



Windle Trust International Privacy Policy

Windle Trust International (WTI) is dedicated to increasing access to and improving the quality of education for communities affected by conflict, displacement, neglect or discrimination in East Africa and the Horn of Africa.

WTI is a British registered charity (No. 1092834) and company limited by guarantee (No.4285691) registered in England. WTI's registered office is 37a Oxford Road, Cowley, Oxford, OX4 2EN, United Kingdom. WTI is also registered to operate in Sudan and South Sudan and has offices in these countries.

Privacy of personal information

WTI is committed to protecting personal information and privacy. This policy sets out the basis on which we collect and process or use any personal information and how we keep this secure. We are committed to following the general data protection regulations and best practice.

The personal information we collect

We collect personal information on a number of categories of individuals such as applicants for positions and personnel, trustees, scholarship and programme applicants and recipients, donors and partners and others that have a relationship with WTI in order to manage our organisation and deliver activities and services.

The type of information we collect and how we use it will depend on the relationship with WTI. We will only collect information that we assess to be necessary and use it for the purpose it was intended.

The personal information we collect may include:

- Personal details such as name, contact details, nationality, date of birth, educational background, employment history, financial information such as account details
- Certain sensitive personal data such as on health, ethnicity or criminal record

We collect this information when, for example, you get in touch with us, make a donation, apply for a job, scholarship or to be considered for support through our programmes.

How we use personal information

We collect and process personal information for a number of reasons that may include:

- To enter in to or fulfil an agreement or contractual relationship such as with an institutional donor or grant maker, supplier of goods or services, contracted personnel, recipients of some services we deliver through our programmes
- Comply with a legal obligation or other statutory requirement, for example, in relation to employment (including prospective employees), health and safety, financial

accountability (including processing donations), governance and charitable registration where we operate

- To pursue our legitimate interest in furthering the charitable aims and objectives of the organisation, including raising funds for our work, promoting what we do and the delivery of programmes and initiatives that promote access to and improve the quality education
- respond to queries or send communications that have been requested and that may be of interest such as newsletters and information about our work

Sensitive personal data is collected in relation to prospective and actual employees or those who work for us to fulfil legal obligations in relation to recruitment and employment. It may also be required for applicants and recipients of programmes, for example, where this is necessary to assess eligibility, for equity, or provide appropriate support such as in relation to health.

We treat any sensitive personal data with great care and process the information in accordance with the Data Protection regulations.

Sharing information

We may share or disclose necessary personal information to third parties where we:

- Are under a duty to comply with any contractual or legal obligation. This includes, for example, government departments in relation to statutory payroll deductions or undertaking due diligence in relation to donations and fraud prevention.
- Partner with other organisations or consultants to implement, monitor or evaluate programme services or training. For example, teacher or skills training.

These activities will be carried out under a written agreement that requires third parties to keep information confidential, secure and only use it for the stated purpose it is intended.

Due to the nature of WTI's work some personal information may be transferred outside the Economic Union (EU). For example, data that is necessary to facilitate our personnel or trustees to travel to countries where WTI has an office or the region of Africa where WTI works. Personal data is provided by non EU applicants for our scholarship programmes from non EU countries and stored on our secure database in the UK. This information is shared with organisations such as Windle International Kenya and Windle International Uganda that are involved with delivering our work and have adequate safeguards in place for the protection of data.

Fundraising and communication

WTI raises funds primarily through institutional donors and grant makers and working in partnership with other organisation such as UN agencies. Information we collect and process in relation to fundraising and prospective donors is through networking and from publically available sites such as the charity commission, the Directory of Social Change Trust funding.org and general internet searches. This is with the purpose of researching and

assessing prospective sources of funds and where individuals have a reasonable expectation that their details will be used or they might be contacted.

WTI does not currently raise funds through general public marketing campaigns. Although, it is possible for an individual to make a donation to us directly or through our website and secure donations sites such as Just Giving.

We will never share or sell personal data we collect with any third parties for their marketing purposes.

The WTI website and use of “cookies”

The WTI website uses cookies that are essential to the way the website works and do not contain any personally identifiable information:

- A "session" cookie to let the website know whether the browser supports javascript that expires when the browser is closed.
- A "persistent" cookie is set when registered users, such as staff and scholarship applicants, log in to their account through the website portal. This identifies the account and enables users to access services that are only available to them. The cookie does not hold any personal data. Its lifetime is limited to 24 hours after the website is closed so users may revisit within a short period without being automatically logged out. The cookie is deleted immediately when the user logs out. Users should always log out if they are leaving computers unattended, particularly when in a public place.

To help us improve the website, Google Analytics uses several "persistent" cookies (_ga, _gat, _gid) to monitor use of the site, for example, to track which pages are visited. All tracking data, such as an IP address, is anonymised and the only purpose is for aggregate, statistical analysis.

Our website may contain links to other organisation websites, which we are not responsible for. This privacy policy applies to WTI and visitors to linked sites should read the privacy statements on those websites.

How we store and protect information

We handle personal data confidentially. We have technical, physical and organisational measures in place to keep secure the personal information we hold in our electronic and paper based systems and to minimise the risk of unauthorised access to, use or disclosure of personal information.

WTI may use the services of other organisations to ensure that the data we hold is secure. For example IT support for our computer systems, for the management of our database or our electronic banking system such as Barclay.net for the processing of payments.

How long we keep personal information

The length of time personal information is held varies depending on the type of information and why it was collected in line with retention schedules. We will only keep personal

information for as long as is necessary for its intended use. This might be to comply with contractual and legal obligations such as certain employee and financial information. In the context of our programmes information might be retained after the end of the project for a specified period to meet requirements for programme and financial audits, evaluations and historical and statistical purposes to improve programmes and demonstrate the impact of our work. Where the personal data we hold is no longer necessary this data might be aggregated and anonymised so that a particular individual cannot be identified.

We may need to retain some, minimal information in order to respect a person's request to be excluded from being contacted, for example, where this was on the basis of consent to receive information from us.

Information rights and how to access your personal information

WTI will always try to ensure that the data we hold is up to date, reasonable and not excessive. Individuals have certain rights in relation to their personal data that includes being able to request:

- What, if any, personal information WTI is processing by making a 'subject access request'. Individuals may request a description or copy of the information held, and find out why we are holding it and who it might be shared with
- Updates or amendments to personal information to correct any inaccurate data
- Personal information to be erased, to object to, restrict or stop the processing or use of their personal data

The purpose and legal basis upon which the personal information was collected and used may determine whether WTI can fulfil the request. For example, individuals have the absolute right to prevent their personal data being processed for direct marketing. In other circumstances we may be unable to comply if there are contractual or legal obligations or an overriding legitimate interest for keeping or using personal information.

We will also need to get certain personal information from you in order to respond to your request, for example, to verify you are the individual concerned.

Contacting us

To make a request or if you have questions about this policy please contact us at info@windle.org.uk

WTI tries to meet the highest standards when collecting and using personal information. However, if you want to make a complaint about the way we have processed your information, feel our collection or use of information is unfair, misleading or inappropriate, please get in touch.

Updates or changes to this Privacy Policy

We will review and amend this policy from time to time to ensure it remains up-to-date and accurately reflects how and why we use personal data. The current version of our Privacy Policy will always be posted on our website.

Last updated: May 2018