

## Oxford Kurdish Association Privacy Policy

This Privacy Policy applies to information Oxford Kurdish Association collects about individuals who interact with our charity. It explains what personal information we collect and how we use it.

We manage your personal information in accordance with the General Data Protection Regulation (GDPR) that came into force in May 2018.

If you have any comments or questions about this notice, feel free to contact us at [info@oka.org.uk](mailto:info@oka.org.uk).

### 1. Personal data that we collect and process

The following table explains the types of data we collect and the legal basis, under current data protection legislation, on which this data is processed.

<b>Purpose</b>	<b>Data (key elements)</b>	<b>Basis</b>
Enquiring about our organisation and its work	Name, email, message	Legitimate interests - it is necessary for us to read and store your message so that we can respond in the way that you would expect.
Subscribing to email updates, news and events	Name, email, phone number, postal address	Consent - you have given your active consent. This informational will be stored securely and used to provide news, updates, and invite your to events and to collaborate and
Making a donation	Name, email, payment information, postal address	Legitimate interests - this information is necessary for us to fulfill your intention of donating money and your expectation of receiving a confirmation message.
Signing up as a member	Name, email, phone number	Contract – by subscribing a a member you agree for your data to be stored and used according to the membership terms and

		conditions.
Website functionality	Website activity collected through cookies	Legitimate interests - it is necessary for us to store a small amount of information, usually through cookies, to deliver functionality that you would expect and collect statistical information about our website activity
Work-related activities	Name, email, phone number, postal address, employment details, professional interests	Consent - you have given your active consent. We will collect information you tell us in person, provide on a business card, via social media or by email. We will use it to invite you to collaborate with us and participate in relevant work-related activities.
Photos	Name, photo	For events, we will state in the beginning that we will be taking photos. You can request at any time not to be photographed and do not wish for your photos to be used in our communications. Occasionally we may request photos of our supporters, for example of those who complete fundraising challenges for us.

## 2. How we use your data

We will only use your data in a manner that is appropriate considering the basis on which that data was collected, as set out in the table at the top of this policy.

For example, we may use your personal information to:

- reply to enquiries you send to us;
- handle donations or other transactions that you initiate;

- where you have specifically agreed to this, send you marketing communications by email relating to our work which we think may be of interest to you.
- send event invitations and e-newsletters

### 3. When we share your data

We will only pass your data to third parties in the following circumstances:

- you have provided your explicit consent for us to pass data to a named third party;
- we are using a third party purely for the purposes of processing data on our behalf and we have in place a data processing agreement with that third party that fulfils our legal obligations in relation to the use of third party data processors; or
- we are required by law to share your data.

Where we use third parties to send our emails or process your donations, we only use internationally recognised providers who are subject to EU data protection regulations.

E-Newsletters: When signing up to our e-newsletters and event invitations, the contact details you provide is collected by the mailing system, MailChimp, which creates mailing lists and sends emails on our behalf. For more details of how MailChimp manages your data, please visit: <https://mailchimp.com/legal/privacy/>

Online donations: We accept online donations via PayPal and Virgin Money Giving. These providers collect the information necessary to process your donation - name, contact details, billing address and payment details – on our behalf.

For more details of how PayPal manages your data, visit:  
<https://www.paypal.com/uk/webapps/mpp/ua/privacy-full>

For more details on how Virgin Money Giving manages your data, please visit:  
<https://uk.virginmoneygiving.com/giving/terms/privacy-policy.jsp>

In addition, we will only pass data to third parties outside of the EU where appropriate safeguards are in place as defined by Article 46 of the General Data Protection Regulation.

### 4. How long we keep your data

We take the principles of data minimisation and removal seriously and have

internal policies in place to ensure that we only ever ask for the minimum amount of data for the associated purpose and delete that data promptly once it is no longer required.

Where data is collected on the basis of consent, we will keep your data for as long as you consent to hearing from us. You can unsubscribe from all our communications at any time by clicking on the links in the e-newsletter or emailing us at [info@oka.org.uk](mailto:info@oka.org.uk).

## 5. Rights you have over your data

You have a range of rights over your data, which include the following:

- Where data processing is based on consent, you may revoke this consent at any time and we will make it as easy as possible for you to do this (for example by putting 'unsubscribe' links at the bottom of all our marketing emails).
- You have the right to ask for rectification and/or deletion of your information.
- You have the right of access to your information.
- You have the right to lodge a complaint with the Information Commissioner if you feel your rights have been infringed.

A full summary of your legal rights over your data can be found on the Information Commissioner's website here: <https://ico.org.uk/>

If you would like to access the rights listed above, or any other legal rights you have over your data under current legislation, please get in touch with us.

Please note that relying on some of these rights, such as the right to deleting your data, will make it impossible for us to continue to deliver some services to you. However, where possible we will always try to allow the maximum access to your rights while continuing to deliver as many services to you as possible.

## 6. Cookies & usage tracking

A cookie is a small file of letters and numbers that is downloaded on to your computer when you visit a website. Cookies are used by many websites and can do a number of things, eg remembering your preferences, recording what you have put in your shopping basket, and counting the number of people looking at a website.

Where cookies are used to collect personal data, we list these purposes in section 1

above, along with other personal data that we collect. However, we also use some cookies that do not collect personal information but that do help us collect anonymous information about how people use our website. We use Google Analytics for this purpose. Google Analytics generates statistical and other information about website usage by means of cookies, which are stored on users' computers. The information collected by Google Analytics about usage of our website is not personally identifiable. The data is collected anonymously, stored by Google and used by us to create reports about website usage. Google's privacy policy is available at <http://www.google.com/privacypolicy.html>.

## 7. Modifications

We may modify this Privacy Policy from time to time and will publish the most current version on our website. If a modification meaningfully reduces your rights, we'll notify people whose personal data we hold and is affected. This Privacy Policy was last updated in October 2019.