



OSCAR India

Privacy Policy

Charity Number: 1149486

Version Control:

Version number	Author	Date	Summary of changes
0.1	Alice Lewthwaite	3 rd June 2018	First draft
1.0	Alice Lewthwaite	16 th June 2019	Updated with new contacts

Privacy Policy

At OSCAR India we rely on the generosity and support of individuals like you to carry out our vital work with young people. That is why we want to be transparent about why we need the personal details we request when you engage with us and how we will use them.

OSCAR India is committed to protecting the personal data that we collect and process about you. We aim to be clear and transparent and not do anything you wouldn't reasonably expect. We do this by ensuring you are provided with an explanation about how OSCAR India collects and processes the information you provide us with, or that we collect about you, whether online, via phone, email, in letters or in any other correspondence or from third parties.

We collect and use personal data to ensure that we can manage our relationships with our supporters or provide programmes to young people, and to better understand how we can meet and exceed our supporters' expectations.

Please read this policy carefully, along with our Terms and Conditions and any other documents referred to in this policy, to understand how we collect, use and store your personal information.

The privacy policy covers the following:

1. Who we are
2. Where OSCAR India collects its information from
3. What information OSCAR India may collect about you
4. How OSCAR India will use the information we collect
5. How OSCAR India will update your information
6. Where OSCAR India will disclose your details to anyone else
7. How to access, correct or delete your information
8. How OSCAR India uses cookies
9. How we keep your data safe
10. How long we store your data for
11. Changes to the Privacy Policy
12. Contact us
13. Further information

By providing us with personal information, you consent to the collection and use of this information in accordance with this privacy policy. In accordance with the General Data Protection Regulation 2016/679, we will not keep your personal data for longer than is necessary.

We may update this policy from time to time without notice to you, so please check it regularly.

If you have any questions about this privacy policy and our cookies policy please contact our **Data Protection Officer** on dataprotection@oscar-india.org

1. Who we are

OSCAR India is a UK registered charity that works to deliver life skills to children and young people from low-income communities using football as a tool for development and to encourage them towards completing their education. We partner with OSCAR Foundation an NGO registered in India to deliver the majority of the programmes.

OSCAR India is comprised of both a charity which is registered as a ltd. company. In this policy wherever you see the words 'we', 'us' or 'our', it refers to both our charity and our ltd. company.

Our charity is OSCAR India, is incorporated with registered company number 07914440, Charity Number 1149486 in the UK. The principal office of both is 43 Loder Road, Brighton, BN1 6PL. Because of our not-for-OSCAR India – Privacy Policy v1.016062019

profit status we are not currently required to register with the Information Commissioner's Officer under the General Data Protection Regulation 2016/679, however we are required to embrace the processes and principles of the regulations:

2. Where do we collect information from?

We collect information in the following ways:

Information you give us

- OSCAR India may obtain personal information from you when, for example, you complete an online form to participate on a programme, register with us for a mailing list, apply to become a volunteer, take part in an event or make a donation.

Information from Third Parties

- We may also receive information about you from independent third parties, such as fundraising sites like Virgin Money Giving or event organisers such as a Football Club. We will only receive information from third parties in this way if you have given your consent for your information to be passed on to us. You should check their privacy policy when you provide your information to understand how they will process your information. Once we have obtained this information from the third party it will be covered by our privacy policy as well as by the originating third party.

Information we get from your use of our website and services

- We collect information about the services you use and how you use them, like when you watch a video on YouTube, visit our websites or view and interact with our ads and content.

Information in the public domain

- We may obtain some information from publicly available sources such as Companies House, newspaper articles or open postings on social media such as Facebook and LinkedIn.

3. What information do we collect?

The types of personal information that OSCAR India collects will depend on whether you are simply interested in what we do, are making a donation, volunteering or joining one of our programmes. We only collect what we need to deliver the service to you, but that could include:

- Your title, name, gender and date of birth;
- Your contact details (address, email, phone number and social media contact details);
- Family and spouse/partner details, relationships to other supporters;
- Medical information for programme participants;
- Travel documentation for programme participants travelling;
- Parental consent for children under 18;
- Your professional activities and employment details;
- Current interests and activities;
- Gift aid status and records of donations;
- Contact preferences;
- Information about your wealth;
- Media articles about you;
- Your IP address, location, browser type and information on how you interact on our website;
- Your bank or credit card details in line with payment card industry standards; and,
- Any other information provided by yourself at the request of OSCAR India.

Where appropriate we may also ask your interests and motivation for supporting OSCAR India, we will never make this question mandatory, and only want to know the answer if you are comfortable providing us with that information.

In some limited circumstances, the personal information that OSCAR India collects may include information that is considered “sensitive data”. This may include personal information regarding racial or ethnic origins, political opinions, religious beliefs, health and also information concerning criminal offences. Where this information is collected we will tell you so you know why it is needed.

If you are under 13 you should ask permission of a parent or guardian before sending personal or sensitive information to anyone online.

4. What might we do with your information?

If you have applied for one of OSCAR India programmes, OSCAR India will use your information to run, fund, develop and evaluate OSCAR India’s programmes.

If you support us, for example make a donation, volunteer, register to fundraise, sign up for an event we will mainly use your information to:

- Provide you with the services, products or information that you asked for, as well as information about other services, products or information we think might interest you where you have consented to being contacted;
- Administer your donation or support your fundraising, including processing Gift Aid;
- Send you surveys, and for market research;
- Invite you to events;
- Keep a record of your relationship with us and record the contact we have with you; and,
- Ensure we know how you prefer to be contacted.

Tools may be used to improve the effectiveness of OSCAR India’s communications with you, including tracking whether you open the emails we send you and which links you click within a message.

We may also use personal information to carry out due diligence so that we are fundraising in accordance within the law, the **code of fundraising practice** and our internal policies and procedures.

Profiling and analysing information of our supporters

- In order to tailor what type and level of support we ask you for, we may analyse personal information we collect about you including how you have engaged with us previously, demographic information, measures of affluence, philanthropic interests and networks.
- We may also use information in the public domain, for example listed Directorships or typical earnings in a given area.
- In some instances, we may use third party wealth screening companies or insight companies to provide us with general information about you (please refer to section 6 for further information on data shared with third parties).

You can opt out of your data being used for profiling and wealth screening techniques by contacting the **Data Protection Officer**.

5. How we update your information

We continuously review records of supporters and volunteers to ensure your data is as accurate as possible and always appreciate it if you let us know if your contact details change. Where possible we use publicly available sources to keep your records up to date for example or information provided to us by other organisations as

described in Section 1. It is important that we keep your personal data as up to date as possible so that we can cross reference your information with the Mail and Telephone Preference Services.

6. Who might we share your information with?

We are committed to protecting your data and therefore it will never be disclosed or sold to external organisations other than those acting as agents and data processors carrying out work on our behalf. Where we enter into a relationship with an external party, any such arrangements will be subject to a formal agreement between OSCAR India and that organisation to protect the security of your data. They only act under our instructions and we maintain full responsibility for your data.

Third Parties may include:

- Suppliers who send out communications on our behalf, such as invitations to our events;
- Wealth screening and insight companies (see section 3 for more information);
- Our Trustees where we share information for internal procedures and policies only;
- Our delivery partners within the UK or abroad to enable us to deliver our programmes effectively.

7. How to access, correct or delete your information

Under the General Data Protection Regulation 2016/679 you have the right to request a copy of the information that we hold about you. If you would like a copy of some or all of your personal information, please email the **Data Protection Officer** dataprotection@oscar-india.org or write to us at Data Protection Officer, OSCAR India, 43 Loder Road, Brighton, BN1 6PL.

We want to make sure that your personal information is accurate and up to date. You may ask us to correct or remove information that you think is inaccurate. If you do not want to receive any further information about OSCAR India and would like us to remove your name from our mailing list, please contact us to let us know. Please address all your requests, by email or mail, to our Data Protection Officer. To help us locate any personal information about you (or in case we need to get in touch with you to obtain further information to help us locate your records) please include your full name, address and telephone number with your request.

8. How OSCAR India uses Cookies

Like many websites, we may collect and record information in order for us to understand more about how our website is used and to provide you with a personalised experience when you visit our website. We use 'cookie technology' to do this. We may use cookies to gather certain information about you, including details of your operating system, browser version, domain name and IP address, and the details of the website you linked from to the website. OSCAR India uses Google Analytics to record this information and implements Demographics and Interest reporting, which enables us to better understand website usage and improve the experience for our visitors.

Cookies identify your browser, and basic information that you have shared with Google to our servers when you visit our website. They do not identify you as an individual. If you do not want to accept cookies you can easily disable this function by changing the settings on your Internet browser. You are able to completely opt out of Google Analytics for Display Advertising and customise Google Display Network adverts through your browser's Advert Settings.

9. How we keep your data safe

We aim to ensure that there are appropriate, physical, technical and managerial controls in place to protect any personal information you may provide to us. All of our staff receive training on handling data securely. Where we use external companies to collect or process data on our behalf we carry out comprehensive checks on them before we work with them and ensure that contracts are in place that set out our expectations and requirements. We may need to transfer your personal data outside of the European Economic Area (EEA) to

allow them to perform services on our behalf (for example invitation or participation in an event outside of the EEA in support of OSCAR India). In doing so your data may be stored or processed outside of the EEA. Where this happens we will endeavour to ensure that your data being processed in accordance with the appropriate security requirements in line with our legal responsibilities, and by submitting your details in such circumstances you agree to this transfer.

Despite all of our precautions no data transmission over the internet can be guaranteed to be 100% secure. So, whilst we will always strive to protect your personal information, we cannot guarantee the security of any information which you disclose to us and so wish to draw your attention that you do so at your own risk.

10. How long we store your data for

We will hold your personal information on our systems for as long as is necessary for the relevant activity. 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, we won't keep any information that we don't need.

11. Changes to this Policy

Any changes to this Policy will be notified by displaying the word 'NEW' next to the 'Privacy Policy' link on our Site at least 30 days before putting such changes into effect. This privacy policy was last updated on 16th June 2019.

12. Contact us

If you have any queries about this policy or any complaints with regard to the administration of the policy please contact our **Data Protection Officer**.

13. Further information

The laws governing how your personal data can be used are:

- General Data Protection Regulation 2016/679
- The Privacy and Electronic Communications Regulations 2003

We also follow the best practice code set out by the Fundraising Regulator: Code of Fundraising Practice. You can also contact the Information Commissioner's Office at ico.org.uk to find out more or report a concern. They are the UK's independent authority set up to uphold information rights in the public interest, promoting openness by public bodies and data privacy for individuals.