

## **AfID Privacy Policy**

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### **I. Introduction**

- This Privacy Policy explains what we do with your personal data, whether we are in the process of helping you find a volunteering placement or a job, continuing our relationship with you once we have found you a role, providing you with a service or updated information, receiving a service from you, using your data to ask for your assistance in relation to one of our Candidates, or you are visiting our website.
- It describes how we collect, use and process your personal data, and how, in doing so, we comply with our legal obligations to you. Your privacy is important to us, and we are committed to protecting and safeguarding your data privacy rights.
- You may visit this site without revealing any personal information. However, if you request specific information, provide feedback, participate in a marketing initiative or apply online for a job or a volunteering assignment, express interest in a role or to participate in our Workshop, you will be disclosing personal data to us. This will be treated in accordance with the principles set out in the Data Protection Act 1998 and the General Data Protection Regulation (Regulation (EU) 2016/679) (the "GDPR"). We will take all reasonable steps to ensure your personal data is protected against unauthorised access. We confirm that your data will not be disclosed or sold to another company or organisation. The only time we may disclose your personal data is when we are legally bound to do so or as required by our regulators.
- This Privacy Policy applies to the personal data of our Website Users, Candidates, Clients (see definitions below), Candidate and Client Referees, and Candidate Emergency Contacts. It also applies to AfID staff and their Emergency Contacts.
- For the purpose of applicable data protection legislation (including but not limited to the General Data Protection Regulation (Regulation (EU) 2016/679) (the "GDPR"), the company responsible for

your personal data ("AfID" or "us") can be found or contacted by email at [privacy@afid.org.uk](mailto:privacy@afid.org.uk) or at AfID offices, Britannia House, 11 Glenthorne Road, Hammersmith, London, UK, W6 0LH. Any questions regarding this Policy and our privacy practices should be sent by either of the above-mentioned email or address.

- If you are dissatisfied with any aspect of our Privacy Policy, you may have legal rights and, where relevant, we have described these as well.
- This policy is subject to periodic review and any changes will be included in this section of the site.

## Definitions

Word	Refers To
AfID, us or we	Accounting for International Development and/or AfID (UK) LLP
Candidates	Job Applicants and Volunteers collectively
Clients	Any individual or organisation (charities, INGOs, social enterprises or companies) who contacts AfID with the request to engage our services and recruit Candidates for pro bono or salaried roles in the UK and/or overseas.
Emergency Contacts	Individuals who are nominated by candidates or staff to contact in the event of an emergency.
Job Applicants	Individuals who have contacted AfID to express an interest in a salaried role that is advertised on our website, social media or external website, and with the intention of engaging AfID as an agency to source him/her a paid role.
Referee	Any individual who is nominated to vouch for the professional experience of Candidates or Staff, or offer their experience of working for a Client
Staff	An individual who is employed by AfID
Suppliers	Any individual or organisation that AfID engages as a service provider to ensure the smooth running of the office; this could be on a one-off or contractual basis.
Volunteers	Any individuals who have expressed an interest or are undertaking a pro bono placement in the UK or overseas through AfID.
Website Users	Individuals who visit AfID's website

## II. Who we are

AfID is a social enterprise, with its office in London, offering four services to Clients and Candidates:

- **Overseas Volunteering:** AfID offers candidates the opportunity to use their skills to support a broad range of not-profit organisations globally. Assignments of between 2 weeks and 12 months form part of an ongoing strategy to build the financial management capacity of clients.
- **UK Volunteering:** AfID supports UK-based Clients in sourcing Volunteers to undertake pro bono assignments in the UK and/or to take up Trustee or Treasurer posts.
- **Recruitment:** AfID offers a specialist recruitment service for our Clients in the UK and overseas.
- **Workshop:** AfID delivers a workshop 'Building International NGO capacity through Financial Management', several times a year.

### III. WHAT PERSONAL INFORMATION DO WE COLLECT, AND WHY?

**CANDIDATE DATA:** AfID needs to collect and use certain information about Candidates in order to provide them with a tailored service, to meet our contractual obligations to clients, and to keep them updated with relevant information and opportunities.

**3. 1. Volunteers:** AfID needs to collect and use information about you in order to enter into a contractual relationship with you, to send you invoices and/or receipts, to tailor assignments based on your preferences, experience and availability, to meet with our contractual obligations with our clients, and to evaluate the success of our overseas pro bono programme.

- We will collect the following information: full name, address, age, contact details, work & travel experience, and when agreed, payment details. To meet our contractual obligation to our clients we will collect you: CV, passport copy, accounting qualification, Disclosure & Barring Services (DBS) check or police check, and references.
- Where appropriate and in accordance with local laws and requirements, we may also collect information related to your health and diversity.

**3.2. Job applicants:** AfID needs to collect and use information about you in order to represent you as an agency for jobs you have applied for or jobs that we believe you would be well-suited to, and to meet with our contractual obligation with our Clients.

- We will collect the following information: full name, address, contact details, work & travel experience, CV, accounting qualifications.
- We may additionally collect: Proof of residence or UK work permit, passport copy, references, and payment details.

**3.3. Workshop participants:** In order to register your interest for a Workshop, book your place, issue an invoice or receipt, and send you details about the day, we will collect you: name, address, contact details, and payment details.

Any personal or bank details collected for the purpose of processing payments of the fees are destroyed immediately at the confirmation of successful processing of payment.

**CLIENT DATA:** If you are an AfID client, we will need to collect and use information about you, or individuals at your organisation, in the course of providing you with one or more of our services. We will collect: full name and contact details of key staff, physical address of the office. Our Terms & Conditions, which are shared with Clients will provide further details on mutual rights and obligations.

**SUPPLIER DATA:** In order of the smooth running of our organisation, we will need to collect and use information from our Suppliers. This includes: Full name, business address, contact details of staff, and bank details (if a payment forms part of our contractual agreement with our suppliers).

#### **STAFF DATA:**

- In order for staff to enter into employment with AfID, and in order to be paid a salary and other contributions, we will collect: full name, address, copy of passport and right to work in the UK, contact details of referees, NI number, and bank details.
- We also hold information about next of kin in the event we need to contact them during an emergency. We will collect: full name, contact details and relationship to staff.

## **PEOPLE WHOSE DATA WE RECEIVE FROM CANDIDATES AND STAFF**

**a. REFEREES:** In order to meet our contractual obligations to our Clients (in the case of Candidates), in order to enter employment with AfID (for Staff), and in order to complete our due diligence process when onboarding a Client, we will collect references.

We would ask Candidates, Clients and Staff to provide the following data for their referees: Full name, contact details, details of position held, and relationship with the Candidate, Client or Staff

We will hold this details, as well as the reference forms you submit to us, for a period of 6 years after the candidate has returned from placement or the employment has terminated.

**b. EMERGENCY CONTACTS:** All volunteers who have confirmed to go on an overseas pro bono placement, and Staff must provide with details of next of kin for AfID to contact in case of an emergency.

We will collect: Full name, contact details, and information on relationship with the Volunteer/Staff.

Candidates, Clients and Staff are responsible for notifying their nominated referees and emergency contacts and obtaining their consent before sharing their personal information with AfID. If, as a referee or an emergency contact, in any moment you do not wish us to contact you anymore, you can notify us at any time.

We will hold these information until the candidate has returned from placement, or in the case of staff, until the employment had terminated.

**WEBSITE USERS:** We collect a limited amount of data from our Website Users which we use to help us to improve your experience when using our website and to help us manage the services we provide. This includes information such as how you use our website, the frequency with which you access our website, and the times that our website is most popular.

## **IV. How do we collect your personal data?**

**CANDIDATE DATA:** We collect the personal data of Candidates in three primary ways:

### **1. Personal data that you, the Candidate, give us by:**

- Entering your details on the AfID website or via either an “Express Interest” form or a Registration form, as part of the registration process;
- Emailing your CV to an AfID designated contact;
- Applying for roles/ jobs through a job aggregator or social media platform, which then redirects you to the AfID website or AfID email;
- Participating in a poll or a competition through our website or a social media channel such as Facebook, Twitter or LinkedIn.
- Subscribing to a service or to our newsletter
- Booking a place at one of our events.
- Providing content for inclusion on our website.

### **2. Personal data that we receive from other sources**

Depending on the relevant circumstances and applicable local laws and requirements, these may include personal data received in the following situations:

- Your referees may disclose personal information about you;
- We may obtain information about you from searching for potential Candidates from third party sources, such as LinkedIn and/or other job sites;
- If you 'like' our page on Facebook or 'follow' us on Twitter or LinkedIn, we will receive your personal information from those sites;
- If you open our newsletter or other marketing material, we will receive information about your preferences from MailChimp.

### **3. Personal data that we collect automatically.**

To the extent that you access our website or read or click on an email from us, where appropriate and in accordance with any local laws and requirements, we may also collect your data automatically or through you providing it to us. (e.g.: Mail Chimp, Google analytics stats)

**CLIENT DATA** We collect Client personal data in two ways:

#### **1. Personal data that we receive directly from you**

We will receive data directly from you in two ways:

- Where you contact us proactively, usually by phone or email; and/or
- Where we contact you, either by phone or email, or through our team's business development activities more generally.

#### **2. Personal data that we receive from other sources**

Where appropriate and in accordance with any local laws and requirements, we may seek more information about you or your colleagues from other sources generally by way of due diligence or other market intelligence including:

- From third party market research and by analysing online and offline media (which we only do ourselves);
- From other limited sources and third parties (for example from our existing partners to the extent that they provide us with your details to act as a referee for them).

### **PEOPLE WHOSE DATA WE RECEIVE FROM CANDIDATES AND STAFF, SUCH AS REFEREES AND EMERGENCY CONTACTS:**

We will receive these details from our Candidates or staff, either via our Registration Form on our website, or by email. The candidates are responsible to notify their referees or emergency contacts that they have provided your personal details to AfID and get your consent. If in any moment you do not wish us to contact you any further, you just need to let us know.

**WEBSITE USERS:** When you visit our website there is certain information that we may automatically collect, whether or not you decide to use our services. This includes your IP

address, the date and the times and frequency with which you access the website and the way you browse its content.

We collect your data automatically via cookies, in line with cookie settings in your browser. If you are also a Candidate or Client of AfID, we may use data from your use of our website to enhance other aspects of our communications with or service to you. You may also choose to provide additional voluntary information in the course of your use of this website. In addition, we may automatically collect information about the website that you came from or are going to. We also collect information about the pages of this website which you visit, IP addresses, the type of browser you use and the times you access this website. However, this information is aggregated and is not used to identify you.

### **Payment and Bank details:**

For both Candidates, clients and suppliers, we offer the possibility to make payments by phone. We will collect your payment details on the phone and introduce it in our payment processor's system, in order to process payment. Once the payment has been processed, all details are deleted and destroyed. Our payment processor is WorldPay and you can refer to their Privacy Policy here: <https://www.worldpay.com/uk/privacy-policy>

We will also keep a record of any financial transactions you make with us (name, type of transaction, amount and date), as well as a record of all our invoices and receipts, for legal and audit purposes. We also might use the historical data to offer you any discounts on future payments.

## **V. How do we use your personal data?**

Having obtained data about you, we then use it in a number of ways.

**CANDIDATE DATA:** We generally use Candidate data in 4 ways:

- **Tailored Assignments**
- **Recruitment Activities;**
- **Marketing Activities;**
- **To help us to establish, exercise or defend legal claims.**

Our 2 main areas of focus are creating tailored volunteering assignments and recruitment – either for pro-bono or paid roles, we are connecting the right Candidates with the right placements or jobs. We've listed below various ways in which we may use and process your personal data for this purpose, where appropriate and in accordance with any local laws and requirements. Please note that this list is not exhaustive.

### **Tailored Assignments:**

- We will use the data we collected in order to create a personal profile (through your Registration Form) and provide tailored options of assignments for you to choose from.

- We will communicate with you in the base of our contractual relationship, in order to confirm or clarify certain details regarding your availability or preferences.
- We will share your CV, upon receiving your consent, with the partners we consider suitable for your options, in order to confirm the roles and assignments.
- We will store your data and reports from assignment, in base of our contractual agreement, for our records and to use as recommendations and feedback for future volunteers.
- Inviting you to participate in our specialist Workshop;
- Carrying out our obligations arising from any contracts entered into between us;
- Carrying out our obligations arising from any contracts entered into between AfID and third parties (e.g.: our national and international partners: charities, NGOs, INGOs, social enterprises) in relation to your assignment (e.g. Carrying due diligence checks and collecting references).
- Facilitating our invoicing processes;
- Carrying out surveys;
- Verifying details you have provided, by requesting further information (such as references, qualifications and potentially any criminal convictions, to the extent that this is appropriate and in accordance with local laws);
- Processing your data to enable us to send you targeted, relevant marketing materials or other communications which we think are likely to be of interest to you.

### **Recruitment Activities**

- Collecting your data from you (email, online application,) and other sources, such as jobs sites or LinkedIn;
- Storing your details (and updating them when necessary) on our database, so that we can contact you in relation to job opportunities;
- Providing you with our tailored services and to facilitate the recruitment process;
- Assessing data about you against vacancies which we think may be suitable for you;
- Sending your information to Clients, in order to apply for roles or to assess your eligibility for jobs, only after you have given us consent to do so.
- Carrying out our obligations arising from any contracts entered into between us;
- Carrying out our obligations arising from any contracts entered into between AfID and third parties (e.g.: our national and international partners: charities, NGOs, INGOs, social enterprises) in relation to your recruitment (e.g. Carrying due diligence checks and collecting references).
- Facilitating our invoicing processes;
- Carrying out surveys;
- Processing your data to enable us to send you targeted, relevant marketing materials or other communications which we think are likely to be of interest to you.

We may use your personal data for the above purposes if we deem it necessary to do so for our legitimate interests. If you are not happy about this, in certain circumstances you have the right

to object and request we delete your personal details from our databases as well you can request us to stop contacting you.

## **Marketing Activities**

We may periodically send you information that we think you may find interesting. In particular, we may wish to use your data for the purposes listed below, where appropriate and in accordance with any local laws and requirements. Please note that this list is not exhaustive.

To:

- enable us to develop and market other roles suitable to the interests you have mentioned to us in your earlier communications.
- market our full range of recruitment services (permanent, temporary, contract, UK or overseas) to you, as well as inviting you to relevant training and events;
- provide you with information about certain discounts and offers that you are eligible for by virtue of your relationship with AfID.

## **CONSENT**

We need your consent for some aspects of these activities which are not covered by our legitimate interests (in particular, the collection of data via cookies, and the delivery of direct marketing to you through digital channels) and, depending on the situation, we'll ask for this via an opt-in or soft opt-in solutions.

In certain circumstances, we are required to obtain your consent to the processing of your personal data in relation to certain activities. Depending on exactly what we are doing with your information, this consent will be opt-in consent or soft opt-in consent.

Article 4(11) of the GDPR states that **(opt-in) consent** is "any freely given, specific, informed and unambiguous indication of the data subject's wishes by which he or she, by a statement or by a clear affirmative action, signifies agreement to the processing of personal data relating to him or her." In plain language, this means that:

- you have to give us your consent freely, without us putting you under any type of pressure;
- you have to know what you are consenting to – so we'll make sure we give you enough information;
- you should have control over which processing activities you consent to and which you don't. We provide these finer controls within our privacy preference centre; and
- you need to take positive and affirmative action in giving us your consent – we're likely to provide a tick box for you to check so that this requirement is met in a clear and unambiguous fashion.

We will keep records of the consents that you have given in this way.



**Soft opt-in consent** is a specific type of consent which applies where you have previously engaged with us (for example by submitting a job application or CV, or registering a vacancy to be filled), and we are marketing other recruitment-related services. Under 'soft opt-in' consent, we will take your consent as given unless or until you opt out. For most people, this is beneficial as it allows us to suggest other jobs to you alongside the specific one you applied for, significantly increasing the likelihood of us finding you a new position. For other types of e-marketing, we are required to obtain your explicit consent.

If you are not happy about our approach to marketing, you have the right to withdraw your consent at any time either by direct email or unsubscribe option. We want to let you know that even if you have opted out from our marketing communications, it is possible that your details may be recaptured through public sources in an unconnected marketing campaign. We will try to make sure this doesn't happen, but if it does, we apologize and we will just ask that in those circumstances you opt out again.

All our marketing is based on what we think will serve our Clients and Candidates best, so we may use your data to show you AfID adverts and other content on other websites, for example Facebook. If you do not want us to use your data in this way, please turn off the "Advertising Cookies" option. Even where you have turned off advertising cookies, it is still possible that you may see an AfID advert, but in this case it won't have been targeted at you personally, but rather at an anonymous audience.

### **To help us to establish, exercise or defend legal claims**

In more unusual circumstances, we may use your personal data to help us to establish, exercise or defend legal claims. In this sense, we may store your Registration Form and all details provided there for a number of 7 years prior to your end of assignment date, as this is our contractual base on which we send volunteers in overseas assignments (signed T&Cs).

**CLIENT DATA:** We use Client information for:

- Recruitment Activities;
- Marketing Activities; and
- To help us to establish, exercise or defend legal claims.

Here are some more details about each:

#### **Recruitment Activities**

With our organizational partners, our main area of work is recruitment, through: providing you with Candidates, either as pro-bono consultants or as paid employees (permanent or contractors). We've listed below the various ways in which we use your data in order to facilitate this.

- Storing your details (and updating them when necessary) on our database, so that we can contact you in relation to recruitment activities;

- Keeping records of our conversations and meetings, so that we can provide targeted services to you;
- Undertaking customer satisfaction surveys;
- Processing your data for the purpose of targeting appropriate marketing campaigns.

We may use your personal data for these purposes if we deem this to be necessary for our legitimate or contractual interests.

### **Marketing Activities**

As part of the consent you have provided by signing our T&Cs when entering in a partnership with us, we will send you marketing materials such as our newsletters and targeted campaigns (e.g.: asking if you are looking for further pro-bono support in a certain period of time) to your provided email address.

If you are not happy about this, you have the right to opt out of receiving marketing materials from us at any time.

### **To help us to establish, exercise or defend legal claims**

As part of our T&Cs and our contractual relationship with our partners, specifically the ones to whom we offer pro-bono placements, we require the partner to provide detailed information about the organization and their staff, as well to disclose information on their financial activity, safeguarding policies and child protection policies.

**SUPPLIER DATA:** We will use your information for the following:

- To store (and update when necessary) your details on our database, so that we can contact you in relation to our agreements;
- To offer services to you or to obtain support and services from you;
- To perform certain legal obligations;
- To help us to target appropriate marketing campaigns;
- In more unusual circumstances, to help us to establish, exercise or defend legal claims.

We may use your personal data for these purposes if we deem this to be necessary for our legitimate interests. We will not, as a matter of course, seek your consent when sending marketing messages to a corporate postal or email address. If you are not happy about this, in certain circumstances you have the right to object and can find out more about how to do so here.

**PEOPLE WHOSE DATA WE RECEIVE FROM CANDIDATES AND STAFF, SUCH AS REFEREES AND EMERGENCY CONTACTS:** We will only use the information that our Candidate gives us about you for the following purposes:

- If our Candidates or Staff members put you down on our form as an emergency contact, we'll contact you in the case of an accident or emergency affecting them; or

- If you were put down by our Candidate or a prospective member of Staff as a referee, we will contact you in order to take up a reference. This is an important part of our Candidate quality assurance process, and could be the difference between the individual getting a job or not.

- If you were put down by our Candidate or a prospective member of Staff as a referee, by completing the reference form and sending it back to us you will give your consent for us to store this information in our archives, as per our legitimate interest.

**WEBSITE USERS:** We use your data for our internal report (from Google Analytics), to help us determine the functionality of the website and its pages, as well as the main focuses of our visitors, all to help us improve users' experience.

If you would like to find out more about cookies, including how we use them and what choices are available to you, please see our Cookie chapter below.

### **Payment and Bank details:**

For both Candidates, clients and suppliers, we offer the possibility to make payments by phone. We will collect your payment details on the phone and introduce it in our payment processor's system, in order to process payment. Once the payment has been processed, all details are deleted from any records. Our payment processor is WorldPay and you can refer to their Privacy Policy here: <https://www.worldpay.com/uk/privacy-policy>

We will also keep a record of any financial transaction you make with us (name, type of transaction, amount and date), as well as a record of all our invoices, for legal and audit purposes. We also might use the historical data to offer you any discounts on future payments or collaborations.

## **VI. Who do we share your personal data with?**

We will not sell or rent your information to third parties.

We will not share your information with third parties without your express consent.

We will only share your information with the partners for whom you have applied or expressed interest for us to share your CV with. For candidates that apply for paid roles, we will only share your CV with the partner for whom you have applied for, and if we consider you suitable for any other roles, we will always ask you for a new consent before we share your CV.

For candidates that register for an overseas volunteering assignment, we might share your CV with our international partners who we consider suitable for a tailored placement for you. However please note that we disclose only the personal information that is necessary to deliver the service and we have a contract in place that requires them to keep your information secure and not to use it for any other purposes. Please be reassured that we will not release your information to third parties beyond the AfID Network of verified partners or volunteers.

It might be that, for the purpose of providing a good service to future volunteers, we might share your contact details with volunteers who want to go to the same organisation or region as you do, but we will do this only after having your consent.

We will also share Personal Data with third-party service providers. For example, we use third parties to provide:

- our IT and cloud services, and to operate and manage these services;
- marketing services; (e.g.: MailChimp)
- Banking services. (e.g.: WorldPay)

All of our third-party service providers are required to take commercially reasonable and appropriate security measures to protect your personal data.

## **VII. How do we store and transfer your data internationally? / Data transfers**

We will share Personal Data with third parties where we are required by law, where it is necessary to administer our relationships between clients and candidates, or where we have another legitimate interest in doing so.

We have a global network of partners and accordingly Personal Data may be transferred to our partners when we believe it is in your best interest or to enable us to deliver our service. This may result in Personal Data being transferred outside the countries where our clients or partners are located. This includes to countries outside the European Union (EU). These countries may not have similar data protection laws to the UK. By submitting your personal data, you're agreeing to this transfer, storing or processing. If we transfer your information outside of the EU in this way, we will take steps to ensure that appropriate security measures are taken with the aim of ensuring that your privacy rights continue to be protected as outlined in this Policy.

## **VIII. How do we safeguard your personal data?**

We are committed to taking all reasonable and appropriate steps to protect the personal information that we hold from misuse, loss, or unauthorised access. We do this by having in place a range of appropriate technical and organisational measures. These include measures to deal with any suspected data breach.

Any sensitive payment information (such as credit or debit card details) is encrypted and protected with the following software TLS v1.1, offered by our payment processor WorldPay. You can find WorldPay's Privacy Policy here: <https://www.worldpay.com/uk/privacy-policy>

Other sensitive information like your nationality, sexual orientation, health issues, which you chose to share with us, will be kept confidential and secured in our database, which is password protected. All sensitive information that is not needed for our due diligence, service delivery or legal purposes, will be deleted upon your return from placement.

Non-sensitive details are transmitted normally over the Internet (e.g.: email), and this can never be guaranteed to be 100% secure. As a result, while we strive to protect your personal information, we cannot guarantee the security of any information you transmit to us, and you

do so at your own risk. Once we receive your information, we make our best effort to ensure its security on our systems.

If you suspect any misuse or loss of or unauthorised access to your personal information please let us know immediately.

## **IX. How long do we keep your personal data for? /Retention Policy**

We retain the Personal Data processed by us for as long as is considered necessary for the purpose for which it was collected (including as required by applicable law or regulation).

In the absence of specific legal, regulatory or contractual requirements, our standard retention period for records and other documentary evidence created in the provision of services is 7 years.

Our standard email retention period is 10 years.

We continually review our data retention policies, and we reserve the right to amend the above retention periods without notice.

Other records, which are not required to be retained as part of our professional services, will be kept for a period of time depending on:

- the type, amount and categories of Personal Data we have collected;
- the requirements of our business and the services we provide;
- the purposes for which we originally collected the Personal Data;
- the lawful grounds upon which we based our processing;
- any relevant legal or regulatory obligations;
- whether the purpose of the processing could be reasonably fulfilled by other means.

## **X. How can you access, amend or take back the personal data that you have given to us?**

Even if we already hold your personal data, you still have various rights in relation to it. To get in touch about these, please contact us. We will seek to deal with your request without undue delay, and in any event in accordance with the requirements of any applicable laws. Please note that we may keep a record of your communications to help us resolve any issues which you raise.

**Right to object:** If we are using your data because we deem it necessary for our legitimate interests to do so, and you do not agree, you have the right to object. We will respond to your request within 30 days (although we may be allowed to extend this period in certain cases). Generally, we will only disagree with you if certain limited conditions apply.

**Right to withdraw consent:** Where we have obtained your consent to process your personal data for certain activities (for example, for profiling your suitability for certain roles), or consent to market to you, you may withdraw your consent at any time.

**Data Subject Access Requests (DSAR):** You have the right to ask us to confirm what information we hold about you at any time, and you may ask us to modify, update or Delete such information. At this point we may comply with your request or, additionally do one of the following:

- we may ask you to verify your identity, or ask for more information about your request; and
- where we are legally permitted to do so, we may decline your request, but we will explain why if we do so.

**Right to erasure:** In certain situations you have the right to request us to "erase" your personal data. We will respond to your request within 30 days (although we may be allowed to extend this period in certain cases) and will only disagree with you if certain limited conditions apply. If we do agree to your request, we will Delete your data but will generally assume that you would prefer us to keep a note of your name on our register of individuals who would prefer not to be contacted. That way, we will minimise the chances of you being contacted in the future where your data are collected in unconnected circumstances. If you would prefer us not to do this, you are free to say so.

**Right of data portability:** If you wish, you have the right to transfer your data from us to another data controller. We will help with this – either by directly transferring your data for you, or by providing you with a copy in a commonly used machine-readable format.

**Right to lodge a complaint** with a supervisory authority: You also have the right to lodge a complaint with your local supervisory authority.

If your interests or requirements change, you can **unsubscribe** from part or all of our marketing content (for example job role emails or newsletters) by clicking the unsubscribe link in the email, or by contacting us directly.

## **XI. Cookies and related tracking technologies**

### **Use of Cookies on our website**

We use cookies to collect information about store your online preference. Cookies are small pieces of information sent by a web server to a web browser which allows the server to uniquely identify the browser on each page.

We use the following categories of cookies on our website:

#### **Performance Cookies**

These cookies collect anonymous information on how people use our website. For example, we use Google Analytics cookies to help us understand how customers arrive at our site, browse or use our site and highlight areas where we can improve areas such as navigation experience and marketing campaigns. The data stored by these cookies never shows personal details from which your individual identity can be established.

### **Functionality Cookies**

These cookies remember choices you make such as the country you visit our website from, language and search parameters such as size, colour or product line. These can then be used to provide you with an experience more appropriate to your selections and to make the visits more tailored and pleasant. The information these cookies collect may be anonymised and they cannot track your browsing activity on other websites.

### **Targeting Cookies or Advertising Cookies**

These cookies collect information about your browsing habits in order to make advertising more relevant to you and your interests. They are also used to limit the number of times you see an advert as well as help measure the effectiveness of an advertising campaign. The cookies are usually placed by third party advertising networks. They remember the websites you visit and that information is shared with other parties such as advertisers.

### **Social Media Cookies**

These cookies allow you to share what you've been doing on the website on social media such as Facebook and Twitter. These cookies are not within our control. Please refer to the respective privacy policies for how their cookies work.

If you want to delete any cookies that are already on your computer, please refer to the help and support area on your internet browser for instructions on how to locate the file or directory that stores cookies.

Please note that by deleting our cookies or disabling future cookies you may not be able to access certain areas or features of our site. To find out more about cookies please visit: [www.allaboutcookies.org](http://www.allaboutcookies.org) or see [www.youronlinechoices.eu](http://www.youronlinechoices.eu) which contains further information about behavioural advertising and online privacy.

### **How to reject cookies**

If you don't want to receive cookies that are not strictly necessary to perform basic features of our site, you may choose to opt-out by changing your browser settings.

Most web browsers will accept cookies but if you would rather we didn't collect data in this way you can choose to accept all or some, or reject cookies in your browser's privacy settings. However, rejecting all cookies means that you may not be able to take full advantage of all our website's features. Each browser is different, so check the "Help" menu of your browser to learn how to change your cookie preferences.

For more information generally on cookies, including how to disable them, please refer to [aboutcookies.org](http://aboutcookies.org). You will also find details on how to delete cookies from your computer.

## **XII. Links to other websites**

Our website may contain links to other websites run by other organisations. This privacy policy applies only to our website, so we encourage you to read the privacy statements on the other websites you visit. We cannot be responsible for the privacy policies and practices of other sites even if you access them using links from our website.

In addition, if you linked to our website from a third party site, we cannot be responsible for the privacy policies and practices of the owners and operators of that third party site and recommend that you check the policy of that third party site.

### **XIII. Our legal bases for processing your data**

#### **LEGITIMATE INTERESTS**

Article 6(1)(f) of the GDPR says that we can process your data where it "is necessary for the purposes of the legitimate interests pursued by [us] or by a third party, except where such interests are overridden by the interests or fundamental rights or freedoms of [you] which require protection of personal data."

We don't think that any of the following activities prejudice individuals in any way – in fact, they help us to offer you a more tailored, efficient service. However, you do have the right to object to us processing your personal data on this basis.

#### **CANDIDATE DATA:**

We think it's reasonable to expect that if you are looking for employment or have posted your professional CV information on a job board or professional networking site, you are happy for us to collect and otherwise use your personal data to offer or provide our recruitment services to you, share that information with prospective employers and assess your skills against our bank of vacancies. Once it's looking like you may get the job, your prospective employer / host organization may also want to double check any information you've given us (such as qualifications) or to confirm your references, qualifications and criminal record, to the extent that this is appropriate and in accordance with local laws.

We want to provide you with tailored assignment options or job recommendations. We therefore think it's reasonable for us to process your data to make sure that we send you the most appropriate content.

We also think that it might help with your future volunteering assignment job search if you take part in our specialist training or Workshop, if you have the time. These are part of our service offering as a business, and help differentiate us in a competitive marketplace, so it is in our legitimate interests to use your data for this reason.

We have to make sure our business runs smoothly, so that we can carry on providing services to Candidates like you. We therefore also need to use your data for our internal administrative activities, like payroll and invoicing where relevant.

#### **PEOPLE WHOSE DATA WE RECEIVE FROM CANDIDATES AND STAFF, SUCH AS REFEREES AND EMERGENCY CONTACTS:**

If you have been put down by a Candidate or a prospective member of Staff as one of their referees, we use your personal data in order to contact you for a reference. This is a part of our



quality assurance procedure and so we deem this to be necessary for our legitimate interests as an organisation offering recruitment services and employing people ourselves.

If a Candidate or Staff member has given us your details as an emergency contact, we will use these details to contact you in the case of an accident or emergency. We are sure you will agree that this is a vital element of our people-orientated organisation, and so is necessary for our legitimate interests.

### **ESTABLISHING, EXERCISING OR DEFENDING LEGAL CLAIMS**

Sometimes it may be necessary for us to process personal data and, where appropriate and in accordance with local laws and requirements, sensitive personal data in connection with exercising or defending legal claims. Article 9(2)(f) of the GDPR allows this where the processing "is necessary for the establishment, exercise or defence of legal claims or whenever courts are acting in their judicial capacity".

This may arise for example where we need to take legal advice in relation to legal proceedings or are required by law to preserve or disclose certain information as part of the legal process.

## **XIV. CHANGES TO OUR PRIVACY POLICY**

If our Privacy Policy changes in any way, we will place an updated version on this page. Regularly reviewing this page ensures that you are always aware of what personal information we collect, how we use it and under what circumstances, if any, we will share it with other parties.

## **HOW TO CONTACT US**

If you have any questions about this statement or your personal information, please contact us at [privacy@afid.org.uk](mailto:privacy@afid.org.uk).