



BACKUP UGANDA

Privacy Policy

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Introduction

This Privacy Policy has been designed in response to the General Data Protection Regulation coming into force on 25 May 2018. The Policy is to be implemented by all employees, volunteers and directors of the organization. It is leading in all situations where personal data of citizens of the European Union are collected and saved.

All workers at all levels are expected to familiarize themselves with this Privacy Policy and stay informed about possible amendments. Amendments will be communicated by the Uganda Country Director and/or the Board President. The Policy is not to be photocopied or distributed in any other way unless the Country Director and/or the Board President has given prior approval.

Access to the Privacy Policy

- This Privacy Policy is to be shared with all employees, volunteers and directors of the organization;
- The Policy is to be accessible through the organization's website as well. The file is to be available there and is to be explained in understandable terms in the form of a privacy statement. All this is to be available on a specific Privacy Page;
- The Policy is to be shared with everyone who signs up for the newsletter, through a reference to the Privacy Page on the organization's website;
- Donors who make direct donations to a bank account belonging to Backup Uganda are to be informed about the Privacy Page through email when possible. The same goes for donors who enter an ANBI agreement;
- Changes in the way we do our work that have an effect on the way we handle personal data are to be included in this Privacy Policy immediately, and are to be communicated to everyone involved through the organization's website, social media pages and email.

Collecting and saving personal data

- Personal data of EU citizens are only allowed to be collected and saved by the organization when related to sending newsletters and receiving donations;
- Personal data are only to be collected and saved when reasonable or necessary to achieve the goal of interaction with the organization;
- No data beyond basic personal information is allowed to be collected and saved;
- Personal data are only to be saved when these are shared with the organization of own accord;
- Personal data are to be kept by the organization for a maximum of 5 years, unless the person involved requests to remove these earlier.

Through MailChimp:

- Through Mailchimp, at subscription it is allowed to collect and save at minimum an email address and at maximum a name and email address;

- These date are to be used for sharing the monthly newsletter only;
- Backup Uganda and MailChimp have signed a data processing agreement to protect the data saved.

Through GlobalGiving:

- When making a donation, GlobalGiving requests for specific personal information and stores these;
- GlobalGiving is solely responsible for saving and protecting its users' personal data;
- GlobalGiving offers the possibility to make an anonymous donation - Backup Uganda workers are to refer to this option when requested for by a donor;
- Backup Uganda has - when shared - access to names and email addresses of donors. These are to be used solely to thank donors for their donations and to share a quarterly update on the project that was donated to.

Through other donations:

- Personal data of donors who make direct donations to a bank account owned by Backup Uganda are allowed to be kept by the organization - name and, when possible, email address only;
- These data are to be used solely to thank donors and to update them on possible new campaigns;
- When entering an ANBI agreement, the personal data that are provided by the donor in writing are kept by the Treasurer of Backup Uganda's Board.

Through the website:

- Backup Uganda's website does not automatically collect data from visitors, cookies are not to be used.

Protecting personal data

- All collected personal data are to be stored and protected by the Uganda Country Director and the Treasurer;
- Personal data are not to be kept in an online environment, unless it is part of a service being used (i.e. GlobalGiving, MailChimp);
- Personal data are to be kept in encrypted files, solely on computers used by the Uganda Country Director and the Treasurer;
- At all times a backup of all files with personal data are to be kept on an encrypted external storage device;
- Files with personal data are generally not to be printed. In case this is necessary, these documents are to be kept in files that are solely accessible to the Uganda Country Director and/or the Treasurer;
- Written ANBI agreements are to be kept in a file that is solely accessible to the Treasurer;
- Passwords that give access to files with personal data are to be chosen with care and changed regularly;
- A data processing agreement is to be signed with MailChimp and implemented related to the processing of personal data that are used for sharing the monthly newsletter;
- Donors are to be informed that personal data shared through GlobalGiving fall within GlobalGiving's responsibilities;



Gulu, Uganda / Zwolle, The Netherlands

E-mail: info@backupuganda.org

Web: www.backupuganda.org

Tel: UG +256 7 72630078 NL +31 38 4604615

- Personal data are allowed to be kept for as long as needed to maintain a specific interaction between the person involved and the organization. When this interaction ends, the personal data are allowed to be kept for a maximum of 5 years, unless the person involved requests for a removal of the data earlier;
- In case of a data breach that includes the likelihood of unauthorized individuals being able to access personal data, the Dutch Data Protection Authority is to be informed within 72 hours. All individuals who are possibly involved are to be informed as well.

Adjusting (the use of) personal data

- Individuals have the right to access their personal data kept by the organization at all times;
- Individuals have the right to adjust their personal data at all times;
- Individuals have the right to request the organization to no longer use and/or keep their personal data at all times. A request like this is to be implemented immediately;
- Changes in (the use of) personal data are to be communicated through info@backupuganda.org;
- Unsubscribing to the newsletter is to be done through the link at the bottom of the most recent newsletter;
- Complaints about the way the organization is handling personal data are to be taken up immediately. Individuals are requested to share such complaints through info@backupuganda.org. In addition, individuals have the right to file a complaint with any authority that is authorized to receive such complaints.