Fighting Poverty in Zambia

Data Privacy Notice for Donors and Suppliers

Fighting Poverty in Zambia is committed to protecting and respecting your privacy.

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.

The rules on processing of personal data are set out in the General Data Protection Regulation (the “GDPR”) and the Data Protection Act 2018.

1 Who are we?

Fighting Poverty in Zambia is the data controller. This means we decide how your personal data is processed and for what purposes. Our contact details for data protection matters are: Mick James on 07850501394 or via email at mrmickjames67@gmail.com

2 What kind **of personal data do we collect?**

**Donor data**: We need to collect and use contact information of individuals necessary for the smooth running of the charity, and in particular the reclamation of any tax from HMRC. This contact information includes:

* Name, address, email address, telephone number, title.

We have obtained or will obtain your personal data from you directly, or from the organisation providing the donation portal through which you made your donation.

**Supplier data**:

* Name, charity/company name and address, email address, charity/company telephone number, job title, financial data (if the supplier is an individual or sole trader) for payment such as bank details and VAT registration).

We have obtained or will obtain your personal data from you directly, or from the organisation for whom you work.

3 **The purpose(s) of processing your personal data**

**Donor data**: We use your personal data for the purpose of ensuring that we are able to reclaim tax from HMRC.

**Supplier data**: We use your personal data so the contractual arrangements between us, or between the organisation for whom you work and us, can be properly implemented so that the relationship can run smoothly, and to comply with legal requirements.

4 **What is our legal basis for processing your personal data?**

Our lawful basis for processing your personal data:

* Your consent; or
* Processing necessary for the performance of a contract with you or with the organisation for whom you work or to take steps to enter into such a contract; or
* For the purposes of purchasing supplies and services for the legitimate running of the business;or
* Processing necessary for compliance with a legal obligation.

More information on lawful processing can be found on the ICO website.

5 **Sharing your personal data**

Your personal data will be treated as strictly confidential, and will be shared only with trustees of Fighting Poverty in Zambia to help meet the purposes set out in paragraph 3 above.

6 **How long do we keep your personal data?**

We keep your personal data for no longer than reasonably necessary, but may be for a period of 6 years beyond the end of the contract with you or with the organisation for whom you work. Examples include: in case of any legal claims/complaints, accounting etc., for example for accounting purposes we must keep records for 6 years from the end of the last company financial year they relate to.

7 **Providing us with your personal data**

You are under no statutory or contractual requirement or obligation to provide us with your personal data, but failure to do so will have the following consequences: Reduce or prevent communication with you or the organisation for whom you work during the contract; delay or prevent payment for goods and services.

8 **Your rights and your personal data**

Unless subject to an exemption under the GDPR, you have the following rights with respect to your personal data:

* The right to request a copy of the personal data which we hold about you.
* The right to request that we correct any personal data if it is found to be inaccurate or out of date.
* The right to request your personal data is erased where it is no longer necessary to retain such data.
* The right to withdraw your consent to the processing at any time, where consent was your lawful basis for processing the data.
* The right to request that we provide you with your personal data and where possible, to transmit that data directly to another data controller, (known as the right to data portability), (where applicable i.e. where the processing is based on consent or is necessary for the performance of a contract with the data subject and where the data controller processes the data by automated means).
* The right, where there is a dispute in relation to the accuracy or processing of your personal data, to request a restriction is placed on further processing.
* The right to object to the processing of personal data, (where applicable i.e. where processing is based on legitimate interests (or the performance of a task in the public interest/exercise of official authority); direct marketing and processing for the purposes of scientific/historical research and statistics).

9 **Transfer of Data Abroad**

In limited and necessary circumstances, your personal data may be transferred outside of the EEA or to an international organisation to comply with our legal or contractual requirements. If this were to occur we would put in place safeguards including standard data protection clauses in the form adopted by the EU Commission to ensure the security of your data.

10 **Automated Decision Making**

We do not use any form of automated decision making in our business.

11 **Changes to our privacy policy**

We reserve the right to update or amend this privacy notice at any time, including where we intend to further process your personal data for a purpose other than that for which the personal data was collected or where we intend to process new types of personal data. We will issue you with a new privacy notice when we make significant updates or amendments. We may also notify you about the processing of your personal information in other ways.

12 **How to make a complaint**

To exercise all relevant rights, queries or complaints please in the first instance contact Mick James on 07850501394 or via email at mrmickjames67@gmail.com.

If this does not resolve your complaint to your satisfaction, you have the right to lodge a complaint with the Information Commissioner’s Office on 03031231113 or via email: https://ico.org.uk/global/contact-us/email/ or at the Information Commissioner’s Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF, England.