



Mbwa Wa Africa Animal Rescue, Friends of Mbwa Wa Africa Animal Rescue, Tierhilfe Tansania e.V.

Data Protection Policy

As the below policy will be for Mbwa Wa Africa Animal Rescue, the Friends of Mbwa Wa Africa Animal Rescue and Tierhilfe Tanzania e.V. the term "we" or "us" or "our" will be used and cover all three organisations

Policy statement

We are committed to a policy of protecting the rights and privacy of individuals, volunteers, staff and others in accordance with General Data Protection Regulation 2016 (GDPR).. The policy applies to all supporters and staff involved with us. Any breach of GDPR or our Data Protection Policy is considered to be an offence and, in that event, disciplinary procedures apply.

As a matter of good practice, other organisations and individuals working with one of the organisations, and who have access to personal information, will be expected to have read and comply with this policy. It is expected that any staff who deal with external organisations will take responsibility for ensuring that such organisations sign a contract agreeing to abide by this policy.

Legal Requirements

Data is protected by GDPR, which came into effect on 25th May 2017. Its purpose is to protect the rights and privacy of individuals and to ensure that personal data is not processed without their knowledge, and, wherever possible, is not processed without their consent.

The Act requires us to register the fact that they hold personal data and to acknowledge the right of 'subject access' – supporters and staff must have the right to access copies of their own data.

Managing Data Protection

We will ensure that their details are registered with the Information Commissioner.

Purpose of data held by the Charity

We will only ever collect the information they need – including data that will be useful to help improve their services. They collect two kinds of information:

- Mbwa Wa Africa is a registered Non Governmental Organisation (NGO) in Tanzania with Reg. No. I-Ngo/R2/000638
- Friends of Mbwa Wa Africa Animal Rescue is Scottish registered charity with Charity No:SC045521
- Tierhilfe Tanzania is a registered Society with the Vereinsregister Amtsgericht Bielefeld, No. 4630



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- non-personal information such as IP addresses (the location of the computer on the internet), pages accessed and files downloaded. This helps us to determine how many people use their sites, how many people visit on a regular basis, and how popular their pages are. This information does not tell us anything about who you are or where you live. It simply allows us to monitor and improve our service.
- personal information such as name, postal address, phone number, email address, date of birth (where appropriate), qualifications, memberships, information about your interests and hobbies etc.

We collect this information in connection with specific activities, such as newsletter requests, registration or membership requests, feedback, donations, competition entries etc. The information is either needed to fulfil your request or to enable us to provide you with a more personalised service. You don't have to disclose any of this information to browse the sites. However, if you do choose to withhold requested information, we may not be able to provide you with certain services.

Data is collected and used by us for the following purposes:

1. Staff Administration
2. Fundraising
3. Processing Volunteer Enquiries
4. Health & Safety Compliance
5. Accounts & Records
6. Marketing & Public Relations
7. Information and Database Administration

Children's data

Some of the services we offer are aimed specifically at children and to deliver these services safely it is necessary for us to collect data and store it on our database. Before we collect data from anyone under 18 they will always ask them to:

- obtain the permission of a parent or guardian before registering with us, and
 - let an adult know before they want to obtain information about fundraising, campaigning or supporting our work.
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It is our policy not to request donations or subscriptions, or accept product orders, from children under 18.

All updates via email will be sent to the child's parent or guardian to pass on to children under the age of 18

Social media sites

We operate a number of social media pages (including Facebook, Twitter, Pinterest, YouTube and Instagram). Although this policy covers how we will use any data collected from those pages it does not cover how the providers of social media websites will use your information. Please ensure you read the privacy policy of the social media website before sharing data and make use of the privacy settings and reporting mechanisms to control how your data is used.

Data Protection Principles

In terms of GDPR, we are the 'data controller', and as such determine the purpose for which, and the manner in which, any personal data is, or will be, processed. We must ensure that they have:

1. Fairly and lawfully processed personal data

- They will always put the organisation logo on all paperwork
- They will state their intentions on processing the data and if, and to whom, they need to share this data with other organisations.
- WE will keep dormant data for 5 years or until advised by the supporters or staff that they no longer wish for US to hold their data.
- We will ensure that none of their data is passed on to third parties for marketing purposes.

2. Processed for limited purpose

- They will not use data for a purpose other than those agreed by data subjects.
 - If the data held by us is requested by external organisations for any reason, this will only be passed if data subjects agree.
 - If data has to be accessed by external organisations they will supply them with an SOP which they will sign to say they comply with the data protection laws and ensure they
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agree not to copy the data for further use and sign a contract agreeing to abide by GDPR and the our Data Protection Policy. Data will only be sent to external organisations for administrative purposes.

3. Adequate, relevant and not excessive

- We will only contact supporters with information relevant to their stating preferences.
- We will monitor the data held for our purposes, ensuring we hold correct details in respect of the individuals about whom the data is held.
- We will not keep information that is not relevant to our charitable purposes.

4. Accurate and up-to-date

- We will make sure all data is kept up to date and relevant for purpose.
- We will make sure that all amendments to personal data will be made immediately and data no longer required will be deleted or destroyed.
- It is the responsibility of individuals and organisations to ensure the data held by us is accurate and up-to-date.
- Individuals should notify us of any changes, to enable personnel records to be updated accordingly.
- Supporters can update their preferences at any time by emailing us at jens@mbwa-wa-africa.or.tz or contacting us via +255 623 910 737

5. Not kept longer than necessary

We will not keep data for longer than it is required. All personal data will be deleted or destroyed by us after five years of dormancy.

6. Processed in accordance with the individual's rights

We have a CRM system so that personal information is kept up to date and is easily accessible. All individuals that the charity hold data on have the right to:

- Be informed upon request of all the information held about them within 30 days.
- Prevent the processing of their data for the purpose of direct marketing.
- The removal and correction of any inaccurate data about them.

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7. Secure

- Appropriate technical and organisational measures shall be taken against unauthorised or unlawful processing of personal data and against accidental loss or destruction of data.
- All charity computers will have a log in system and the Contact Database is password protected, which allow only authorised staff to access personal data. Passwords on all computers are changed frequently.
- We is working towards becoming a paperless office. All data will only be printed if necessary and will be destroyed after four years or before if no longer required.
- All printed personal and financial data is kept in a locked filing cabinet and can only be accessed by the authorised staff.
- When staff members are using the laptop computers out of the office care should always be taken to ensure that personal data on screen is not visible to strangers.
- When staff have laptops, USB or other data on their person outside of the office it is their responsibility to comply with data protection policy. If there is a breach in data protection, it is the responsibility of the staff members involved to follow the appropriate measures set out by us as above
- If emails are accessible on personal devices, those devices must be kept password protected.
- Email accounts must not be linked with their personal accounts.
- If our supporters have any complaints about the use and security of their data, they can contact the via email jens@mbwa-wa-africa.or.tz. All complaints will be dealt with as quickly as possible.

8. Data will not be sent outside the European Economic Area unless they are a used by the Mbwa Wa Africa Animal Rescue in Tanzania office or affiliated organisation

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- We have measures in place to ensure that all our offices and affiliated organisations outside the European Economic Area have signed an SOP to ensure that they are in line with our data protection policies. It is the responsibility of us and our international offices to uphold these policies.
- Your data will only be transferred to countries outside the European Economic Area other than our Tanzania office for administrative purposes and with the explicit consent of the individual.
- We take particular care to be aware when publishing information on the Internet, which can be accessed from anywhere in the globe. This is because transfer includes placing data on a web site that can be accessed from outside the European Economic Area.

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