

# **Pepal Privacy Statement**

## **1. Introduction**

Pepal are committed to protecting any personal information we have about you. This Privacy Statement sets out how we obtain, use and protect your personal information.

We are a "data controller" for the purposes of the Data Protection Act 1998 and (from 25 May 2018) the EU General Data Protection Regulation 2016/679 ("Data Protection Law"). This means that we are responsible for, and control the processing of, your personal information.

The Pepal website contains links to websites owned and operated by third parties. These third-party websites have their own privacy policies - we cannot accept any responsibility or liability for the privacy practices of such third party websites.

## **2. Who we are**

Pepal Foundation is a registered charity (Charity no. 1137688) and Pepal Limited is a Limited Company 6949484. Pepal's registered address is 244 Kilburn High Road, London, NW6 2BS. Pepal brings together leaders from NGOs and global corporations to find practical solutions to pressing social issues.

## **3. What information do Pepal collect about me?**

When you contact Pepal or participate in a Pepal programme, engage with online content, such as newsletters, or you telephone, email, write to or text Pepal, or engage with Pepal via social media channels, we may receive and retain personal information about you. This can consist of information such as your name, email address, postal address, telephone or mobile number and date of birth.

By submitting your details, you enable Pepal (and where applicable any sub-contractors we may use) to provide you with the services, information, activities or online content you select.

Data Protection law recognises that certain categories of personal information are more sensitive. This is known as 'sensitive personal data' and covers information such as health information, race, religious beliefs and political opinions. We do not routinely collect 'sensitive personal data'. We do collect this information where there is a clear reason for doing so. Reasons include, but are not limited to, participation in a Pepal Programme where medical information is needed to ensure that we provide appropriate facilities and keep you safe. Clear notices will be provided on documents which collect this information so that it is clear what information we need and why we need it.

## **4. How will Pepal use the information you collect about me?**

Pepal may use your personal information for a number of purposes including the following:

- in relation to correspondence you have with us (whether by letter, email, text, social media, message board or any other means)
- for administration purposes (e.g. running Pepal programmes)
- for internal record keeping
- to fulfil sales contracts you have entered into with Pepal
- to contact you about any content you provide
- to invite you to participate in surveys or research about Pepal or our work (participation is always voluntary)

- for marketing purposes
- to provide you with information about our activities.
- Employment: we need to ensure that we meet our obligations as an employer and manage people effectively in the organisation.
- Legal, regulatory and tax compliance: where we are subject to a legal obligation, we may process your personal information to fulfil that obligation.

## 6. Legitimate interest

The law allows personal data to be legally collected and used if it is necessary for a legitimate business interest of the organisation - as long as its use is fair and balanced and does not unduly impact the rights of the individual concerned.

In some situations, the best approach for Pepal is to process personal data because of our legitimate interests, rather than consent.

When we use your personal information, we will always consider if it is fair and balanced to do so and if it is within your reasonable expectations. We will balance your rights and our legitimate interests to ensure that we use your personal information in ways that are not unduly intrusive or unfair.

## 7. Your choice

It is your choice as to whether you want to receive information about Pepal. If you do not want us to use your personal information to keep you updated about our activities please let us know.

You may opt-out of our marketing communications at any time by clicking the 'unsubscribe' link in at the end of our marketing emails. You can also change any of your contact preferences at any time by emailing <communications 'at' Pepal.org>

We will not use your personal information for marketing purposes if you have indicated that you do not wish to be contacted by us for such purposes. However, we will retain your details on a list to help ensure that we do not continue to contact you again.

## 8. Will Pepal share my personal information with anyone else?

Pepal will not, under any circumstances, share or sell your personal data with any third party for marketing purposes and you will not receive offers from other companies or organisations as a result of giving your details to us.

We may need to share your information with "data processors" such as our service providers, associated organisations and agents who help us to prepare and send the materials relating to our programmes. These "data processors" will only act under our instruction and we will not allow these organisations to use your data for their own purposes and will do what we can to ensure that they keep your data secure.

We will also comply with legal requests where disclosure is required or permitted by law (for example to government bodies for tax purposes or law enforcement agencies for the prevention and detection of crime, subject to such bodies providing us with a relevant request in writing).

## 9. How long will Pepal keep my personal information?

If you have taken part in a Pepal programme we will delete all information one month after the completion of the programme, however we will retain your contact details to update you about Pepal projects. We will also retain photos taken during the project which may be used for marketing purposes. Where you have given us your explicit permission we may retain comments you have made about the programme and attribute them to you.

If you request that we stop sending you materials we will keep a record of your contact details and appropriate information to enable us to comply with your request not to be contacted by us.

#### **10. How do Pepal update, correct, or delete my personal information?**

The accuracy of your information is important to us. We want to ensure that we are able to communicate with you in ways that you are happy with, and to provide you with information that is of interest. If you wish to change how we communicate with you, or update the information we hold, then please contact us:

- email at: <communications 'at' Pepal.org>
- write to us at: 244 Kilburn High Road, London, NW6 2BS

Under the Data Protection Act you have the right to request a copy of the personal information we hold about you and to have any inaccuracies corrected.

Please address requests and questions about this or any other question about this Privacy Policy to <communications 'at' Pepal.org>

#### **11. Under 16s**

Pepal don't collect and store information about anyone under 16

#### **12. Changes to Pepal's Privacy Policy**

This Privacy Policy may be updated from time to time so you may wish to check it each time you submit personal information to Pepal. The date of the most recent revisions will appear on this page.

#### **13. Complaints compliments or comments**

If you are unhappy with our work or something that we have done or failed to do, we want to know about it. Your comments enable us as an organisation to learn and continuously improve our services. Please email <communications 'at' Pepal.org> with any complaints.