



Nos Vies en Partage
f o u n d a t i o n
S H A R I N G P R O S P E R I T Y

DATA PROTECTION POLICY

This is a template Data Protection Policy for use by the board members and representatives of the Nos Vies en Partage Foundation (“the Foundation”). It is intended to be taken as a starting point and adapted to suit the Foundation’s circumstances.

Whilst every effort has been made to ensure that the content is accurate and up to date, the Foundation, does not warrant, nor accept any liability or responsibility for the completeness or accuracy of the content, or for any loss which may arise from reliance on this template or any information contained therein.

Data Protection policy – Key details

- Policy prepared by: Philippe Lietard
- Approved by the Board : June 2018
- Next review date : June 2019

Introduction

In order to operate, Nos Vies en Partage Foundation needs to gather, store and use information about individuals and charitable organizations..

These can include members, employees, contractors, suppliers, volunteers, audiences and potential audiences, business contacts and other people the Foundation has a relationship with or regularly needs to contact.

This policy explains how this data should be collected, stored and used in order to meet Nos Vies en Partage Foundation’s data protection standards and comply with the relevant law.

Why is this policy important?

This policy ensures that the Nos Vies en Partage Foundation:

- Protects the rights of its board members, volunteers and supporters
- Complies with the data protection law and follows best practice
- Protects the Foundation from risks of a data breach

Roles and responsibilities

Who and what does this policy apply to?

This applies to all those handling data on behalf of the Nos Vies en Partage Foundation, e.g.:

- Board members
- Employees and volunteers
- Members
- Contractors/3rd-party suppliers

It applies to all data that the Nos Vies en Partage Foundation holds relating to individuals and charitable organizations, including:

- Names
- Email addresses
- Postal addresses
- Phone numbers
- Any other personal information held (e.g. financial)

Roles and responsibilities

Everyone who has access to data as part of the Nos Vies en Partage Foundation has a responsibility to ensure that they adhere to this policy.

Data controller

The Data Controller for the Nos Vies en Partage Foundation is Mrs Rachael Sale. She, together with the board members, are responsible for why data is collected and how it will be used. Any questions relating to the collection or use of data should be directed to the Data Controller.

Data protection principles

1. We fairly and lawfully process personal data

Nos Vies en Partage Foundation will only collect data where lawful and where it is necessary for the legitimate purposes of the Foundation.

- A board member's Know Your Client will be collected when they are first appointed to the Foundation, and this data will be used to contact the member regarding board meetings and the administration of the Foundation. Other data may also subsequently be collected in relation to their directorship, including a certified copy of the individual's passport.
- The name and contact details of volunteers, committee members, employees and contractors will be collected when they make donations to the Foundation. Further information, including personal financial information and criminal records information may also be collected in specific circumstances where lawful and necessary (in order to process payment to the person or in order to carry out a DBS check).
- An individual's name, contact details and other details may be collected at any time, with their consent, in order for the Nos Vies en Partage Foundation to communicate with them about fund raising activities, and/or for Direct Marketing. See 'Direct Marketing' below.

2. We only collect and use personal data for specified and lawful purposes

When collecting data, the Nos Vies en Partage Foundation will always explain to the subject why the data is required and what it will be used for, e.g.

"Please enter your email address in the form below. We need this so that we can send you email updates for group administration including meetings, fund raising events, donations proposed and made together with updates on charities and other business."

We will never use data for any purpose other than that stated or that can be considered reasonably to be related to it. For example, we will never pass on personal data to 3rd parties without the explicit consent of the subject.

3. We ensure any data collected is relevant and not excessive

The Foundation will not collect or store more data than the minimum information required for its intended purpose.

E.g. we need to collect telephone numbers from members in order to be able to contact them about fund raising events and collection of donations, but data on their marital status or sexuality will *not* be collected, since it is unnecessary and excessive for the purposes of the Foundation.

4. We ensure data is accurate and up-to-date

The Foundation will ask members, volunteers and staff to check and update their data on an annual basis.

Any individual will be able to update their data at any point by contacting the Data Controller.

5. We ensure data is not kept longer than necessary

The Foundation will keep data on individuals for no longer than 12 months after our involvement with the individual has stopped, unless there is a legal requirement to keep records.

6. We process data in accordance with individuals' rights

The following requests can be made in writing to the Data Controller:

- Members, volunteers and supporters can request to see any data stored on about them. Any such request will be actioned within 14 days of the request being made.
- Members and supporters can request that any inaccurate data held on them is updated. Any such request will be actioned within 14 days of the request being made.
- Members and supporters can request to stop receiving any marketing communications. Any such request will be actioned within 14 days of the request being made.
- Members and supporters can object to any storage or use of their data that might cause them substantial distress or damage or any automated decisions made based on their data. Any such objection will be considered by the boards, and a decision communicated within 30 days of the request being made

7. We keep personal data secure

The Foundation will ensure that data held is kept secure.

- Electronically-held data will be held within a password-protected and secure environment
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- Passwords for electronic data files will be re-set each time an individual with data access leaves their role/position
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- Physically-held data (e.g. know your client documentation) will be stored in a locked cupboard
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- Keys for locks securing physical data files should be collected by the Data Controller from any individual with access if they leave their role/position. The codes on combination locks should be changed each time an individual with data access leaves their role/position
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- Access to data will only be given to relevant trustees/committee members/contractors where it is clearly necessary for the running of the group. The Data Controller will decide in what situations this is applicable and will keep a master list of who has access to data
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8. Transfer to countries outside the EEA

The Foundation will not transfer data to countries outside the European Economic Area (EEA), unless the country has adequate protection for the individual (e.g. USA).

Member-to-member contact

We only share members' data with other members with the subject's prior consent

As a Foundation, Nos Vies en Partage Foundation encourages communication between board members and members of the Randgold Group.

To facilitate this:

- Members can request the personal contact data of other members in writing via the Data controller or Secretary. These details will be given, as long as they are for the purposes of contacting the subject (e.g. an email address, not financial or health data) and the subject consents to their data being shared with other members in this way

Direct Marketing

The Foundation will regularly collect data from consenting supporters for marketing purposes. This includes contacting them to promote fundraising events, updating them about group news, and other group activities.

Any time data is collected for this purpose, we will provide:

- A clear and specific explanation of what the data will be used for (e.g. *'Tick this box if you would like Nos Vies en Partage Foundation to send you email updates with details about our forthcoming events, fundraising activities and opportunities to get involved'*)
- A method for users to show their active consent to receive these communications (e.g. a 'tick box')

Data collected will only ever be used *in the way described and consented to* (e.g. we will not use email data in order to market 3rd-party products unless this has been explicitly consented to).

Every marketing communication will contain a method through which a recipient can withdraw their consent (e.g. an 'unsubscribe' link in an email). Opt-out requests such as this will be processed within 14 days.

Cookies on Nos Vies en Partage Foundation Website

A cookie is a small text file that is downloaded onto 'terminal equipment' (e.g. a computer or smartphone) when the user accesses a website. It allows the website to recognise that user's device and store some information about the user's preferences or past actions.

Nos Vies en Partage Foundation uses cookies on our website <http://partage-foundation.org/> in order to monitor and record their activity. This allows us to improve users' experience of our website by, for example, allowing for a 'logged in' state, and by giving us useful insight into how users as a whole are engaging with the website.

We will implement a pop-up box on <http://partage-foundation.org/> that will activate each new time a user visits the website. This will allow them to click to consent (or not) to continuing with cookies enabled, or to ignore the message and continue browsing (i.e. give their implied consent).

It will also include a link to our Privacy Policy which outlines which specific cookies are used and how cookies can be disabled in the most common browsers.