

Practical Action

GROUP PUBLIC PRIVACY Published on WEBSITE POLICY

| Version | 0003.00 |
|-------------|---|
| Date | December 2024 |
| Scope | All Employees, Trustees, Consultants and others acting on behalf of Practical Action or its subsidiaries |
| Review date | July 2025 |

| Approval required from | Board of Trustees |
|-----------------------------|--|
| Policy Owner | Head of Supporter Experience and Digital |
| Responsible Director | Fundraising. Marketing & Communications Director |
| Approval date | December 2024 |
| Queries: | Contact the Policy Owner |
| Exceptions: | Contact the Responsible Director |

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

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Dec 24 – V0003.00 Big change starts small

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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 and Practical Action Consulting subsidiary offices in locations across the world as well as associations with two locally-registered overseas entities carrying the Practical Action name.

Our vision

We put ingenious ideas to work so people in poverty can change their world.

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

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Post: Supporter Services, Practical Action, The Robbins Building, 25 Albert Street, Rugby, Warwickshire, CV21 2SD

Phone: 0800 389 1624

If you would like to make a request to access the information we hold about you or make a complaint about how your personal information has been used; please write to us at:

Post: Data Protection, Practical Action, The Robbins Building, 25 Albert Street, Rugby, Warwickshire, CV21 2SD Email: <u>myprivacy@practicalaction.org.uk</u>

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>.

If you want to make a request to access the information, we hold about you or complaint about your personal data and **you reside in the EU (European Union)**, please contact our **EU Nominated representative** at: Post: Castlebridge. Unit 7, 12 Mountjoy Square Dublin 1. Ireland. Email: peter.davey@castlebridge.ie

What information we collect about you

Personal information is collected directly from you when you interact with the Practical Action Group, for example donating, purchasing a gift, sending or receiving an email or digital advert, responding to a survey, making an enquiry, visiting our website or social media channels, 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 /procure information about you from other sources (including public sources). This is explained in the '<u>How we might use your information</u> section below.

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

The information we hold will typically include some, or all of, your name, postal and email addresses, your phone number, and a range of digital information as referenced in our cookies policy. 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 consultant's 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 or to improve our services.

Processing your donation

When you donate 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 to 430 Income Tax Act 2007</u>) and charity law. 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, investigation or to tailor appropriate communications to you.

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 engage with or donate to Practical Action via 3rd party organisations, they may pass your personal information to us in line with their data protection policy. Some examples of this include joining a Zoom hosted event, donating via JustGiving or other donating platforms and attending Blue Dot festival. We may use this information to contact you regarding your donation. 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, fundraising appeals and other specific projects. We might also use surveys to help us improve our communications and services, as well as other ways you can become involved with us.

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. If you have opted into marketing emails, we may use the email address provided to match your account on Facebook or other digital channels in order to show you Practical Action content while using these services. We always ensure your data is kept secure by encrypting it. No data we hold about you is retained by the third party.

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 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 or responding to surveys). We use this information to look at general patterns and tailor appropriate communications to you. 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 <u>DotDigital</u> and <u>Mailchimp</u> (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.

Market research – we may contact you with a survey/questionnaire, in order to find out what you think/feel about aspects of our work, fundraising or events, or topics related to other charities or international development more broadly. Each survey will make clear whether responses will remain anonymous, or identify you as an individual. We may use this information to improve the way we communicate with you, and others, or to respond to any concerns raised in the answers.

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 how new supporters respond to our marketing activities

When a new supporter chooses to donate to us, we will work with our 3rd party media agencies to analyse how and who responded to a particular activity. This analysis may include your data being reviewed by Practical Action or by the 3rd party. We may also analyse the information we have where people haven't responded to our marketing activities too. We do this to make sure we are investing in the most efficient fundraising activities.

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 <u>Experian</u> and <u>Factary</u> 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 <u>sources we might use here</u>.

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 data 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.

If we hold your email address we may use it as a deduplication tool, to prevent existing supporters being targeted with marketing designed to attract new supporters via digital channels such as Facebook or Google. We may also use the email addresses to build a profile of our digital channel audiences. This will help us identify other users of these platforms whom we believe would be interested in Practical Action, and we may then show them Practical Action content.

If you do not wish for us to use your email address in this way please use the details we have provided in the '<u>Contacting us</u>' section to let us know your preferences. Alternatively, if you wish to stop any of the social media platforms using your email address in this way you can do this individually via the following routes:

- <u>Facebook</u>
- <u>Instagram</u>
- <u>LinkedIn</u>
- <u>Twitter</u>
- <u>Google</u>
- <u>YouTube</u>

Updating your preferences with Practical Action will not guarantee that you never see Practical Action content on social media, since the social media platform may select you based on other criteria and without your data having been provided by Practical Action.

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 mentioned above 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 <u>www.fundraisingregulator.org.uk</u>.

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

Practical Action Publishing may 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 '<u>Contacting us</u>' 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 <u>DotDigital</u> and <u>Mailchimp</u> (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 (e.g., 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 and to provide online access to your purchased content on <u>https://practicalactionpublishing.com/</u>, 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 <u>https://practicalactionpublishing.com/</u> 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.

- <u>https://practicalactionpublishing.com/privacy</u>
- <u>https://practicalactionpublishing.com/cookies</u>

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 ensuring 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 Speakers 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 7 days. Other information is used to measure the performance of the websites, the volume of traffic, how 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 cannot access that information. <u>Read more here about the cookies our sites use.</u>

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 if possible.

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 People and Culture (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 may 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.

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 <u>'Targeting our communications and researching our supporters</u>' section.

Transfer of personal information outside of the UK and EEA

The Practical Action Group is aware that countries outside the UK and 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 UK and 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) 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 of all 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 <u>'Contacting us'</u> section above.

How to ask us to amend or delete your information

If your 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. You can request this using the <u>'Contacting us'</u> section above.

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 lawful 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 interest assessment." You can opt out of our marketing and fundraising communications at any time if you do not want to receive them.

We will ensure we have a lawful basis to use your personal information for the other purposes mentioned in this privacy notice (usually with your consent, further to a legitimate interest's 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 privacy notice was last formally updated in October 2022. The Practical Action Group reserves the right to make updates from time to time. Please check this website from time to time for the latest version.

Linked Practical Action Policies and Endorsements

- pA Website and Conditions Website and cookies Practical Action
- Principles for Digital Development <u>Principles-for-Digital-Development-Endorsement-Letter-v2-</u> letterhead.pdf
- Open Information Policy <u>Notice of AGM</u>
- Data Protection Policy
- Data Retention and Destruction Policy

Dec 24 – V0003.00 Big change starts small