



Tibetan Education & Relief Association including Himalayan Communities (T.E.R.A.)
PRIVACY POLICY & GDPR-COMPLIANCE POLICY – Public Version 1.0

This combined Privacy Policy and GDPR-Compliance Policy applies to information collected online (e.g. the T.E.R.A. website, email) and offline (e.g. postal document)

The General Data Protection Regulation (GDPR) is a replacement to the Data Protection Act (DPA, 1998). It aims to standardise the way Personally Identifiable Information (PII) is dealt with in terms of Data Controllers (i.e. organisations that collect personal data) and Data Processors (i.e. a third party you share data with) and that exist within the EU, or countries operating outside of the EU that process data on EU nationals. It comes into force on 25 May 2018.

What is data retention?

Data Retention is defined by the Information Commissioner's Office as: *"Data kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed; personal data may be stored for longer periods insofar as the personal data will be processed solely for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes subject to implementation of the appropriate technical and organisational measures required by the GDPR in order to safeguard the rights and freedoms of individuals"*.

In plain English, data retention means that if data is no longer in use or required to be kept for a specific purpose then it should either be deleted altogether, or all parts of the information that would give away the identity of the individual should be anonymised. By dealing with data in this way we are adhering to the organisational and technical safeguards stipulated by the GDPR.

Who will be storing my information, and what information does the Tibetan Education & Relief Association collect, and through which channels?

The Trustees of the Tibetan Education and Relief Association will be storing your information. We only collect what is absolutely necessary for administrative purposes. We collect whatever information you - our supporters and donors - provide *voluntarily*, when you :

- i. fill out a 'Contact us' form on our website
- ii. make an online donation via one of the fundraising platforms that T.E.R.A. uses (e.g. Make a Donation, PayPal Giving Fund). Third-party websites that T.E.R.A. uses to engage with the public will have their **own policies** for collecting and using data from your use of their site (e.g. 'cookies'), so please make sure you are happy with their policies before using their websites (see below). *Please visit this website address for details about cookies:* <http://www.bbc.co.uk/webwise/guides/about-cookies>



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- iii. send a postal donation with accompanying personal details.
- iv. give **T.E.R.A.** a fully- or partially-completed Gift Aid declaration document.
- v. give a donation with your personal details to one of our Trustees.
- vi. ask us to include you on our mailing list (by post or email), or request more information from us about our charitable activities.
- vii. contact us in any way not covered above.

For all of the above, **T.E.R.A.** may – depending on what information you provide - collect all or some of the following: your title, name, address, email address, telephone number. We do not see your bank details unless you expose them intentionally to any of the **T.E.R.A.** Trustees. The www.tera-charity.org and www.tera-charity.ngo websites do not collect browsing data (through 'cookies'). When you view our social media pages, we cannot see that you have done so. You can make an anonymous donation on any of the online fundraising platforms that **T.E.R.A.** uses. You do not have to give your personal details when making a postal donation or in person.

Data controllers vs processors

A charity will generally be considered a Data Controller if it collects the data of supporters in order to engage and communicate with them in a variety of ways. The vast majority of charities will fit into the Data Controller category and will be 'processing' some data even if it that means just 'storing' the information. And it isn't just supporter data; it also applies to staff data, service user data, trustee data etc.

What do we use your information for?

Any of the information that you provide voluntarily may be used by **T.E.R.A.** in the following ways:

- i. To improve our service to you, our Trustees, and our beneficiaries
- ii. To improve our website (feedback is always appreciated, especially if you have problems using our website)
- iii. To process financial transactions
- iv. To claim Gift Aid (if you have completed a declaration)
- v. To send periodic emails and newsletters to you, if you have consented/opted-in to receiving information from us (please see below for the definition of **Consent** in this context)
- vi. To contact you when it is reasonable for us to do so, e.g. if you have sent us a message via any method and indicated that you require a reply; if there is a financial anomaly, e.g. a standing order has been paid twice (in which case you would need to know in case your bank has made an error and potentially caused you to go overdrawn).



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Are there any exceptions to opting-out of information from T.E.R.A.?

If you have opted-out of contact with **T.E.R.A.**, GDPR permits us to contact you by landline (unless you are registered with the Telephone Preference Service) or post if we have a 'legitimate interest', which we define as 'a situation where it is absolutely necessary for us to contact you with regards to accounting administration, or compliancy with the law and statutory regulations'.

How do I know I have consented to receiving information from T.E.R.A.?

Consent is defined as: *“Any freely given, specific, informed and unambiguous indication of his or her wishes by which the data subject, either by a statement or by a clear affirmative action, signifies agreement to personal data relating to them being processed”* – Information Commissioner’s Office

In plain English, this means that at the point of data collection (through whatever channel), we have to give you a statement that corresponds to what your information is being used for. Consent means offering you genuine choice and control over how we use your data. **You may withdraw your consent at any point by advising one of our Trustees.**

WE DO NOT CATEGORISE YOUR PERSONALLY-IDENTIFIABLE DATA, i.e. we do not store or filter our supporters’ data based on their gender, age, location, etc.

If, at any time, you would like to unsubscribe from **T.E.R.A.**’s mailing list, please use the Unsubscribe details at the bottom of our emails, send us a message via ‘Contact us’ on our website, or contact any of our Trustees.

How long do we retain your information?

We retain your personally-identifiable information for 2 years unless you are a donor, in which case it is retained for 5 years (to fulfill HMRC requirements) unless you ask us to delete your data (N.B. we may anonymise your data to allow for essential accounting functions). If you do not wish for us to be able to collect personally-identifiable information, you can still make an anonymous donation to **T.E.R.A.** via various methods. (**PLEASE NOTE:** If you are making Gift Aid donations to **T.E.R.A.**, we **MUST** have your personally-identifiable information for communications with HMRC.)

After 2 years, we will contact you again to ask if you wish to renew your consent.

If you request that your PII be deleted from our records, we will shred any paper records that have your PII recorded on them (if they are not necessary for charity administration); digital files will be permanently deleted (if they are not necessary for charity administration).



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How do we protect your information?

Your personal details are stored safely offline whenever possible by our Trustees, whose computers are password-protected and also have up-to-date anti-virus and security software. We do as much as we can to ensure that our charity records – both paper and digital – are kept private. We only use financial and fundraising platforms that we trust. We do not outsource work required to run our charity.

Do we use cookies and secure websites (https)?

The tera-charity.org website does NOT use cookies.

Do we disclose information to outside/external parties?

We do not sell, trade, or otherwise transfer to outside parties your personally-identifiable information. This does not include trusted third parties who assist us in operating our website, conducting our business, or servicing you, so long as those parties agree to keep this information confidential and do not charge T.E.R.A.. We may also release your information when we believe release is appropriate to comply with the law, enforce our site policies, or protect our or others' rights, property or safety. Presently, the only external party we *have* to share your information with is HMRC, if you have signed a Gift Aid declaration.

Third-party links

Occasionally, at our discretion, we may provide website links to third parties (e.g. Fundraising Regulator) on our website. These third-party sites have separate and independent privacy policies. We therefore have no responsibility or liability for the content and activities of these linked sites. Nonetheless, we seek to protect the integrity of our site and welcome any feedback about these site links.

Terms and conditions for using our website

By using our website, you consent to our Privacy Policy & GDPR-Compliance Policy and our Terms and Conditions for Using our Website, version 2.0