

PRIVACY POLICY

Effective as of January 1, 2020

When you sign up to FROM Wales as a charity supporter, you're trusting us with personal information. We are committed to keeping that trust, which is why our policy as a charity is to take every step to ensure that individual user's data and privacy rights are protected and to provide transparency about our data practices.

The main purpose of our Privacy Policy is to provide a clear understanding of what data we collect, how it is used and shared, and how you can control it.

We recommend that you read this Privacy Policy in full,, but here are a few key takeaways we hope you will find useful:

THE DATA THAT SERVES YOU

When you give us information about yourself and allow us to connect with you, your feedback and use of our site and social platforms allows us to improve the information we distribute about our work.

YOU CAN CONTRIBUTE TO THE GROWTH OF THE FROM WALES COMMUNITY

Provided we receive your consent, we may use technical information about you (your unique technical identifier, age group, subscription status) for promotion purposes to reach more people like you. You can always withdraw your consent to share this data.

YOU ARE IN CONTROL

You may access your Personal data, modify, correct, erase, and update it by writing to us at support@fromwales.org You may also download the information FROM Wales has collected about you by contacting us. If you have questions about this policy, how we collect or process your personal data, or anything else related to our privacy practices.

YOUR DATA IS SAFE WITH FROM WALES

We take all reasonable and appropriate measures to protect your Personal data from loss, theft, misuse or unauthorized access.

INTRODUCTION

This Privacy Policy explains how FROM Wales UK Charity 1149385 (“Charity” or “we” or “us”) collects, stores, uses, transfers and shares Personal data from our users (“you”) in connection with:

- FROM Wales website ("Website"),
- FROM Wales Social and related services (“Web services”)

We reserve the right to and may change this Privacy Policy from time to time. If we make any material changes, we will notify you by email (sent to the email address specified when you register), or by presenting you with a new version of this Privacy Policy. **Please review our Website the latest updates on our data privacy practices.**

1. PERSONAL DATA AND INFORMATION WE COLLECT FROM YOU

Personal data you provide us directly

General Information. we may collect Personal data about you such as:

- Full name;
- Email address;
- Gender;
- Date of birth;
- Place of residence and associated location information;
- Interests relating to the Charity

Personal data we may collect automatically

When you access or use our website, we may automatically collect the following information:

Device Information:

- Hardware model;
- Information about operating system and its version;
- Unique device identifiers (e.g. IDFA)

Location Information:

- IP address;
- Time zone;

Website usage data, including, among others:

- Frequency of use;
- Areas and features of our website you visit;
- Your use patterns generally;
- Engagement with particular features.

To collect this information, we may also send cookies to your mobile device or computer or engage other tracking technologies. Cookies are small data files stored on your hard drive or in device memory. See more in our [Cookie Policy](#).

Data from external sources. We may use third-party tools like Facebook and Google analytics that provide us some of your attribution data that we further utilize to customize and personalize our communication with you. We may also use such data for statistical purposes and analytics.

YOUR CONSENT

By using our website or signing up to our charity you explicitly consent that:

I. WE MAY STORE AND PROCESS YOUR PERSONAL DATA YOU PROVIDE THROUGH THE USAGE OF THE WEBSITE SOLELY FOR THE PURPOSES INDICATED IN SECTION 2 OF THIS PRIVACY POLICY. SUCH PURPOSES MAY INCLUDE SENDING YOU INFORMATION AND UPDATES ABOUT THE CHAIRTY TO YOUR EMAIL ADDRESS.

II. WE WILL NOT TRANSMIT ANY OF YOUR PERSONAL DATA TO THIRD PARTIES UNLESS OTHERWISE IS PROVIDED BY THIS PRIVACY POLICY.

PLEASE NOTE THAT WE WILL NEVER SHARE YOUR EXACT AGE OR ANY DATA RELATED TO YOUR HEALTH AND WELLBEING WITH ANY THIRD PARTIES.

2. HOW WE USE YOUR PERSONAL DATA

Purposes of processing

We may use your Personal data, for the following purposes:

- to analyze, operate, maintain and improve our communication with you.
- to provide and deliver the products and services you request, process transactions and send you related information, including confirmations and reminders;
- to customize product and service offerings and recommendations to you.
- to verify your identity.
- to send you technical notices, updates, security alerts and support and administrative messages;
- for fund collection, other administrative purposes, if applies;
- to respond to your comments, questions and requests and provide customer service;
- to monitor and analyze trends, usage and activities relating to the Charity
- solely with respect to information that you mark for sharing, for Company promotional purposes.
- to link or combine with information we get from others or (and) from you to help understand your needs and provide you with better service (to use in training of neural networks, artificial intelligence);
- for scientific and academic research purposes; and

- for any other purposes disclosed to you at the time we collect Personal data or any other purposes indicated in this Privacy Policy.

We will never sell your Personal data as may be defined by applicable laws.

Principles of processing

Data minimization and purpose limitation. We will not process Personal data in a way that is incompatible with the purposes for which it has been collected or subsequently authorized by you or collect any Personal data that is not needed for the mentioned purposes. For any new purpose of processing we will ask your separate explicit consent. To the extent necessary for those purposes, we take all reasonable steps to ensure that Personal Data is reliable for its intended use, accurate, complete, and current. We also undertake to collect only such amount and type of Personal data that is strictly needed for the mentioned purposes.

No sale of Personal data. We will never sell, rent, or disclose your Personal data. We may share only some of your Personal data to our service providers strictly limited to cases and purposes stipulated in this Privacy Policy.

3. YOUR PRIVACY RIGHTS

Notwithstanding the country or region you are coming from we are committed to grant you the vast privacy rights in respect to your Personal data.

What rights?

- **Correction of Personal data.** If you believe that your Personal data is inaccurate, you have right to contact us and ask us to correct such Personal data.
- **Restriction of Processing.** You also have a right to request restriction of processing of your Personal data, if you contest the accuracy of the Personal data and we need some time to verify its accuracy.
- **Information rights and access to your Personal data (including in portable form).** You shall have a right to request information about what Personal data we have about you, to access your Personal data and receive a copy of it.
- **Erasure of your Personal data.** You have a right to contact us and ask us to erase Personal data.
- **Right to object processing of your Personal data.** In some cases you can object processing your Personal data and stop us from processing your Personal data (for example, if we process it under legitimate interest basis).
- **Right to object (opt-out) automated decision-making:**

How to exercise your privacy rights

Simply write us at support@fromwales.org to exercise any of your privacy rights.

We commit to grant them within 30 days after receipt. It may take us up to 90 days in some cases, for example for full erasure of your Personal data stored in our backup systems. This is due to the size and complexity of the systems we use to store Personal data.

Formalities to exercise your privacy rights

Please keep in mind that in case of a vague request we may engage the individual in a dialogue so as to better understand the motivation and content of the request. We may also refuse manifestly unfounded and excessive (repetitive) requests.

We might also require you to prove your identity in some cases. This is made to ensure that no rights of third parties are violated by your request.

What else?

Notification requirements. We commit to notify you, when it is needed under the law, within a reasonable period of time and your data protection authority within the timeframe specified in applicable law about Personal data breaches related to your Personal data.

Data Protection Authorities. Subject to applicable laws, you may have the right to lodge a complaint with your local data protection authority about any of our activities that you deem are not compliant with applicable law.

4. THIRD PARTIES PROCESSING YOUR PERSONAL DATA

We will not share your Personal data with any third parties except as specified below.

Processing to find new FROM Wales users

Provided we receive your **consent**, we may share some of your Personal data with Facebook marketing and google analytics. By using these platforms we are able to reach more people like you and spread the word about the Charity and the projects and programmes it supports in Malawi, Africa.

To accomplish the above-mentioned goal, we may share certain Personal data with Facebook ads and google analytics.

Here is a step-by-step illustration of how we utilize AppsFlyer and its integrated partners:

1. You become sign up to FROM Wales sharing Personal data, strictly limited to the following set:

a) Technical identifiers: IP address (which may also provide general location information), User agent, IDFA (Identifier for advertisers), Android ID (in Android devices), Google Advertiser ID, Customer issued user ID and other similar unique technical identifiers.

2. We will use your data with platforms such as (Google Ads, Apple Search Ads, FB marketing network, and a couple of others) to find people like you on different platforms, including social media websites. These platforms analyze your data (so-called “custom audience”) and show relevant information about the App to people who might be potentially interested in it (so-called “lookalike audience”).

3. **This is how new users find out about FROM Wales** learn about Malawi and the key work undertaken by Fisherman's Rest Community Projects in Blantyre Rural. You contribute to the growth of FROM Wales community through providing your consent to sign up and allow us to use your data as purposed in the privacy policy..

Opt-out options. You can withdraw your consent to sharing of your Personal data in accordance with this subsection anytime by using one of the following options:

1. By contacting us at support@fromwales.org
2. By adjusting your device settings in iOS or Android in order to stop sharing your IDFA or Android Advertising ID with any third parties. In such case no third party will be able to utilize your Personal data in accordance with this Section of the Privacy Policy.

Aggregated information

We may share aggregated, anonymized or de-identified information, which cannot reasonably be used to identify you for research purposes. However at present there is not such need to do so.

Special circumstances

We may also share some of your Personal data in the following special circumstances:

- in response to subpoenas, court orders or legal processes, to the extent permitted and as restricted by law (including to meet national security or law enforcement requirements);
- when disclosure is required to maintain the security and integrity of the organisation or to protect any user's security or the security of other persons, consistent with applicable laws. In such cases we may also delete some of your Personal data.
- when disclosure is directed or consented to by the user who has input the Personal data;
- in the event that we go through a business transition, such as a merger, divestiture, acquisition, liquidation or sale of all or a portion of its assets, your information will, in most instances, be part of the assets transferred.

5. RETENTION OF YOUR PERSONAL DATA

When you use our website

We will retain your Personal data as long as we are providing you services, and only for as long as it serves purposes of processing identified in Section 2 of this Privacy Policy. At any time, you can erase your Personal data in accordance with the Privacy Policy.

If you choose to unsubscribe we will retain your Personal data for a reasonable period thereafter in case you decide to re-activate the Services.

You should be aware that we may retain certain Personal data and other information after you have unsubscribed in an aggregated, anonymized form. We reserve the right to use your

information in any aggregated data collection after you have terminated your account, however we will ensure that the use of such information will not identify you personally. We will also retain your Personal data as necessary to comply with legal obligations, resolve disputes and enforce our agreements.

6. SECURITY OF YOUR PERSONAL DATA

We take all reasonable and appropriate measures to protect all collected Personal data from loss, theft, misuse and unauthorized access, disclosure, alteration and destruction,. Among others, we utilize the following information security measures to protect your Personal data:

- **Encryption** of your Personal data in transit and in rest;
- **Protection** of data integrity;
- **Organizational and legal measures.** To ensure safe handling of data

If we learn of a security systems breach, we may either post a notice, or attempt to notify you by email and will take reasonable steps to remedy the breach as specified in this Privacy Policy.

7. CHILDREN'S PRIVACY

General age limitation. We are committed to protecting the privacy of children. We do not store data on Children under 18 years of age.

8. COMMUNICATIONS

We may contact you via email or through other means to communicate with you about products, services, offers, promotions, rewards, and events offered by us, and provide news and information that we think will be of interest to you. You can always opt out of receiving emails by unsubscribing via the "Unsubscribe" link contained in the email.

9. STORAGE AND INTERNATIONAL PERSONAL DATA TRANSFERS

General

The Charity is based in the UK and under GDPR, please note other countries may not offer the same protections as the law of your jurisdiction.

In addition, you agree that Personal data collected may be stored and processed in the UK where the Charity operates or in any other country in which the Charity or its affiliates, subsidiaries or agents maintain facilities, and by signing up to the Charity, you consent to any such transfer of Personal data outside of your country.

10. CONTACT US

General. If you have any questions or concerns about your privacy, you may contact us at:
Email: support@fromwales.org FROM Wales – 137 Tudor Gardens, Haverforwest, PEMBROKESHIRE WALES SA61 1LQ