

### **POLICY TITLE**

**Data Protection Policy** 

### AIMS OF POLICY

Amnesty International UK (AIUK) is used as a collective name for:

- Amnesty International UK Section Charitable Trust, (registered charity 1051681, company number 3139939)
- Amnesty International United Kingdom Section, (company number 1735872)
- Amnesty Freestyle Limited (company number 02918065)

AIUK's companies are registered with the Information Commissioner's Office (ICO) as data controllers and have a legal duty under the Data Protection Act 1998 (the Act) to protect the personal information that it collects and processes.

The purpose of this policy is to inform the general public, AIUK employees and volunteers about the personal information that AIUK collects and uses, how this data may be used, and the procedures that AIUK has implemented to comply with the Act and protect people's personal information.

### WHO THIS POLICY APPLIES TO

This policy applies to the general public, AIUK Section and Charitable Trust employees, and our office and shop volunteers. AIUK employees and our office and shop volunteers are required to adhere to this policy. It protects the personal data of our data subjects which include our members, supporters, volunteers, employees and the people that we help.

### **POLICY STATEMENT**

AIUK has implemented processes and procedures to ensure that we comply with the Act. All employees and our office and shop volunteers are responsible for following this policy and the agreed processes and procedures.

The eight principles of the Act require that:

- 1. Personal data shall be processed fairly and lawfully
- 2. Personal data shall only be processed for the purposes for which it was obtained
- 3. Personal data shall be adequate, relevant, and not excessive in relation to its purpose
- 4. Personal data shall be accurate and kept up to date
- 5. Personal data shall not be kept for longer than is necessary



- 6. Personal data shall be processed in accordance with the rights of Data Subjects
- 7. Appropriate technical and organisational measures shall be taken against unlawful processing or accidental loss
- 8. Personal data shall not be transferred outside the European Economic Area (EEA) unless the country has equivalent Data Protection standards

AIUK has implemented appropriate physical, technical and organisational measures and controls to ensure that the personal information that we process is secure, accurate and up to date. We only keep personal information for as long as is reasonable and necessary.

We provide data protection guidance and training for our employees and office / shop volunteers so that they are aware of their data protection responsibilities. This is provided when they join us and subsequently once a year as refresher training.

We report to both our Boards (of AIUK Section and of AIUK Charitable Trust) on the effectiveness of our efforts and on any area in relation to Data Protection through routine regular face to face meetings and other appropriate channels when required.

We collect information about our members, supporters, the people that we help, volunteers and employees. This may include name, contact details, date of birth, gender, interests, items that are ordered or purchased from us, bank account and credit card details.

We may use the personal information that we collect to:

- Provide our members, supporters, and the people that we help with the services, products or information that they ask for
- Provide our members, supporters, and the people that we help with information about us and the work that we do, including fundraising and campaigns
- Administer membership payments, donations and other financial transactions, including processing gift aid
- Keep a record of our relationships with members, supporters and the people that we help
- Manage supporters and members' marketing and communication preferences
- Target online advertising effectively, reaching people who share similar interests and characteristics to our supporters
- Undertake equal opportunities monitoring
- Undertake ethical screening to inform decision-making regarding the solicitation, acceptance and refusal of donations and any other partnerships that AI / AIUK might enter

We may share your information with social media providers to help us ensure our posts reach individuals that are likely to be interested in them — saving us money and helping us to achieve the greatest impact.

We may analyse or hire the services of third parties to analyse supporters' personal information. This may involve carrying out research on the number and characteristics of supporters that live in particular areas, their interests and behaviours. This helps us to gain a better understanding and create profiles of interests and preferences, so that we can improve our marketing, communications and service, contacting supporters with information that is relevant to them.



We will never sell the personal data of our members, supporters, the people that we help, volunteers or employees.

We will never share personal data with organisations outside of Amnesty International UK for their own use unless we have prior consent to do so or are required to do so by law. Where we need to use third party organisations to process personal data on our behalf, for example a mailing house, we will put in place a contract with the company to ensure that the data is properly protected and treated in accordance with the Act.

If we transfer personal information to countries or jurisdictions which may not provide the same level of data protection as the UK, we will comply with our legal obligations as a data controller under the Act. We will put in place a contract with the company that we transfer the information to in order to ensure that the data is properly protected.

We respect the privacy of our members, supporters, and volunteers and their right to decide how and if Amnesty International UK contacts them. They are able to choose how they want to hear from us, and if they ask us not to contact them we won't, unless it is a legal or administrative requirement to do so.

Anyone may inform us of changes to their personal information, withdraw their consent for how we use their data, or request more detail about the personal information that we hold and how we use it by calling the Supporter Communications Team on 020 7033 1777 or emailing sct@amnesty.org.uk

Anyone can make a request for a copy of the information about them that we process. Please see our Amnesty International UK Subject Access Request Form.

### **DEFINTIONS**

'Personal information' includes personal and sensitive personal data. It is information which identifies a living individual.

A 'Data Subject' is someone whose personal information we hold and process, for example, a supporter or member.

'Processing' includes the concepts of obtaining, holding, recording, retrieval, consultation and disclosure.

'The Principles' are the rules that must be followed when processing personal information and in order to comply with the Act

A 'Data Controller' is an organisation which determines the purposes for which and the manner in which personal data is processed

A 'Data Processor' is a third-party organisation such as mailing house which AIUK uses to process personal data in its behalf



### RELATED POLICIES, PROCEDURES, PROCESSES, FORMS GUIDELINES AND OTHER RESOURCES

This policy is supported by the following policies and procedures, in order to enable our employees and office and shop volunteers to implement this policy.

- Amnesty International UK Fundraising Policy
- Amnesty International UK Privacy Policy
- Amnesty International UK Cookie Policy
- Amnesty International UK, Data Protection Procedure Complying with the Eight Principles
- Amnesty International UK, Data Protection Procedure Staff and Volunteer Responsibilities
- Amnesty International UK, Data Protection Procedure Training for Staff and Volunteers
- Amnesty International UK, Data Protection Procedure Staff and Volunteer Responsibility Agreement
- Amnesty International UK, Data Protection Procedure Subject Access Request Procedure and Form
- Amnesty International UK, Data Protection Procedure Managing a Data Protection Breach
- Amnesty International UK, Data Protection Procedure Data Retention Schedule
- Amnesty International UK, Data Protection Procedure Collecting Personal Information
- Amnesty International UK, Data Protection Procedure Collecting and Using Personal Information from the Public Domain
- Amnesty International UK, Data Protection Procedure Taking and Using Photographs, Videos, Webcams, and other Recordings
- Amnesty International UK, Data Protection Procedure Marketing to Supporters
- Amnesty International UK, Data Protection Procedure Telephone Marketing
- Amnesty International UK, Data Protection Procedure- Working with Children's Personal Information
- Amnesty International UK, Data Protection Procedure Data Protection Act Compliance Guidance for Groups
- Amnesty International UK, Data Protection Procedure AIUK and Groups Sharing Personal Information



### **HOW IS THIS POLICY SHARED?**

This policy is a public document and as such is available on Amnesty International UK's website to the public and to supporters of Amnesty International UK. Amnesty International UK will share this policy with all staff, our office and shop volunteers and groups.

### **COPYRIGHT AND LEGAL INFORMATION**

This policy is for information only, and therefore is not a binding contract and does not confer legal rights on any person. Amnesty International UK reserves all rights (including copyright) in any information and materials provided under this policy.

#### **FEEDBACK**

Listening and responding to feedback from our supporters and members is very important to Amnesty International UK. We will acknowledge a complaint about any aspect of our data protection policy within 5 working days and aim to resolve complaints within 10 working days of receipt. If you are dissatisfied with our response, please contact the Feedback Oversight Panel on the details below.

Write: Amnesty International UK

The Human Rights Action Centre Supporter Communications Team

17-25 New Inn Yard

London EC2A 3EA

Phone: +44 (0) 20 7033 1777 (Monday to Friday – from 9am to 6pm)

Fax: +44 (0) 20 7033 1503 Text phone: +44 (0) 20 7033 1664

Email: feedback@amnesty.org.uk

Website: www.amnesty.org.uk/feedback

For more information about giving feedback to Amnesty International UK, please refer to our <u>Feedback Policy</u>, available on our website.



### **ASSURANCE PROCEDURE**

Amnesty International UK has clear governance and management controls in place. Our Director of Corporate Services reports regularly to the Trustee Board of Amnesty International UK Charitable Trust and the Directors of Amnesty International UK Section.

### WHO IS RESPONSIBLE FOR THIS POLICY?

Amnesty International UK's Director is ultimately responsible for compliance with this policy, with the support of Amnesty International UK's Senior Management Team.

Author/policy contact:	Ben Smith, Head of Data & Insight
Sign off:	Amnesty International UK Senior Management Team
Approved by/approval level:	Amnesty International UK Charitable Trust Board of Trustees and Amnesty International Section Board of Directors
Date effective:	July 2017
Last reviewed or updated:	July 2017
Frequency of review:	Annually
Supersedes:	Data Protection Policy, July 2015