We will do this provided the information used is fair and does not unduly impact your rights.

## 4 How we store your personal information

Non sensitive information (e.g. your email address) may be transmitted over the internet but this cannot be guaranteed to be 100% secure. While we will aim to keep your information safe, we can not guarantee the security of any information you have sent to us over the internet and this is sent at your own risk.

Once we receive information, it is kept password protected. We use Wordpress to host our site and users are referred to their site for details of their privacy policy.

We keep personal information for the period of our appeal until successful establishment of the memorial and thereafter for 1 year. Information relevant to our financial accounts will be kept for 6 years or as HMRC may lawfully require from time to time. We may also be required to keep information relating to gift aid for a specified period.

We will then dispose of your information by deleting information about you which is held by us.

#### 5 Your data protection rights

Under data protection law, you have rights including:

**Your right of access** - You have the right to ask us for copies of your personal information.

**Your right to rectification** - You have the right to ask us to rectify personal information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete.

**Your right to erasure** - You have the right to ask us to erase your personal information in certain circumstances.

**Your right to restriction of processing** - You have the right to ask us to restrict the processing of your personal information in certain circumstances.

**Your right to object to processing** - You have the right to object to the processing of your personal information in certain circumstances.

**Your right to data portability** - You have the right to ask that we transfer the personal information you gave us to another organisation, or to you, in certain circumstances.

You are not required to pay any charge for exercising your rights. If you make a request, we have one month to respond to you.

Please contact us at the details below if you wish to make a request:

info@kindertransport-memorial.org

Or write to us:

Prism the Gift Fund For the attention of Alexandra Ballinger 20 Gloucester Place London W1U 8HA

#### 6 Our contact details

E-mail: info@kindertransport-memorial.org

Address: Windsor House, 103 Whitehall Road, Colchester, CO2 8HA

Phone Number: [?]

www.kindertransport-memorial.org

### 7 How to complain

If you have any concerns about our use of your personal information, you can make a complaint to us at:

info@kindertransport-memorial.org

Or write to us:

Prism the Gift Fund For the attention of Alexandra Ballinger 20 Gloucester Place London W1U 8HA

You can also complain to the ICO if you are unhappy with how we have used your data. The ICO's address:

Information Commissioner's Office Wycliffe House Water Lane Wilmslow Cheshire SK9 5AF

Helpline number: 0303 123 1113 ICO website: https://www.ico.org.uk

This policy was adopted on 23 June 2021.