



PRIVACY STATEMENT

Date: 07/05/2020

Watoto Child Care Ministries and our related entities know that the privacy of your personal information, and how we use and share it is very important to you. We take your privacy seriously and will only use your personal information to administer your account and to provide the products and services you have requested from us. We will never sell your personal information, and we will only share or use it as described here.

ABOUT THIS PRIVACY POLICY

This policy sets out how we will use and share the information that you give us, and describes your relationship with Watoto.

WHO WE ARE AND HOW TO CONTACT US

Watoto Child Care Ministries, charity number 1090810, our registered charity name and number in England. We are registered with the Information Commissioner's Office under the Data Protection Act 1998. The data controller is: WATOTO CHILD CARE MINISTRIES. You can get in touch with us in any of the following ways:

Email: uk@watoto.com

Phone: 02032251048

Website: www.watoto.com

Post: CMS House, Watlington Road, Oxford, OX4 B6Z

HOW TO CHANGE YOUR PREFERENCES

You can contact the Watoto UK office Monday to Friday from 9am to 5pm to change or update your preferences at any time.

HOW WE OPERATE

We operate in line with EU General Data Protection Regulations (GDPR) (from May 2018). We are committed to maintaining your personal rights and allow all supporters to change or withdraw their opt-in options at any time. We will also advise you on how to complain to the relevant authorities, namely the Information Commissioner's Office.

WHO THIS PRIVACY POLICY APPLIES TO

Watoto's headquarters are located in Uganda. We have Global Support Offices throughout the world where our partners and sponsors live that raise support and help enable us to meet the needs of the most vulnerable in Uganda and South Sudan.

This policy relates to supporters of Watoto globally. It applies to individuals who have registered with Watoto as a sponsor, donor, Watoto Children's Choir host, visitor, volunteer, customer or a person who relates with us in any other capacity where processing of your data is required in order to offer you these services.

Watoto UK

EMAIL: UK@WATOTO.COM | PHONE: 02032251048 | CMS House, Watlington Road, Oxford, OX4 6BZ

WHAT INFORMATION IS COLLECTED BY WATOTO

We collect personal information when you voluntarily submit it to us to complete a transaction. This includes:

- Information you provide when you set up your sponsorship
- Information you provide when you make a donation
- Information you provide when you sign up to receive updates from us
- Information you provide when you sign up to volunteer, visit Watoto or partner with us
- Information you provide related to Watoto Children's Choir enquiries, bookings and hosting
- Information you provide when you use our website
- Information relating to purchases and other transactions
- Information given and stored as part of our ongoing relationship

SCOPE OF CONSENT

By submitting your personal data to us, you are affirming your explicit consent for such information to be used in accordance with the intended purpose and this privacy policy. You will be able to withdraw that consent at any time by the methods described.

OPTING OUT

Once you have given your consent, you can amend or withdraw your consent at any time. We respect all user rights as defined in GDPR. If you have any comments, concerns or complaints, please contact us.

Under the data protection laws, you have the right to:

- Request access to your personal data
- Request correction of your personal data
- Request that your personal data be deleted
- Object to processing of your personal data
- Request restriction of the use of your personal data
- Request transfer of your personal data
- Right to withdraw consent

To see more, visit: <https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/>

HOW WE STORE AND PROCESS YOUR DATA

We collect information primarily to process donations, sponsorships, volunteering and visiting applications, choir booking and hosting information, and to provide you with information related to our projects, events and activities. We will only use your personal data for the purpose for which we collected it, and only retain it for as long as necessary to fulfill that purpose, including satisfying any legal, accounting, or reporting requirements.

Secure Socket Layer (SSL) Encryption is used when collecting or transferring credit card information via the internet, ensuring a secure environment for the transfer of your confidential data from your browser to our financial institution using the latest encryption technology.

By law we have to keep basic information about our supporters and customers (including Contact, Identity, Financial and Transaction Data) for six years. In some circumstances you can ask us to delete your data - See below for further information. Your personal data will be stored and processed in the UK. For sponsors and regular donors we also employ a CRM (Customer Relationship Management) database to manage your sponsorship and donations. The database server is located in the US. Please note that the Watoto Sponsorship department in Uganda has limited access to this database. Your data will be stored as described here or until you request removal of your personal data from our system.

We use recognised third parties to take payment, manage our company accounts and provide banking services. We will store transactions, payment (this does not include payment card data) and order data for up to 7 years or for as long as required by UK financial and company regulations. These third parties may operate outside the EU.

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We will only use your personal data when legally permitted. Article 6.1 of the GDPR states that “processing shall be lawful only if and to the extent that at least one of the following applies:

- a. the data subject has given consent to the processing of his or her personal data for one or more specific purposes;
- b. processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract;
- c. processing is necessary for compliance with a legal obligation to which the controller is subject;
- d. processing is necessary in order to protect the vital interests of the data subject or of another natural person;
- e. processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller;
- f. processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data, in particular where the data subject is a child.”

Set out below is a description of the ways we intend to use your personal data and the lawful basis (as set out above) on which we will process such data. We have also explained what our legitimate interests are where relevant. We may process your personal data for more than one lawful basis, depending on the specific purpose for which we are using your data. Please contact us if you need details about the specific lawful basis we are relying on to process your personal data as set out in the table below.

| PURPOSE/ACTIVITY | TYPE OF DATA PROCESSED | LAWFUL BASIS FOR PROCESSING |
|---|---|--|
| To process your sponsorship or donation | - Identity - Contact | (a) Given consent to the processing of personal data for a specific purpose (b) Performance of a contract with you |
| To administer finance, including sponsorships, donations and Visit Watoto, volunteer and Watoto 360 payments | - Identity - Contact - Financial - Transaction | (a) Given consent to the processing of personal data for a specific purpose (b) Performance of a contract with you |
| To process and deliver your order including managing payments, fees and charges | - Identity - Contact - Financial - Transaction | (b) Performance of a contract with you |
| To enable you to attend a Watoto event | - Identity - Contact - Financial (where applicable) - Transaction (where applicable) | (a) Given consent to the processing of personal data for a specific purpose (b) Performance of a contract with you (f) Necessary for our legitimate interests, such as studying event attendance |
| To maintain our relationship with sponsors/donors and provide operational information through letters, Christmas updates, fundraising campaigns and our annual report | - Identity - Contact | (a) Given consent to the processing of personal data for this specific purpose (f) Necessary for our legitimate interests, such as sponsor/donor care and promoting our work |
| To promote our work through email updates, campaigns and newsletters | - Identity - Contact | (a) Given consent to the processing of personal data for this specific purpose (f) Necessary for our legitimate interests, such as sponsor/donor care and promoting our work, where it is not in conflict with the interests or fundamental rights and freedoms of the individual |
| To administer your visit, team trip or volunteer activities | - Identity - Contact - Sensitive Data | a) Given consent to the processing of personal data for this specific purpose (d) Processing is necessary in order to protect the vital interests of the individual |
| To administer and protect our business and our site (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data) | - Identity - Contact - Technical | c) Necessary to comply with a legal obligation (f) Necessary for our legitimate interests for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise |

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to find out more about how the processing for the new purpose is compatible with the original purpose, please email us. If we need to use your personal data for a purpose unrelated to the purpose for which we collected the data, we will notify you and we will explain the legal ground of processing.

We may process your personal data without your knowledge or consent where this is required or permitted by law.

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COMMUNICATIONS

Sponsors will receive our Christmas updates as well as letters from the UK office and your sponsored child or mother. You will also receive email updates, fundraising campaigns and newsletters from us if you have opted in, for example through our website, forms at Watoto events or by phone/email in response to the GDPR consent requirement.

You can withdraw your permission to receive our emails at any time by using the unsubscribe link found at the bottom of our email updates, fundraising campaigns and newsletters.

OUR OBLIGATIONS

In relation to the information that you provide to Watoto, we are legally responsible for how that information is handled. We will comply with the Data Protection Act 1998 and the GDPR (2018) in the way we use and share your personal data.

Watoto intends to ensure that personal information is treated lawfully and correctly and we adhere to the Principles of Data Protection which require that personal information:

- Fairly and lawfully
- As set out in the legislation and this policy
- To the extent necessary for intended purposes

We will take reasonable precautions to safeguard the personal information that you provide. Watoto may use your information for account management and to maintain the existing relationship we have with you, to thank you for your support and to provide you with information about our work and events.

THIRD PARTIES

We may have to share your personal data with the parties set out below for the purposes set out in table 1:

- Service providers who provide IT and system administration services.
- Professional advisers including bankers, auditors and insurers who provide consultancy, banking, legal, insurance and accounting services.
- HM Revenue & Customs, regulators and other authorities based in the United Kingdom and other relevant jurisdictions who require reporting of processing activities in certain circumstances.

We require all third parties to whom we transfer your data to respect the security of your personal data and to treat it in accordance with the law. We only allow such third parties to process your personal data for specified purposes and in accordance with our instructions.

SECURITY

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used, accessed, altered or disclosed in an unauthorised way. In addition, we limit access to your personal data to those employees, service providers and other third parties who have a business “need to know” of such data. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so. We will report any breaches or potential breaches to the appropriate authorities within 24 hours and to anyone affected by a breach within 72 hours.

If you have any queries or concerns about your data usage, please contact us.

CONTACTING US AND EXERCISING YOUR INFORMATION RIGHTS

If you have any questions or comments about this Privacy Policy, wish to exercise your information rights in connection with the personal data you have shared with us or wish to submit a complaint, please contact our Watoto UK office at the contact listed above. We fully comply with Data Protection legislation and will assist in any investigation or request made by the appropriate authorities.

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