

# Privacy Policy of Nsumbi Trust



## 1. Scope

This notice applies to everyone whose personal data is held by Nsumbi Trust.

## 2. Responsibilities

The Nsumbi Trust trustees are responsible for ensuring that all potential data subjects have sight of this notice prior to the collection and/or processing of their personal data by Nsumbi Trust.

All employees or volunteers working on behalf of Nsumbi Trust who interact with data subjects are also required to ensure that this notice is brought to the attention of all data subjects, securing their consent for the processing of their personal data.

## 3. Fair Processing Notice

Nsumbi Trust will use the personal data collected from you for providing information on our activities and events and for fundraising purposes.

You hereby confirm that you are consenting to Nsumbi Trust's use of your personal data for the aforementioned purposes(s) and are granting Nsumbi Trust permission to carry out those actions and/activities.

You may withdraw your consent by emailing: [info@nsumbi.org](mailto:info@nsumbi.org) at any time and you will be immediately withdrawn from all of our contact lists.

Please note that your personal information may be used to provide information on our activities and fundraising. This is not obligatory, and you may opt out by emailing [info@nsumbi.org](mailto:info@nsumbi.org) requesting that your personal information be removed. You may also unsubscribe at any time, by selecting the unsubscribe option.

We may store your data in a third party application, where this is a secure means of keeping your personal data safe. We will never share your data with a third party organisation for any other purposes without your express consent.

## 4. What is Personal Data?

The EU's General Data Protection Regulation ("GDPR") defines "personal data" as: *"any information relating to an identified or identifiable natural person ('data subject'); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person"*.

The GDPR requires that consent is provided by the data subject for all types of personal data, including those pertaining to the special categories set out above and otherwise.

When Nsumbi Trust requests sensitive data from data subjects, it is required to confirm why the information is required and how it will be used.

## **5. Why does Nsumbi Trust need to collect and store personal data?**

Nsumbi Trust is committed to ensuring that all personal information collected and processed is appropriate for the stated purpose(s) and shall not constitute an invasion of your privacy. We may share your personal data with third party service providers who are contracted by us and we shall ensure that they will hold your personal data securely and shall use it only in order to fulfil the service for which they are contracted. When there is no longer a service need, or the contract comes to an end, the third party will dispose of all personal data according to our procedures. We will never share your personal data with third parties until we have received your consent, unless we are required do so by law.

## **6. How Nsumbi Trust uses your information**

Nsumbi Trust will process your data (i.e. collect, store and use) according to the requirements of the GDPR at all times and shall endeavour to keep your personal data up-to-date, ensuring its accuracy and will not keep it for longer than it is required. In some situations, there are set legal requirements for the length of time that Nsumbi Trust will retain your personal data but usually Nsumbi Trust will use its discretion, ensuring that personal data is not kept outside of our usual business requirements.

We shall never be intrusive or invasive of your personal privacy and shall not ask you to provide data that is irrelevant or unnecessary and we will enact strict measures and processes to ensure that the risk of unauthorised access or disclosure of your personal data is minimised as much as possible.

We will only use your personal data for providing information on our activities and events and for fundraising.

## **7. Your rights in relation to your data**

We generally only hold your personal details to keep informed you of our projects and activities. Exceptionally, we may need to hold other details. This will be for a specified purpose and the reason and extent of this will be made clear to you.

You have a right to ask us to stop processing your personal data, and you have a right to ask to access your personal data and to obtain certain information out of it. If there are any discrepancies in the information we provide, please let us know and we will correct them.

If you wish to ask what data we have about you, please write to us at Nsumbi Trust, PO Box 174, Sevenoaks TN13 9AS and we will send you a Subject Access Request form to enable you to find out what information we hold about you.

In some circumstances, such as when the data is no longer required or if the use of the data has no legal justification, you have the right to have that data erased, as well as the right to object to our handling of your data.

You have the right to withdraw your consent at any time when we rely on consent as a legal ground to justify our handling of your personal data. This would not affect the lawfulness of anything done before consent is withdrawn but it would stop us from continuing to use the relevant information.

You also have the right to lodge a complaint with the Information Commissioner's Office about how we manage your data.

Nsumbi Trustees

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