Practical Action Group Privacy Information

Here at the Practical Action Group, we are committed to protecting your privacy. Please read this policy which, together with our <u>websites and cookies policy</u>, explains how we collect, manage, use and protect your personal information.

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Who we are

Practical Action Group consists of the charity Practical Action as well as its subsidiaries Practical Action Consulting and Practical Action Publishing.

We have branch offices in locations across the world as well as associations with two locally-registered overseas entities carrying the Practical Action name.

Our vision

Our vision is for a world where every person is free of poverty, where all people have access to the technologies that enable them to meet their basic needs and their potential, in a way that safeguards the planet today, and for future generations.

Our details

Practical Action is a charitable company limited by guarantee

Company number: 871954 Charity number: 247257

ICO registration number: Z5436783

Practical Action Publishing is a wholly owned publishing subsidiary and trades only in

support of its parent charity objectives

Practical Action Publishing Ltd, Company number: 1159018

ICO registration number: Z5816668

Practical Action Consulting is a wholly owned subsidiary of Practical Action and trades only

in support of its parent charity objectives

Practical Action Consulting Ltd, Company number: 952750

ICO registration number: Z581661X

Data sharing agreements are in place between the entities within Practical Action Group, and are operating under one Data Protection Policy and other risk and information management policies.

Contacting us

If you would like to make an enquiry about data protection, update the information we hold about you, request or opt out of receiving marketing communications from Practical Action or subsidiary companies, or change the way we process your information, you can let us know in the following ways:

Email: myprivacy@practicalaction.org.uk

Post: Supporter Services, Practical Action, The Schumacher Centre, Bourton On Dunsmore,

Rugby, CV23 9QZ Phone: 0800 389 1624 If you would like to make a request to access the information we hold about you see <u>'Your rights'</u> section at the end of this document. To make a complaint about how your personal information has been used; please write to us at:

Post: Data Protection, Practical Action, The Schumacher Centre, Bourton On Dunsmore, Rugby, CV23 9QZ

Email: myprivacy@practicalaction.org.uk

More information about our complaints process can be <u>found here</u>. Alternatively, you are entitled to raise a concern to the <u>Information Commissioner's Office (ICO)</u> without first referring your complaint to us. <u>See here for more information</u>.

What information we collect about you

Personal information is collected directly from you when you interact with the Practical Action Group, for example making a donation, purchasing a gift, sending or receiving an email, making an enquiry, visiting our websites, applying for a role or consultancy post with us, participating in an event or when signing-up to a campaign or for our newsletters. Practical Action Publishing in addition collect information directly from you when you submit a proposal, purchase products, or register an account on our publishing websites. We may also receive information about you from other sources (including public sources). This is explained in the 'How we might use your information' section below.

Information may be collected in person, over the phone, through our websites, social media, or from something you've posted to us.

The information we hold will typically include some, or all of, your name, postal and email addresses, and your phone number. It may include information like your date of birth and your bank or other financial details if you are supporting us or making payment for products or services. Credit or debit card details are not retained after payment is processed. Practical Action Publishing collects product download information. Practical Action Consulting will hold the personal information provided by consultants on their professional CVs when registering to become a member of the independent consultants registry.

How we might use your information

If you are a Practical Action supporter who receives marketing materials or makes donations

We may use your information for administration purposes.

Processing your donation

When you make a donation or other payment to Practical Action, we will use your payment and contact details, payment amount, date and time of payment to process that payment and take any follow-up administrative action needed (for example, sending a receipt).

If you choose to include Gift Aid in a donation to us, we will also ask for your address and UK taxpayer status as this information is <u>required by law</u>. You can read more about how Gift Aid works <u>here</u>. This information is needed for us to fulfil our obligations under tax (<u>sections 413</u> to 430 Income Tax Act 2007) and charity law. Information associated with Gift Aid declarations must be retained for 7 years. This information will be shared with HMRC for tax regulation purposes and may also be shared with the Fundraising Regulator and the Charity Commission in the event of an enquiry or investigation.

Responding to enquiries

If you contact us with a question, comment, compliment or complaint then we will keep a record of this correspondence and any associated documents. This is so that we have the information available in the event of a follow-up, dispute or investigation.

Notifying you of changes to policies

If we make significant changes to our policies which may affect you, we will use your contact details to inform you of the changes.

Requesting information if you are attending our events

If you participate in an event that we have organised, we may ask you to provide information to make sure we can manage the event safely and efficiently. We may also ask you for details of any accessibility needs which you may have, so that we can ensure our event is inclusive, in line with the provisions of the Equality Act 2010.

If you participate in an event organised by an external party or make a donation through a processor like JustGiving, then your information may be passed to us by the processor. We may use this information for marketing purposes but you have the right to unsubscribe or opt out of future communications. Clear information on how to unsubscribe or opt out will be provided within such communications.

We may use your information to invite you to become involved with us in new ways, raise funds, or grow our supporter base.

Sharing marketing and fundraising materials with you

Marketing and fundraising materials that we might share with you include information about our activities and their impact, our news, events and fundraising appeals, as well as other ways you can become involved with us. We run a number of e-newsletters, including for people interested in certain specific projects, for our Development Education work and for Practical Answers, among others. For these we share information about our activities and events to people we think will be interested and individuals who have signed-up.

Where you have provided your postal address or telephone number we may send this information to you by post or by calling your telephone unless you have asked us not to. We may also email you this information or send by SMS if you have agreed for us to do so, or if you are a representative of an organisation and would be interested in our message.

You can let us know at any time if you'd prefer to change how we share this information with you or stop it altogether. Simply use the details we've provided in the 'Contacting us' section to let us know your preferences. If you receive our e-newsletters, you can also use the unsubscribe link in the emails we send.

We will keep your personal information for no longer than is necessary for the purposes for which it is processed (in accordance with our internal policies including our Data Retention Policy). If you ask us not to contact you, we will keep some basic information about you on our suppression list in order to avoid sending you unwanted materials in the future. If you have told us that you would like to leave Practical Action a gift in your Will, we may keep your donor record for longer than others, unless you tell us not to.

Targeting our communications and researching our supporters

We have a duty to make sure that we're spending your donations wisely and that means doing some research and analysis to inform our decisions. We want to send the most effective messages that we can in the most efficient way possible. In order to work out who to contact, what to say and when to get in touch, we carry out the following activities:

Analysing how emails are opened and read — we track emails which we have sent to you to see which messages have the highest response rates and whether there are messages that resonate with particular groups of people. We do this by logging whether emails we send have been opened, deleted and interacted with (for example, by clicking on links within the emails). Although we only use this information to look at general patterns, it is still personal information because it is linked to your email address. We may ask you occasionally whether you still want to receive emails, and unsubscribe you if we do not hear from you. We use email platforms such as Dotmailer and Mailchimp (which have their own privacy policies) to manage and send fundraising, newsletter and project update emails, and to ensure you are unsubscribed if you opt out of email messaging.

Segmentation – this is where we analyse information such as your postcode, region, the subjects you are interested in and what kind of interaction you have had with us and how recently. This helps us to tailor appropriate communications to you, as well as improve your experience as a Practical Action supporter.

Analysing our supporter base to send different communications to people who might choose to give higher donations – we undertake in house research and engage other organisations such as Experian and Factary to help us identify people who may be able to support us with a larger gift; using information you have given us and publicly available records such as the electoral roll, land records, 'rich lists', Who's Who publications and Companies House records. We may also collect information on your interests, for example board memberships, career, hobbies, or articles about you in newspapers or magazines. You can find more information about the Sources we might use here. We use this information to tailor our communication with you and invite potential supporters to get involved with us in new ways including joining groups and events or exploring publications which may be of interest to them.

Finding other people like you who might like to hear from us - we may use the email address you give us to help find more people like you, so that we can grow our supporter base through our online channels. We use third party services to do this which you are likely to be familiar with, including Google, Facebook and Twitter.

When might we have your information that you may not have given to us directly?

We may add information or update your record with us, from publicly available sources. This may include your telephone number, address, information from death registers, age or the information mentioned in the section above <u>'Targeting our communications and researching our supporters'</u>. We use this information to tailor our communications with you and send you more appropriate information.

These activities form a vital part of keeping support for our work going. You can request more information on these activities or change your preferences, by using the information in the <u>'Contacting us'</u> section at the beginning of this document.

We may use your information to enforce and comply with the law

We ensure that our activities comply with the law. Therefore we may need to share or use your personal information if we are required to do so by law (for example; in response to a warrant or court order) and we may use information from other sources for the purposes of fraud prevention, for example to comply with money laundering regulations, or to protect people's rights, property or safety.

If certain levels of donation are made, the Fundraising Regulator's Code of Fundraising Practice requires us, and all charities in the UK, to perform checks. More details can be found at www.fundraisingregulator.org.uk.

If you are a Practical Action Publishing author or customer who receives marketing materials, places an order or submits a proposal

Practical Action Publishing does not share its contact lists with the rest of the Practical Action Group and maintains separate systems for payment and order fulfilment.

Processing your purchase

When you make a payment to Practical Action Publishing, we will use your payment and contact details, payment amount, date and time of payment, to process that payment and take any follow-up administrative action needed (for example, sending a receipt).

As a Practical Action Publishing customer, in order to process your payment we may provide financial information to our distributor and to account processors including banks. We will not sell your information to another trader or business for the purposes of marketing or any other activity.

Notifying you of changes to policies

If we make significant changes to our policies which may affect you, we will use your contact details to inform you of the changes.

Requesting information if you are attending our events

If you participate in an event that we have organised, we may ask you to provide information to make sure we can manage the event safely and efficiently. We may also ask you for details of any accessibility need which you may have, so that we ensure our event is inclusive, in line with the provisions of the Equality Act 2010.

If you participate in an event organised by an external party, then your information may be passed to us by the processor. We may use this information for marketing purposes but you have the right to unsubscribe or opt out of future communications. Clear information on how to unsubscribe or opt out will be provided within such communications.

We may use your information to inform you about new products and services from Practical Action Publishing that may be of interest to you

Sharing marketing materials with you

Marketing materials, including e-newsletters that we might share with you include information about our activities and their impact, our news, events, call for publishing submissions, new products and services. We share information about our new publications and products with individuals who have signed-up, past and potential customers and stakeholders.

Where you have provided your postal address we may send this information to you by post unless you have asked us not to. We may also email you this information if you have agreed for us to do so or if you are a representative of an organisation and would be interested in our products and services.

You can let us know at any time, if you'd prefer to change how we share this information with you or stop it altogether. Simply use the details we've provided in the 'Contacting us' section to let us know your preferences. If you receive our e-newsletters, you can also use the unsubscribe link in the emails we send.

We will keep your personal information for no longer than is necessary for the purposes for which it is processed (in accordance with our internal policies/retention policy). If you ask us not to contact you, we will keep some basic information about you on our suppression list in order to avoid sending you unwanted materials in the future.

Targeting our communications and researching our publishing customers, authors and reviewers

We have a duty to make sure that we provide the best possible service, and that means doing some research and analysis to inform our decisions. We want to send the most effective materials that we can in the most efficient way possible. In order to work out who to contact, what to say and when to get in touch, we carry out the following activities:

Analysing how emails are opened and read – we track emails which we have sent to you to see which messages have the highest response rates and whether there are products that resonate with particular groups of people. We do this by logging whether emails we send have been opened, deleted and interacted with (for example, by clicking on links within the emails). Although we only use this information to look at general patterns, it is still personal information because it is linked to your email address. We use email platforms such as Dotmailer and Mailchimp (which have their own privacy policies) to manage and send fundraising, newsletter and project update emails, and to ensure you are unsubscribed if you opt out of email messaging.

Segmentation – this is where we analyse information such as type of customer i.e. returning customer, organisation, academic, author etc (we do not share identifying information with peer reviewers); geographic region; subject specialism; product type i.e. books, journals, print, or digital, and what kind of interaction you have had with us and how recently. This helps us to tailor appropriate communications to you, and improve your experience as a Practical Action Publishing customer, author or reviewer.

When might we have your information that you may not have given to us directly?

We may also add information or update your record with us, from publicly available sources such as faculty websites, LinkedIn or academic e-libraries. This may include your telephone number, address, or the information mentioned in the section above 'Targeting our communications and researching our publishing customers, authors and reviewers'. We may also collect information on your interests, for example academic affiliations, career, or your previous publications. We use this information to tailor our communications with you and send you more appropriate information.

Practical Action Publishing also act as a partner agent for other development organisations to create and publish research papers and books, including Oxfam, the Sphere Project, and Latin America Bureau, among others. This means Practical Action Publishing are contracted as a data processor to undertake publishing, distribution and marketing activities for them.

To do this, such partner organisations may share their contact lists which are processed on their behalf in compliance with Practical Action Privacy and Data Retention Policies. We do not use this data for any other purpose.

These activities play a vital part in allowing us to provide the best possible service. You can request more information on these activities, or change your preferences, by using the information in the <u>'Contacting us'</u> section at the beginning of this document.

We may use your information to enforce and comply with the law

We ensure that our activities comply with the law. Therefore we may need to share or use your personal information if we are required to do so by law (eg. in response to a warrant or court order) and we may use information from other sources for the purposes of fraud prevention, for example to comply with money laundering regulations, or to protect people's rights, property or safety.

If you are a Practical Action Publishing customer, author or reviewer and have visited our websites

We collect your information and use it to process your book or subscription order payment on www.developmentbookshop.com and to provide online access to your purchased content on www.developmentbookshelf.com; to process your journal or book submission on www.editorialmanager.com/foodchain/, www.editorialmanager.com/waterlines/, www.editorialmanager.com/books/; to update you with information about our products and services; and to provide you with the best possible service.

The IP address of the computer you are using is logged on www.developmentbookshelf.com as it is integral to the secure IP authentication necessary for users to access online publishing products and content.

When you access our websites, some cookies are saved to your computer, for example if you have chosen a particular language setting or created a user account. You can also turn off your cookies so that we can't access that information.

Read more about the above Practical Action Publishing websites and cookies policies here.

https://developmentbookshop.com/privacy-notice

https://www.developmentbookshelf.com/privacynotice

https://www.practicalactionpublishing.org/privacy-and-cookies

If you are applying for a role within Practical Action or subsidiary company

Your CV, covering letter and application form for any position with the Practical Action Group will be used during the recruitment process to short list suitable candidates who will be invited to proceed to the interview stage, and to select the final candidate that the role will be offered to.

We sometimes use third party job application platforms to publish and receive applications for roles at the Practical Action Group. When you apply through these portals the organisation's privacy information will be available to you. We only work alongside other organisations in this way under a contract and if we are satisfied that they will keep your information safely and use it only in the same legal ways that we would.

During the recruitment process, we may perform some checks on your identity, your right to work in the UK where applicable, your eligibility to work with vulnerable people and your past employment references.

If your application is successful, this information will then form part of your personnel file.

We delete the personal information of unsuccessful applications one year after the application process ends in case there are follow-up queries about the process, unless a candidate requests that we keep their details for longer. Statistical information like ethnicity, sexuality and disability may be kept to ensure that our recruitment processes are inclusive and not discriminatory, but this is completely anonymised.

If we are required by law to share your information, (e.g. in response to a warrant or court order), we will do so.

Consultant details are held on our consultancy database and shared within Practical Action Consulting, including outside of the UK, for potential roles. We will contact you if we find a suitable role or proposal which we think you may be interested in. To ensure your information is accurate and that you are happy to remain on our database, we will ask you to refresh your CV with us periodically according to our Data Retention Policy.

If you are a Volunteer for Practical Action

We have a small pool of amazing volunteers, including in our community engagement work, our Board of Trustees and Speaker Network, among others who do fantastic work to support Practical Action's mission. We collect and process your contact details, keep track of the support you provide to the charity and may need to collect or process other information about you to ensure we comply with laws such as health and safety, data protection and anti-fraud. We will make it clear what this information is for and how we are using it. We will send you information about similar ways you can get involved, and may ask for your permission to send you information about other Practical Action events, fundraising information and updates by email.

We hold your information on our secure network and only allow access to our employees who need your information to do their jobs. If we are required by law to share your information, (for example; in response to a warrant or court order), we will do so.

If you have visited our websites

We log the IP address of the connection to the computer or device you are using in order to protect our servers against abuse and malicious activity. The logs are deleted every 30 days. Other information is used to measure the performance of the websites, the volume of traffic that the sites receive, how site users move around the sites and what sort of users the sites attract. You can find out more in our website and cookies policy. Please see *If you are a Practical Action Publishing customer, author or reviewer and have visited our websites* section for information about cookies on the Practical Action Publishing websites.

When you access our websites, some cookies are saved to your computer, for example if you have chosen a particular language setting. You can also turn off your cookies so that we can't access that information. Read more here about the cookies our sites use

If you receive our services or take part in our projects across the world

As part of our work in developing countries, we collect and process the personal information of some of our beneficiaries and partners. This helps us to ensure we are delivering the solutions that are so needed. We need to collect evidence of, and track, the change we are contributing to. We also collect case studies and photographs. We will always explain what your information and photos will be used for and ask for your agreement. We keep photographs and case studies on a database which is shared with other Practical Action offices.

In many cases, we carry out data collection, processing, service delivery, evaluations and collect case study information in partnership with, or on behalf of, a partner organisation. We have data sharing agreements in place to ensure we protect your information and respect your data protection rights and freedoms.

If you are the executor or co-Beneficiary of a Will that includes a gift to Practical Action

We will process only the information we need to for the purpose of administering the gift. We keep the contact details and correspondence of solicitors and Lay Executors on our secure systems, and ensure we securely destroy information in line with our Data Retention Policy. Any information relating to co-beneficiaries may be included within the contents of a Will, which becomes a public record after probate.

Who the Practical Action Group shares personal information with and why

We promise to make all reasonable efforts to keep your details secure and will only share them with suppliers or professional agents working on our behalf, for example professional fundraising and distributor organisations who send out our materials, or telephone agencies making fundraising calls on our behalf. We carefully select these partners and will only share information with them if we are confident that they will protect it, and we have a contract in place with them that assures this.

We share certain information between the different entities within the Practical Action Group. Practical Action Publishing and Practical Action Consulting use the Charity's central HR, Finance, IT and other business services and therefore share the personal information needed to, for example, recruit and employ people, make payments and process donations. We share contact lists between Practical Action Consulting and the Charity for activities including project administration and communicating events and news about our work to those we think would be interested. Practical Action Publishing does not share its contact lists with the rest of the Group and maintains separate systems for payment and order fulfilment. We have data sharing agreements in place to ensure these activities maintain your data protection rights and freedoms.

We will never share your details with other organisations to use for their own purposes, other than where we are required to by law. The Practical Action Group will not, under any circumstances, share with or sell your personal information to 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.

Certain third party organisations collect information on our behalf as well as for their own use. We may receive your personal details from other organisations for our marketing purposes where you have consented for this information to be shared, for example JustGiving, and Virgin Money Giving. We use LinkedIn to advertise and source candidates for our Consulting and project opportunities. These organisations have their own data protection and privacy policies and we urge you to make yourself aware of these before signing up.

We may also use other companies to provide services and process your personal information on our behalf, including delivering postal mail, making telephone calls to our supporters, sending emails, sending SMS messages, processing credit or debit card payments and analysing our supporter information as outlined above, to help us offer you communications that are most appropriate to you and your interests. In some cases, our suppliers may use software which analyses publicly available information (as outlined above) to build up a picture about you based on the factors set out in the 'Targeting our communications and researching our supporters' section.

Transfer of personal information outside of the EEA

The Practical Action Group is aware that countries outside the European Economic Area have differing approaches to data privacy laws, and that enforcement may not be as robust as it is within Europe's borders. We will only transfer information outside the EEA if security measures are in place and only under a formal contract.

If you have applied for a role at the Practical Action Group which has an international element that requires you to work overseas or work closely with teams based outside the UK, then your personal information will be transferred to those countries in order for you to be able to carry out your role and the organisation to provide the support that enables you to do this. We take care to keep this information within the Practical Action Group network, whose servers are maintained in the UK, and limit the team members who have access to those who need it in order to do their job.

The transfer of your information is governed by EU model contract clauses which set out how the organisation outside the EEA is required to protect your privacy rights by adhering to European data protection standards.

Organisations we work with who process personal information in the USA have verified their data processing standards meet the EU-US Privacy Shield, which sets out clear safeguards and transparency responsibilities for US based organisations processing personal information from EU citizens.

Information security

The Practical Action Group takes the care of your information seriously and protects your personal information in a range of ways including secure servers, firewalls and SSL encryption. We follow payment card industry (PCI) security compliance requirements when processing credit card payments. We operate a policy of restricted, password controlled, access to any of your information which is stored on our systems.

Children's information

While we do not actively collect information from children (under 18s) in the UK, we appreciate that our supporters are of all ages. Where appropriate, we will always ask for consent from a parent or guardian to collect information about children. All Practical Action Group events will have clear rules on whether or not children can take part, and the collection of information will be managed in accordance with each individual event, with appropriate safeguards in place.

We deliver some services, undertake some research and collect case studies and photographs of children with the permission of their parent or guardian. Our employees, consultants and volunteers agree to and abide by a Safeguarding Policy, and are held to high standards of ethical behaviour to respect the rights of children and protect their privacy and safety.

Your rights

How to request copies all of the information we hold about you, otherwise known as a Subject Access Request

You have the right to ask for a copy of all of the information related to you that we are processing. You can request this using the 'Contacting us' section above.

How to ask us to amend or delete your information

If you information is incorrect, out of date or if there is no longer justification for us to hold it, you can ask for it to be updated, removed or blocked from our use.

How to request your information so that you can use it elsewhere

You can ask for a copy of any personal information that you have provided to us in the past. We will provide it in a clear and easy to follow format. Please note that if you ask for the material to be sent electronically but prefer not to use our secure file transfer service, The Practical Action Group cannot be held responsible for the security risk to your information as it travels across the Internet.

Our legal basis for contacting you and using your personal information

When you sign up to a newsletter or opt in to receive communications from us e.g. on a donation form or by completing a form online, or if you give us your permission in person, e.g. at an event or over the telephone, then you are giving us your consent to send you marketing and fundraising materials by the methods you have chosen (e.g. email or phone call). We will only send emails or SMS messages to you if you have consented for us to do so, or in some cases if we need to for an administrative reason. There are two exceptions to this: we may send you information by email or SMS if we are contacting you in your professional or business capacity, or if you are a past customer of Practical Action Publishing. You can withdraw your consent at any time or ask us not to contact you by these methods.

If you have provided us with your postal or telephone contact details, but haven't specifically opted in to receive our communications (for example, making a donation by post, registering an account or placing an order), then we will carry out an assessment of whether it would be fair and reasonable to use them to send marketing and fundraising information to you without your explicit consent (i.e. it is in the interests of our aims as a charity or Practical Action Publishing's aim to provide the best possible products and services and will not cause undue prejudice to you). This is called a "legitimate interests assessment". You can opt out of our marketing and fundraising communications at any time if you don't want to receive them.

We will ensure we have a legal basis to use your personal information for the other purposes mentioned in this policy (usually with your consent, further to a legitimate interests assessment, or because the use of your data is necessary to comply with a legal obligation).

You can find out more about your data protection rights and the rules for privacy in electronic communications on the <u>Information Commissioner's Office (ICO) website here</u>.

You can find out more about data protection law here: General Data Protection Regulation 2018 from 25th May 2018

This policy was last updated in June 2018.

The Practical Action Group reserves the right to make alterations from time to time. Please check this website from time to time for the latest version.