



## **Kids Club Kampala Privacy Policy**

We are committed to protecting your personal data and respecting your privacy. We take data protection legislation seriously, and we want you to feel confident that your personal information is secure and treated with care. This Privacy Policy outlines how we collect, use and safeguard your information when you engage with our charity, as you collaborate with us to support vulnerable children and see poverty reduced throughout Kampala’s slums.

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### **Who we are**

We are Kids Club Kampala a charity registered in England and Wales with charity number 1152451 with our registered office being 148 Witton Lodge Road, Birmingham, B23 5AP, United Kingdom. You can contact us by email ([info@kidsclubkampala.org](mailto:info@kidsclubkampala.org)) and phone too (+44(0)7971 601 154).

We are also a charity registered in Ireland with charity number 20103835 with our registered address being 22 Bowling Green Close, Erdington, Birmingham, United Kingdom. Our charity registered in Ireland acts as our representative within the EEA.



## **What personal data we collect and how we collect your data**

The personal data we collect about you depends on the particular products and services we provide to you. We will collect and use the following personal data about you:

- your name and contact information, including email address, postal address, telephone number and company details
- information to check and verify your identity, eg your date of birth
- your gender
- your billing information, transaction and payment card information
- your tax payer information, for the purposes of claiming gift aid
- your personal or professional interests
- your contact history, purchase history and saved items
- information from accounts you link to us, eg Facebook
- information about how you use our website, IT, communication and other systems
- your responses to surveys, competitions and promotions

We collect and use this personal data for the purposes described in the section 'How we use your data' below. If you do not provide personal data we ask for, it may delay or prevent us from providing products or services to you.

We collect your data in a number of ways: when you make a donation(s), through our online shops, when you attend a fundraiser, join our mailing list, volunteer with us in the UK or in Uganda, or when you use the contact form on our website to get in touch with us. Kids Club Kampala doesn't collect any personal information from a minor without the consent of their parents. Your details are kept safely on our secure database.

We subscribe to the best fundraising practice guidelines provided by the Chartered Institute of Fundraising and The Fundraising Regulator. Kids Club Kampala fully subscribes to The Data Protection Act (1998), The E-communications Act (2003) and The Charities Act (2016).

We will never intentionally misuse or allow others to misuse any personal data it collects or holds.

## **How we use your data**

Under data protection law, we can only use your personal data if we have a proper reason, eg:

- where you have given consent;
- to comply with our legal and regulatory obligations;
- for the performance of a contract with you or to take steps at your request before entering into a contract; or
- for our legitimate interests or those of a third party.



A legitimate interest is when we have a business or commercial reason to use your personal data, so long as this is not overridden by your own rights and interests. We will carry out an assessment when relying on legitimate interests, to balance our interests against your own.

The table below explains what we use your personal data for and why.

What we use your personal data for	Our reasons
Providing products or services to you	To perform our contract with you or to take steps at your request before entering into a contract
Preventing and detecting fraud against you or us	For our legitimate interest, ie to minimise fraud that could be damaging for you and/or us
Conducting checks to identify our customers and verify their identity Screening for financial and other sanctions or embargoes Other activities necessary to comply with professional, legal and regulatory obligations that apply to our business, eg under health and safety law or rules issued by our professional regulator	To comply with our legal and regulatory obligations
To enforce legal rights or defend or undertake legal proceedings	Depending on the circumstances: —to comply with our legal and regulatory obligations; —in other cases, for our legitimate interests, ie to protect our business, interests and rights
Gathering and providing information required by or relating to audits, enquiries or investigations by regulatory bodies	To comply with our legal and regulatory obligations
Ensuring business policies are adhered to, eg policies covering security and internet use	For our legitimate interests, ie to make sure we are following our own internal procedures so we can deliver the best service to you
Operational reasons, such as improving efficiency, training and quality control	For our legitimate interests, ie to be as efficient as we can so we can deliver the best service to you



Ensuring the confidentiality of commercially sensitive information

Depending on the circumstances:

- for our legitimate interests, ie to protect trade secrets and other commercially valuable information;
- to comply with our legal and regulatory obligations

Statistical analysis to help us manage our business, eg in relation to our financial performance, customer base, product range or other efficiency measures

For our legitimate interests, ie to be as efficient as we can so we can deliver the best service to you

Preventing unauthorised access and modifications to systems

Depending on the circumstances:

- for our legitimate interests, ie to prevent and detect criminal activity that could be damaging for you and/or us;
- to comply with our legal and regulatory obligations

Protecting the security of systems and data used to provide the goods and services

To comply with our legal and regulatory obligations

We may also use your personal data to ensure the security of systems and data to a standard that goes beyond our legal obligations, and in those cases our reasons are for our legitimate interests, ie to protect systems and data and to prevent and detect criminal activity that could be damaging for you and/or us

Updating and enhancing customer records

Depending on the circumstances:

- to perform our contract with you or to take steps at your request before entering into a contract;
- to comply with our legal and regulatory obligations;
- for our legitimate interests, eg making sure that we can keep in touch with our customers about existing orders and new products



<p>Statutory returns</p>	<p>To comply with our legal and regulatory obligations</p>
<p>Ensuring safe working practices, staff administration and assessments</p>	<p>Depending on the circumstances:        —to comply with our legal and regulatory obligations;        —for our legitimate interests, eg to make sure we are following our own internal procedures and working efficiently so we can deliver the best service to you</p>
<p>Marketing our services and those of selected third parties to:        —existing and former customers;        —third parties who have previously expressed an interest in our services;        —third parties with whom we have had no previous dealings.</p>	<p>For our legitimate interests, ie to promote our business to existing and former customers</p>
<p>External audits and quality checks, eg for ISO or Investors in People accreditation and the audit of our accounts to the extent not covered by ‘activities necessary to comply with legal and regulatory obligations’ above</p>	<p>Depending on the circumstances:        —for our legitimate interests, ie to maintain our accreditations so we can demonstrate we operate at the highest standards;        —to comply with our legal and regulatory obligations</p>
<p>To share your personal data with members of our group and third parties that will or may take control or ownership of some or all of our business (and professional advisors acting on our or their behalf) in connection with a significant corporate transaction or restructuring, including a merger, acquisition, asset sale, initial public offering or in the event of our insolvency        In such cases information will be anonymised where possible and only shared where necessary</p>	<p>Depending on the circumstances:        —to comply with our legal and regulatory obligations;        —in other cases, for our legitimate interests, ie to protect, realise or grow the value in our business and assets</p>



#### Postal address

We use your postal address to contact you about your donation(s). We will only contact you for marketing purposes where there is legitimate interest for us to do so.

#### Telephone number

We use your telephone number to contact you about your donation(s). We will only contact you for marketing purposes where there is legitimate interest for us to do so. We will not contact you by telephone if you are registered on the Telephone Preferential Service (TPS) unless we have a specific opt-in from you for us to contact you by telephone or the call is of administrative nature.

#### Email address

We only send you emails, including our newsletter, if you have given us your consent. You can unsubscribe to our emails at any time, by using the 'unsubscribe' link at the bottom of all our emails, or by getting in touch by emailing us at [info@kidsclubkampala.org](mailto:info@kidsclubkampala.org).

### **How and why we use your personal data - Special category personal data**

We do not collect any special personal data, other than Equality Monitoring collected during staff onboarding.

### **Third parties**

Kids Club Kampala will not sell, trade or rent your personal contact details to any organisation. We sometimes use third-party financial institutions to process our donations. They receive the card number and other personal information only to verify and process transactions securely. We do not allow for any third parties to sell, trade or rent this data or use it for anything other than what they are contracted to do, or store the data over a long-term period.

### **Research**

We carry out research using publicly available information and expressed interests which allows our fundraising team to communicate with supporters in an individual and tailored way relating to their interests. This allows us to reduce the amount of unwanted or irrelevant communications sent to our donors.

### **Who we share your personal data with**

We routinely share personal data with:

- third parties we use to help deliver our products or services to you, eg payment service providers, warehouses and delivery companies;



- other third parties we use to help us run our business, eg marketing agencies or website hosts;
- third parties approved by you, eg social media sites you choose to link your account to or third party payment providers;
- our bank;

We only allow those organisations to handle your personal data if we are satisfied they take appropriate measures to protect your personal data. We also impose contractual obligations on them to ensure they can only use your personal data to provide services to us and to you.

We or the third parties mentioned above occasionally also share personal data with:

- our and their external auditors, eg in relation to the audit of our or their accounts, in which case the recipient of the information will be bound by confidentiality obligations;
- our and their professional advisors (such as lawyers and other advisors), in which case the recipient of the information will be bound by confidentiality obligations;
- law enforcement agencies, courts, tribunals and regulatory bodies to comply with our legal and regulatory obligations;
- other parties that have or may acquire control or ownership of our business (and our or their professional advisers) in connection with a significant corporate transaction or restructuring, including a merger, acquisition, asset sale, initial public offering or in the event of our insolvency—usually, information will be anonymised but this may not always be possible. The recipient of any of your personal data will be bound by confidentiality obligations.

We will not share your personal data with any other third party.

### **How we store your information**

Kids Club Kampala stores all information relating to individuals in a secure online cloud or on our secure online database. No personal information is stored on staff computers or external hard drives unless necessary. When this is required additional password protection is used to protect this information.

### **Where we access your data from**

Kids Club Kampala has offices in the UK and Republic of Ireland. Your data is accessed for the purposes of communicating with you from these locations. On occasion your information may be accessed by Kids Club Kampala UK and Ireland staff whilst outside of the EEA. The EEA comprises of the EU states plus Norway, Iceland and Liechtenstein. Areas outside the EEA may not have similar protections in place regarding your data. However, any use of your data outside of the EEA will be subject to Kids Club Kampala imposing appropriate safeguards. By submitting your information you are providing your consent to these transfers of your data.



## **Where your personal data is held**

Personal data may be held at our offices and may be accessed or processed by our staff members who work remotely from their homes. They are required to adhere to our data protection policies and use secure methods to access and handle personal data and those of our group companies, third party agencies, service providers, representatives and agents as described above (see above: 'Who we share your personal data with').

Some of these third parties may be based outside the UK/EEA. For more information, including on how we safeguard your personal data when this happens, see below: 'Transferring your personal data out of the UK and EEA'.

## **How long your personal data will be kept**

We will not keep your personal data for longer than we need it for the purpose for which it is used. Different retention periods apply for different types of personal data.

## **Transferring your personal data out of the UK and EEA**

The EEA, UK and other countries OR Countries outside the EEA and the UK have differing data protection laws, some of which may provide lower levels of protection of privacy.

It is sometimes necessary for us to transfer your personal data to countries outside the UK and EEA. In those cases we will comply with applicable UK and EEA laws designed to ensure the privacy of your personal data.

We will transfer your personal data to:

- our service providers located outside the UK

As we are based in the UK we will also transfer your personal data from the EEA to the UK.

Under data protection laws, we can only transfer your personal data to a country outside the UK/EEA where:

- in the case of transfers subject to UK data protection law, the UK government has decided the particular country ensures an adequate level of protection of personal data (known as an 'adequacy regulation') further to Article 45 of the UK GDPR. A list of countries the UK currently has adequacy regulations in relation to is available [here](#).
- in the case of transfers subject to EEA data protection laws, the European Commission has decided that the particular country ensures an adequate level of protection of personal data (known as an 'adequacy decision') further to Article 45 of the EU GDPR. A list of countries the European Commission has currently made adequacy decisions in relation to is available [here](#).
- there are appropriate safeguards in place, together with enforceable rights and effective legal remedies for you; or





- a specific exception applies under relevant data protection law.

Where we transfer your personal data outside the UK, we do so on the basis of an adequacy regulation or (where this is not available) legally-approved standard data protection clauses recognised or issued further to Article 46(2) of the UK GDPR. In the event we cannot or choose not to continue to rely on either of those mechanisms at any time, we will not transfer your personal data outside the UK unless we can do so on the basis of an alternative mechanism or exception provided by UK data protection law and reflected in an update to this policy.

Where we transfer your personal data outside the EEA we do so on the basis of an adequacy decision or (where this is not available) legally-approved standard data protection clauses issued further to Article 46(2) of the EU GDPR. In the event we cannot or choose not to continue to rely on either of those mechanisms at any time we will not transfer your personal data outside the EEA unless we can do so on the basis of an alternative mechanism or exception provided by applicable data protection law and reflected in an update to this policy.

Any changes to the destinations to which we send personal data or in the transfer mechanisms we rely on to transfer personal data internationally will be notified to you in accordance with the section on 'Changes to this privacy policy' below.

## Your rights

You have the following rights, which you can exercise free of charge:

Access	The right to be provided with a copy of your personal data
Rectification	The right to require us to correct any mistakes in your personal data
Erasure (also known as the right to be forgotten)	The right to require us to delete your personal data—in certain situations
Restriction of processing	The right to require us to restrict processing of your personal data in certain circumstances, eg if you contest the accuracy of the data



<p>Data portability</p>                      <p>To object</p>                      <p>Not to be subject to automated individual decision making</p>	<p>The right to receive the personal data you provided to us, in a structured, commonly used and machine-readable format and/or transmit that data to a third party—in certain situations</p>                      <p>The right to object:</p> <p>—at any time to your personal data being processed for direct marketing (including profiling);</p> <p>—in certain other situations to our continued processing of your personal data, eg processing carried out for the purpose of our legitimate interests unless there are compelling legitimate grounds for the processing to continue or the processing is required for the establishment, exercise or defence of legal claims</p>                      <p>The right not to be subject to a decision based solely on automated processing (including profiling) that produces legal effects concerning you or similarly significantly affects you</p>
<p>The right to withdraw consents</p>	<p>If you have provided us with a consent to use your personal data you have a right to withdraw that consent easily at any time</p> <p>You may withdraw consents by emailing us at <a href="mailto:info@kidsclubkampala.org">info@kidsclubkampala.org</a></p> <p>Withdrawing a consent will not affect the lawfulness of our use of your personal data in reliance on that consent before it was withdrawn</p>

For more information on each of those rights, including the circumstances in which they apply, please contact us (see ‘How to contact us’ below) or see the Guidance from the UK Information Commissioner’s Office (ICO) on individuals’ rights.

If you would like to exercise any of those rights, please:



- email, call or write to us—see below: ‘How to contact us’; and
- provide enough information to identify yourself (eg your full name, address) and any additional identity information we may reasonably request from you;
- let us know what right you want to exercise and the information to which your request relates.

### **Keeping your personal data secure**

We have appropriate security measures to prevent personal data from being accidentally lost, or used or accessed unlawfully. We limit access to your personal data to those who have a genuine business need to access it. Those processing your personal data will do so only in an authorised manner and are subject to a duty of confidentiality. We also have procedures to deal with any suspected data security breach. We will notify you and any applicable regulator of a suspected data security breach where we are legally required to do so.

If you want detailed information from Get Safe Online on how to protect your personal data and other information and your computers and devices against fraud, identity theft, viruses and many other online problems, please visit [www.getsafeonline.org](http://www.getsafeonline.org). Get Safe Online is supported by HM Government and leading businesses.

### **How to complain**

Please contact us if you have any queries or concerns about our use of your personal data (see below ‘How to contact us’). We hope we will be able to resolve any issues you may have.

You also have the right to lodge a complaint with:

- the Information Commissioner in the UK

The UK’s Information Commissioner may be contacted using the details at <https://ico.org.uk/make-a-complaint> or by telephone: 0303 123 1113.

For a list of EEA data protection supervisory authorities and their contact details see [here](#).

### **Changes to this privacy policy**

This privacy notice was published on 9th April 2018 and last updated on 4th July 2024

We may change this privacy notice from time to time—when we do we will inform you via our website.



## How to contact us

Individuals in the UK

You can contact us by post, email or telephone if you have any questions about this privacy policy or the information we hold about you, to exercise a right under data protection law or to make a complaint.

Our contact details are shown below:

Our contact details
Hope House, 148 Witton Lodge Road, Birmingham, B23 5AP  info@kidsclubkampala.org  +447971601154

## Do you need extra help?

If you would like this notice in another format (for example audio, large print, braille) please contact us (see 'How to contact us' above).

## Your rights

If you do wish to exercise any of your rights, as listed below please write to us at info@kidsclubkampala.org;

- Access to your personal information;
- Objection to processing of your personal information;
- Objection to automated decision-making and profiling;
- Restriction of processing of your personal information;
- Your personal data portability;
- Rectification of your personal information; and
- Erasure of your personal information

If you make a request relating to any of your rights listed above, we will consider each request in accordance with all applicable data protection laws and regulations. No administration fee will be charged for considering and/or complying with such a request unless the request is deemed to be excessive in nature.

Upon successful verification of your identity you are entitled to obtain the following information about your own personal information:



- The purposes of the collection, processing, use and storage of your personal data. The source(s) of the personal information, if it was not obtained from you.
- The categories of personal data stored about you.
- The recipients or categories of recipients to whom your personal data has been or may be transmitted, along with the location of those recipients.
- The envisaged period of storage for your personal data or the rationale for determining the storage period.
- The use of any automated decision-making and/or profiling.

You can make the above request by emailing us at [info@kidsclubkampala.org](mailto:info@kidsclubkampala.org).

### **Get in touch**

We strive to be transparent and open and of course we couldn't carry out our vital work without the financial backing of our supporters. If you wish to discuss any of this further, please do not hesitate to get in touch with us.