

PRIVACY POLICY

1. Introduction and general terms

Transparency International UK, (from herein referred to as TI-UK), and the people we seek to benefit, are dependent on the generosity of our supporters as well as the goodwill and trust of the public. We are therefore committed to protecting any personal information we obtain about you, whether you are just visiting our website or are a financial supporter, volunteer or campaigner. This Privacy Policy sets out how we obtain, use and protect any personal information you provide to us, whether online, via phone, text, email, in letters or in other correspondence.

This privacy policy explains the following:

- What information TI-UK may collect about you;
- How TI-UK will use information we collect about you;
- When TI-UK may use your details to contact you;
- Whether TI-UK will disclose your details to anyone else;
- Your choices regarding the personal information you provide to us;

TI-UK is committed to safeguarding your personal information. Whenever you provide such information, we are legally obliged to use your information in line with all laws concerning the protection of personal information, including the Data Protection Act 1998 and the Privacy & Electronic Communications (EC Directive) Regulations 2003.

The TI-UK website contains hyperlinks to websites owned and operated by third parties. These third party websites have their own privacy policies, including policies on their use of cookies, and we urge you to review them. They will govern the use of personal information you submit or which is collected by cookies whilst visiting these websites. We cannot accept any responsibility or liability for the privacy practices of such third party websites and your use of such websites is at your own risk.

2. Who we are

TI-UK is a registered charity (charity number 1112842) and a company limited by guarantee (company number 2903386). TI-UK's registered address is 7-14 Great Dover Street, London SE1 4YR.

TI-UK is an affiliate member of the TI movement. This Privacy Policy relates to information which is obtained by TI-UK and not by other entities in the Transparency International movement.

3. Why do we hold and process your data?

We hold and process your data for a number of reasons:

- To keep a record of donations made by our supporters
- To claim gift aid on donations
- To send our supporters marketing information about our projects and fundraising activities where we have their consent or are otherwise allowed to
- To fulfil contractual obligations entered into with supporters
- To record campaigning actions by supporters
- To ensure we do not send unwanted information to supporters or members of the public who have informed us they do not wish to be contacted

4. What information will TI-UK collect about me?

When you contact TI-UK, either online or by any other means, such as newsletters, competitions, or message boards, or you telephone, email, write to or text TI-UK, or engage with TI-UK via social media channels, we may receive and retain personal information about you. This can consist of information such as your name, email address, postal address, telephone or mobile number, bank account details to process donations and whether or not you are a tax payer so that we can claim Gift Aid.

By submitting your details, you enable TI-UK to raise funds and to provide you with the goods, services, information, activities or online content you select.

We do not usually collect “sensitive personal data” about our supporters, e.g. health status, unless there is a clear reason for doing so - such as to ensure that we provide appropriate facilities or support to enable you to participate in an event. Clear notices will be provided on applications for such events so that it is clear what information we need and why we need it. If you are simply browsing our website as an anonymous visitor, TI-UK may still collect certain information from you, such as your IP addresses (an IP address is a number that can uniquely identify a specific computer or other network device on the internet).

TI-UK may also use publicly available information to undertake due diligence prior to accepting donations (in line with TI-UK’s Donations Policy), including by using a third party intermediary if necessary, and to identify people who express an interest in giving major gifts to organisations like TI-UK, or who may be interested in a high profile public association with TI-UK. This information may include newspaper or other media coverage, open postings on social media sites such as LinkedIn, and data from Companies’ House. Where an individual enters into such a relationship with TI-UK they will have a nominated account manager who will agree with the individual any sensitivities they may have with regard to any personal information which TI-UK may hold on them.

If you enter your contact details in one of our online forms, we may use this information to contact you even if you don’t “send” or “submit” the form. We will only do this to see if we can help with any problems you might be experiencing with the form or with our websites.

TI-UK also uses cookies. Cookies are small text files on your device. They are made by your web browser when you visit a website. Every time you go back to that website, your browser will send the cookie file back to the website’s server. They improve your experience of using a website, for example, by remembering your preference settings and by measuring your use of a website to ensure that it meets your needs.

5. How and when will TI-UK use the information you collect about me?

TI-UK may collect your personal data in the following circumstances:

i. When you give it to us directly

You may give us your personal data directly when you make a donation, sign up for one of our events or communicate with us

ii. When you give it to us indirectly

You may give us your information indirectly when you sign up to events or contribute to TI-UK via fundraising sites like Just Giving. These independent third parties will pass your data to TI-UK where you have indicated that you wish to support TI-UK and have given your consent or it is a necessary part of completing a contract with you.

iii. When you access TI-UK Social Media

We might also obtain your personal data through your use of social media such as Facebook, WhatsApp or Twitter depending on your settings or the privacy policies of these social media and messaging services. To change your settings on these services, please refer to their privacy notices, which will tell you how to do this.

iv. When the information is publicly available

We might also obtain personal data about individuals who may be interested in giving major gifts to charities or organisations like TI-UK. In this scenario, TI-UK may seek to find out more about these individuals, their interests and motivations

for giving through publicly available information. This information may include newspaper or other media coverage, open postings on social media sites and data from Companies House. TI-UK will not retain publicly available data relating to major donors without their consent, which will be sought at the earliest practical opportunity.

v. When we use cookies

Please refer to section 11 of this paper that explains further TI-UK's privacy policy relating to cookies.

TI-UK will use your personal information for a number of purposes including the following:

- in relation to any correspondence you have entered into with us whether by letter, email, text, social media, message board or any other means;
- for "service administration purposes", which means that TI-UK may contact you for reasons related to donations you have made such as your tax status with regard to Gift Aid, the completion of commercial or other transactions you have entered into with TI-UK or the activity or online content you have signed up for;
- for internal record keeping;
- to fulfil contracts you have entered into with TI-UK;
- to contact you about any content you provide;
- to invite you to participate in surveys or research about TI-UK or our work (participation is always voluntary);
- for marketing purposes where you have specifically consented to receive marketing communications from us;
- to provide you with information about our activities or online content you have agreed to receive;
- to personalise the way TI-UK content is presented to you;
- to use IP addresses to identify the location of users, to block disruptive use, to establish the number of visits from different countries;
- to analyse and improve the activities and content offered by the TI-UK website to provide you with the most user-friendly navigation experience. We may also use and disclose information in aggregate (so that no individuals are identified) for marketing and strategic development purposes.

6. Will I be contacted for marketing purposes?

TI-UK will only contact you for marketing purposes where you have provided us with freely given consent to do so. You may provide that consent in various ways including through online or paper forms (where consent statements are clearly visible) or through face to face or telephone engagement with our staff or representatives.

Please see section 10 below for information on how to change your communication preferences, including opting out of future marketing communications.

7. Will TI-UK share my personal information with anyone else?

We will only use your information within TI-UK for the purposes for which it was obtained. TI-UK will not, under any circumstances, share or sell your personal data with any third party for marketing purposes and you will not receive offers from other companies or organisations as a result of giving your details to us.

We may need to share your information with "data processors" such as our service providers, associated organisations and agents who help us to prepare and send the materials relating to our projects and fundraising activities. These "data processors" will only act under our instruction and we will not allow these organisations to use your data for their own purposes and will take care to ensure that they keep your data secure.

We will also comply with legal requests where disclosure is required or permitted by law (for example to government bodies for tax purposes or law enforcement agencies for the prevention and detection of crime, subject to such bodies providing us with a relevant request in writing).

8. Offensive or inappropriate content placed on the TI-UK website

If you post or send offensive, inappropriate or objectionable content to or anywhere on the TI-UK website or otherwise engage in any disruptive behaviour on any TI-UK service, we may use your personal information to stop such behaviour.

Where TI-UK reasonably believes that you are or may be in breach of any of the laws of the United Kingdom (e.g. because content you have posted may be defamatory), we may use your personal information to inform relevant third parties such as your employer, internet provider or law enforcement agencies about the content and your behaviour.

9. How long will TI-UK keep my personal information?

Where you give us your consent to send marketing information, we will wherever possible let you know how long this consent will last. Unless we have grounds for believing that a longer period is reasonable and have explained this to you, we will understand your consent to last for 6 years since you last make contact with us. After this time, in order for us to continue to update you, we will need your refreshed consent. You can update or withdraw your consent at any time, for individual channels of communication, or for all channels.

If you request that we stop sending you marketing materials we will keep a record of your contact details and appropriate information to enable us to comply with your request not to be contacted by us.

Management of legacy information is of a long term nature. We may keep data relating to a legacy that you provide to us indefinitely, to carry out legacy administration and communicate effectively with the families of people leaving us legacies. This also enables us to identify and analyse the source of legacy income we receive.

Where you contribute material to us, e.g. user generated content or in response to a particular campaign we will generally only keep your content for as long as is reasonably required for the purpose for which it was submitted unless otherwise stated at the point of generation.

In certain instances, for statutory purposes, it will be necessary for TI-UK to hold information for a longer period due for statutory purposes. For example, we need to hold donation records for up to seven years. In these cases we will endeavour to only hold information for as long as required for the particularly statutory purpose.

10. What is TI-UK's policy on allowing me to update, correct, or delete my personal information?

The accuracy of your information is really important to us. We want to ensure that we are able to communicate with you in ways that you are happy with, and to provide you with information that is of interest. If you wish to change how we communicate with you, or update the information we hold, then please contact us:

- email us at info@transparency.org.uk
- write to us at:
Data Protection Officer,
Transparency International UK,
7-14 Great Dover Street,
London SE1 4YR

You may also opt out of marketing emails at any time by clicking the unsubscribe link in any marketing email from TI-UK. Under the Data Protection Act you have the right to request a copy of the personal information we hold about you and to have any inaccuracies corrected. We will endeavour to provide you with this information within 2 weeks of receiving your request.

11. Cookies Policy - information TI-UK collects from your computer or mobile device

a. What is a cookie?

Cookies are small text files on your device. They are made by your web-browser when you visit a website. Every time you go back to that website, your browser will send the cookie file back to the website's server. Cookies are useful because they allow a website to recognise a user's device.

Cookies do lots of different jobs, like letting you navigate between pages efficiently, remembering your preferences, and generally improving the user experience.

They can also help to ensure that adverts you see online are more relevant to you and your interests.

b. Why does TI-UK use cookies?

Like many websites, TI-UK uses cookies in order to provide you with a more personalised web service. Cookies help us identify which bits of our website people are using, and help us do work on those sections of the website to improve the user experience. We also use cookies to help show content on our site which is relevant to you and your interests, for example if on a previous visit you went to our pages about research, business integrity or events, we might find this out from your cookie and show you other information on our website related to research, business integrity or events on subsequent visits.

Information supplied in cookies also allows us to measure the effectiveness of online marketing campaigns for TI-UK. This enables us to ensure any money we spend on digital marketing gives us a good return on investment.

12. Changes to TI-UK's Privacy Policy

This Privacy Policy may be updated from time to time so you may wish to check it each time you submit personal information to TI-UK. The date of the most recent revisions will appear on this page. If you do not agree to these changes, please do not continue to use the TI-UK website to submit personal information to TI-UK. If material changes are made to the Privacy Policy we will notify you by placing a prominent notice on the website.

Policy Revision Approved 21st May 2018