

## PRIVACY NOTICE

Adopt-A-Child UK is dedicated to safeguarding and preserving your privacy. This privacy notice will inform you how we look after your personal data, and tell you about your privacy rights and how the law protects your personal data.

Detailed in this privacy notice is how Adopt-A-Child UK collects and processes your personal data through use of our website and other means, including post, telephone, and email.

### 1. Who we are

Adopt-A-Child in the UK is a Scottish Charity No. SC 029685, and a Charitable Company Limited by Guarantee, No. 202663. Reg. Office: AAC, Culloden Centre, Keppoch Road, Culloden, Inverness, IV2 7LL Scotland.

Within the context of this notice “we”, “our” & “us” refers to Adopt-A-Child in the UK (the Data Controller). This means that we are responsible for, and control the processing of, the personal information you provide to us in accordance with this privacy notice.

By using our website (<http://www.adopt-a-child.com>) you are accepting and consenting to the practices described in this notice.

### 2. How we get your personal information

2.1. Most of the personal information we process is provided to us **directly by you** for one of the following reasons:

- a) You send us an enquiry
- b) You register to Sponsor a Child
- c) When you donate online
- d) Subscribe to our mailing list
- e) You apply for a job with us, i.e. providing a CV or other information about yourself for specific purposes

If you contact us, we may keep a record of that correspondence. If you send us personal information which identifies you via email, we may keep your email and email address, and we will only use these details for the purposes in which it was given, or consented to.

2.2. We also receive personal information **indirectly**, in the following scenarios:

- a) We receive personal data about you from various third parties and public sources.
- b) As you interact with our website, we may automatically collect technical data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, server logs and other similar technologies.
- c) Technical Data such as IP address, browser type and version, from analytics providers, advertising networks, and search information providers.
- d) Your contact details, along with financial data, and details of your transaction from providers of technical payment and delivery services.
- e) Your identity and contact details from publicly available sources such as social media sites.
- f) An employee of ours gives your contact details as an emergency contact or a referee.

### 3. What we do with your personal information

This section of the privacy notice provides clarity on what we do with your personal information. For this purpose, we have grouped your personal data into the following categories:

**Category: When you send us an enquiry, and/or offer to help**

<b>1. Purpose</b>	To provide you with the information for your enquiry, and be able to respond to you accordingly.
<b>2. Legal basis for processing your data</b>	Contractual
<b>3. What data do we need / and what is collected?</b>	We need enough information from you to answer your enquiry, such as, name, telephone number, email address, church details.
<b>4. What we do with it</b>	We will keep a record of your details, and will then pass these details to the correct area of the business to be dealt with. We will also keep a record of our response.
<b>5. How long we keep it</b>	From 6-months following the last action. Unless correspondence relates to a further contractual agreement, then it is kept for 7 years.
<b>6. Do we use any data processors?</b>	Living Water Adopt A Child; Yellow Cherry Digital

**Category: When you register to Sponsor a Child**

<b>1. Purpose</b>	So that we can ensure we have the necessary contact details required to provide you with an acceptable service.
<b>2. Legal basis for processing your data</b>	Contractual
<b>3. What data do we need / and what is collected?</b>	For the purposes of our sponsorship programme, we require certain information about you, such as, name, address, contact telephone numbers, email address, Church, gift aid agreement, standing order bank details (a/c number, sort code) – all sent to the bank we don't store any information, the adopted child's number and first name.
<b>4. What we do with it</b>	We will keep a record of your details, in paper form and an electronic copy. All payment details are kept secure in accordance with PCI Compliance.
<b>5. How long we keep it</b>	For 7 years following termination of your sponsorship contract.
<b>6. Do we use any data processors?</b>	Donor Perfect; Donor Shop; Living Water Adopt A Child; GoCardless; Paysafe.

**Category: When you donate online**

<b>1. Purpose</b>	To ensure that your donation is processed and handled correctly.
<b>2. Legal basis for processing your data</b>	Contractual
<b>3. What data do we need / and what is collected?</b>	We need enough information to manage your donation, such as, name, email address, postal address, telephone numbers, payment details.
<b>4. What we do with it</b>	We will keep a record of your details, in paper form and an electronic copy. All payment details are kept secure in accordance with PCI Compliance.
<b>5. How long we keep it</b>	For 7 years from receiving the donation.
<b>6. Do we use any data processors?</b>	Donor Perfect; Donor Shop; Living Water Adopt A Child; GoCardless; Paysafe.

<b>Category: <u>When you subscribe to our mailing list</u></b>	
<b>1. Purpose</b>	So that we can add your personal details to our mailing list for you to receive news, and important updates.
<b>2. Legal basis for processing your data</b>	Consent
<b>3. What data do we need / and what is collected?</b>	We need enough information from you so we can add your details to our mailing list and you can receive the requested information, such as, name, telephone number, email address.
<b>4. What we do with it</b>	We add your contact details to our mailing list database, which we then use as a tool for sending out the consented information. Where you have consented, we process your personal data for marketing purposes.
<b>5. How long we keep it</b>	For the duration of your consent. Once consent has been withdrawn/cancelled then your personal details are securely erased from our mailing list.
<b>6. Do we use any data processors?</b>	Living Water Adopt A Child; Donor Perfect; Johnston Mailing.

<b>Category: <u>When you apply for a job with us</u></b>	
<b>1. Purpose</b>	To assess suitability for the role/position applied for. Plus, confirmation of identity, and where applicable, validation of qualifications.
<b>2. Legal basis for processing your data</b>	For the performance of a contract, or prior to entering into a contract. To comply with legal or regulatory requirements.
<b>3. What data do we need / and what is collected?</b>	<p>We'll use the contact details you give us to contact you to progress your application. We'll use the other information you provide to assess your suitability for the role, such as, contact details, CV information, referees.</p> <p>We'll use all the information you provide during the recruitment process to progress your application with a view to offering you an employment contract with us, or to fulfil legal or regulatory requirements if necessary, such as, confirmation of identity, right to work in the country of employment, bank details, emergency contact information, health questionnaire.</p> <p>We will not share any of the information you provide with any third parties for marketing purposes.</p>
<b>4. What we do with it</b>	We will keep a record of your details, in paper form and an electronic copy, which we share with those involved in the recruitment process and decision making.
<b>5. How long we keep it</b>	<ul style="list-style-type: none"> <li>- Successful recruitment candidate information – all paperwork will be attached with employee records, and retained following these guidelines (i.e. 6 years following the end of employment).</li> <li>- Unsuccessful recruitment candidate information – all paperwork will be securely destroyed after 6-months following the last action.</li> </ul>
<b>6. Do we use any data processors?</b>	Highland Payroll Services

#### 4. Your Data Protection Rights

Under data protection law, you have rights we need to make you aware of. The rights available to you depend on our reason for processing your information. If we are processing your information for criminal law enforcement purposes, your rights are slightly different.

- a) **Your right of access** - you have the right to ask us for copies of your personal information, and find out how we are using or storing your personal data. This right always applies. However, there are some exemptions, which means you may not always receive all the information we process. You exercise this right by asking for a copy of the data, which is commonly known as making a 'subject access request'. We will respond to your request within one month, however in certain circumstances we may need extra time to consider your request which may take up to an extra two months. If we are going to do so, we will let you know within one month that we need more time and why.  
A copy of your personal data will be provided free of charge, unless we consider your request 'manifestly unfounded or excessive', then we will ask for a reasonable fee to cover administrative costs associated with the request.
- b) **Your right to rectification** - you have the right to ask us to rectify information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete. This right always applies.
- c) **Your right to erasure** - you have the right to ask us to erase your personal information in certain circumstances.
- d) **Your right to restriction of processing** – you have the right to object to the processing of your personal data in some circumstances. If we agree to your objection, we will stop using your data for that purpose unless we can give strong and legitimate reasons to continue using your data despite your objections. You have an absolute right to object to us using your data for direct marketing.
- e) **Your right to data portability** - This only applies to information you have given us. You have the right to ask that we transfer the information you gave us from one organisation to another, or give it to you. The right only applies if we are processing information based on your consent, or in talks about entering into a contract and the processing is automated.

#### 5. Sharing your personal information

We will never share your personal data with a third party without your prior consent to do so. You have the right to ask us not to process your personal data for marketing purposes, therefore if you wish to change your mailing preferences or opt-out of specific marketing communications, you may follow the instructions on the relevant forms, or notify us on the contact details provided in this privacy notice.

We use data processors who are third parties to provide elements of services for us. We have contracts in place with our data processors. This means that they cannot do anything with your personal information unless we have instructed them to do it. They will not share your personal information with any organisation apart from us. They will hold it securely and retain it for the period we instruct.

In some circumstances we are legally obliged to share information. We'll satisfy ourselves that we have a lawful basis on which to share the information and document our decision making and satisfy ourselves we have a legal basis on which to share the information.

Current data protection law, imposes restrictions on the transfer of personal data outside the European Union, to third countries or international organisations. These restrictions are in place to ensure that the level of protection of individuals afforded by the current regulations is not undermined. Personal data may only be transferred outside of the EU in compliance with the conditions for transfer. Companies may transfer personal data where the organisation receiving the personal data has provided adequate safeguards. Individuals' rights must be enforceable and effective legal remedies for individuals must be available following the transfer.

## **6. Links to other websites**

Where we provide links to websites of other organisations, this privacy notice does not cover how that organisation processes personal information. We encourage you to read the privacy notices on the other websites you visit.

## **7. Our use of Cookies**

Cookies allow web applications to respond to you as an individual. The web application can then tailor its operations to your needs, likes and dislikes by gathering and remembering information about your preferences.

Overall cookies help us provide you with a better website, by enabling us to monitor which pages you find useful and which you do not. A cookie in no way gives us access to your computer or any information about you, other than the data you choose to share with us.

You will be given the opportunity to accept or reject the use of cookies in a pop-up box when you first access our website. You may choose not to accept the 'cookies', however, this may prevent you from taking full advantage of the website.

We use Google Analytics to analyse the use of our website. Google Analytics gathers information about website use by means of cookies. The information gathered relating to our website is used to create reports about the use of our website. Google's privacy policy is available at: <https://www.google.com/policies/privacy/>.

## **8. Changes to our privacy notice**

Any changes we make to our privacy notice in the future will be posted on this page. If the revised version includes a substantial change, we will provide you with 30 days prior notice by posting notice of the change on our website. We also may notify you of the change using email or other means.

## **9. How to contact us**

Questions, comments and requests regarding this privacy notice are welcomed and should be addresses to:

- UK Office - Tel: 01463-792600
- Email: [aacuk@lwintl.org](mailto:aacuk@lwintl.org)

If you are not satisfied by the way in which we address your concerns, you have the right to lodge a complaint with the Supervisory Authority for data protection in your country.