

POLICY: DATA PROTECTION AND PRIVACY

1. Policy Statement

Books2Africa respects your privacy and is committed to protecting your personal data.

This Privacy and Data Protection Policy will inform you as to how we look after your personal data when you visit our website (regardless of where you visit it from) and tell you about your rights and how the law protects you. Please also use the Glossary to understand the meaning of some of the terms used in this privacy notice.

2. Purpose

This policy aims to give you information on how Books To Africa International (Books2Africa®) collects and processes your personal data through your use of our website or other data collection mechanisms, including any data you may provide through our website or a form when you make a donation, create an account, purchase a product, complete a volunteer or job application form, sign up to our newsletter or take part in any activities or trainings.

Our website is not intended for children and we do not knowingly collect data relating to children.

It is important that you read this policy together with any other privacy notice or terms and conditions we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This policy notice supplements other notices, terms and conditions, and is not intended to override them.

3. Data Controller

Books To Africa International is the controller and responsible for your personal data (collectively referred to as "Books2Africa", "we", "us" or "our" in this policy).

We have appointed a data protection officer (DPO) who is responsible for overseeing questions in relation to this policy. If you have any questions about this policy, please contact our data manager using the details set out below.

4. Contact Details

Chumang Sango
Books2Africa,
Unit 2, Barton Business Park, New Dover Road, Canterbury, CT1 3AA
Telephone: 01227392239
Email: it@books2africa.org

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues (ico.org.uk). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance. It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us by updating your account.

5. Third Party Links and Applications

We may display links on our website to third-party websites to enhance your user experience. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy and data protection statements. When you leave our website, we encourage you to read the privacy notice of

every website you visit. We use tools and applications from organisations such as Wordpress, PayPal, Zapier, Mailchimp and Google to process your data securely.

6. Data We Collect About You

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together follows:

- A. Identity Data includes First name, last name, date of birth and gender.
- B. Contact Data includes; billing address, delivery address, email address and telephone numbers.
- C. Financial Data includes bank account, payment card details and PayPal account details.
- D. Transaction Data includes details about payments to and from you and other details of products and services you have purchased from us.
- E. Technical Data includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, operating system and platform and other technology on the devices you use to access our website.
- F. Profile Data includes your username and password, the organisation(s) you may be affiliated with, donation history, purchases or orders made by you, your interests, preferences, feedback and survey responses.
- G. Usage Data includes information about how you use our website, products and services.
- H. Marketing and Communications Data includes your preferences in receiving marketing from us and our third parties and your communication preferences.

We also collect, use and share Aggregated Data such as statistical or demographic data for any purpose. Aggregated Data may be derived from your personal data but is not considered personal data in law as this data does not directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific service or website feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this policy.

We do not collect any Special Categories of Personal Data about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data). Nor do we collect any information about criminal convictions and offences.

7. If you fail to provide personal data

Where we need to collect personal data by law, or under the terms of a contract we have with you and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to recruit you as a staff or provide you with goods or services). In this case, we may have to cancel a contract, product or service you have with us but we will notify you if this is the case at the time.

8. How we collect personal data

We use different methods to collect data from and about you including through:

- A. Direct interactions: You may give us your Identity, Contact and Financial Data by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:
- i. apply for a vacancy or training course;
 - ii. Make a donation, book a collection or schedule a drop-off;
 - iii. Request a shipment;
 - iv. create an account on our website;
 - v. subscribe to our mailing list;
 - vi. request marketing or notifications via SMS to be sent to you;
 - vii. enter a competition, promotion or survey; or
 - viii. give us some feedback.
- B. Automated technologies or interactions: As you interact with our website, we may automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, server logs and other similar technologies. We may also receive Technical Data about you if you visit other websites employing our cookies. Please see our **cookie policy** for further details.
- C. Third parties or publicly available sources: We may receive personal data about you from various third parties as set out below:
- i. Technical Data from the following parties:
 - a. analytics providers, such as Google (Search) based outside the EU;
 - b. advertising networks such as Google (AdWords) based outside the EU; and
 - c. search information providers such as Google, Bing and Yahoo based outside the EU.
 - ii. Contact, Financial and Transaction Data from providers of technical, payment and delivery services from PayPal Pay based outside the EU.

9. How we use your data

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- A. Where we need to perform the contract we are about to enter into or have entered into with you.
- B. Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- C. Where we need to comply with a legal or regulatory obligation.

Find out more about the types of lawful basis that we will rely on to process your personal data below.

Generally we do not rely on consent as a legal basis for processing your personal data other than in relation to sending third party direct marketing communications to you via email or via SMS text message. You have the right to withdraw consent to marketing at any time by contacting us or updating your communication preferences.

10. Purposes for which we will use your personal data

We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

Purpose/Activity	Type of Data	Lawful basis for processing including basis of legitimate interest
To register you as a new supporter	<ul style="list-style-type: none"> • Identity • Contact 	<ul style="list-style-type: none"> • Performance of a contract with you
To process your order including: donations, booking a collection, scheduling a drop-off, delivering a purchase from our charity shop or requesting a shipment	<ul style="list-style-type: none"> • Identity • Contact • Financial • Transaction • Marketing and Communications 	<ul style="list-style-type: none"> • Performance of a contract with you • Necessary for our legitimate interests - to remain transparent and accountable to supporters
To manage our relationship with you which will include: Keeping you updated on the impact of your support, notifying you about changes to our policies or terms, or asking you to leave a review or take a survey	<ul style="list-style-type: none"> • Identity • Contact • Financial • Transaction • Marketing and Communications 	<ul style="list-style-type: none"> • Performance of a contract with you • Necessary to comply with a legal obligation • Necessary for our legitimate interests (to keep our records updated and to study how supporters use our services and products)
To administer and protect our charity and our website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	<ul style="list-style-type: none"> • Identity • Contact • Technical 	<ul style="list-style-type: none"> • Necessary for our legitimate interests (for running our charity, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise) • Necessary to comply with a legal obligation
To use data analytics to improve our website, products/services, marketing, customer relationships and experiences	<ul style="list-style-type: none"> • Technical • Usage 	<ul style="list-style-type: none"> • Necessary for our legitimate interests (to define types of supporters for our products and services, to keep our website updated and relevant, to develop our charity and to inform our marketing strategy)
To make suggestions and recommendations to you about goods or services that may be of interest to you	<ul style="list-style-type: none"> • Identity • Contact • Technical • Usage • Profile 	<ul style="list-style-type: none"> • Necessary for our legitimate interests (to develop our products/services and grow our charity)

11. Marketing

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising. You can update your preferences on how we contact you by updating your account or clicking the unsubscribe links in the footer of our marketing emails.

We may use your Identity, Contact, Technical, Usage and Profile Data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which products, services and offers may be relevant for you (we call this marketing).

You will receive marketing communications from us if you have requested information from us or purchased [goods or services] from us [or if you provided us with your details when you entered a competition or registered for a promotion] and, in each case, you have not opted out of receiving that marketing.

We will get your express opt-in consent before we share your personal data with any other company for marketing purposes. You can ask us or third parties to stop sending you marketing messages at any time by updating your account or clicking unsubscribe links in the footer of our marketing emails or by contacting us at any time.

12. Cookies

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of our website may become inaccessible or not function properly. Read more information about [how we use cookies](#).

13. Change of purpose

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so. Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

14. Disclosure of your personal data

We may have to share your personal data with the parties set out below for the purposes set out in the table above.

- A. Internal Third Parties as set out in the [Glossary].
- B. Third parties to whom we may choose to sell, transfer, or merge parts of our charity or our assets. Alternatively, we may seek to acquire other charities or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this policy.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

15. Data Security

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

16. Data Retention

By law we have to keep basic information about our supporters (including Contact, Identity, Financial and Transaction Data) for a minimum of 4 years after they cease being supporters for tax purposes.

In some circumstances you can ask us to delete your data: see “Request erasure” below for further information.

In other circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

17. Your Legal Rights

Under certain circumstances, you have rights under data protection laws in relation to your personal data.

- A. Request access to your personal data.
- B. Request correction of your personal data.
- C. Request erasure of your personal data.
- D. Object to processing of your personal data.
- E. Request restriction of processing your personal data.
- F. Request transfer of your personal data.
- G. Right to withdraw consent.

If you wish to exercise any of the rights set out above, please contact us and stop using our website immediately.

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

18. Glossary

A. Lawful Basis

- i. Legitimate Interest means the interest of our charity in conducting and managing our business to enable us to give you the best service/product and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by contacting us.
- ii. Performance of Contract means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.
- iii. Comply with a legal or regulatory obligation means processing your personal data where it is necessary for compliance with a legal or regulatory obligation that we are subject to.

B. Internal Third-Parties

The flow of information within our organisation is managed with the help of secure tools and applications provided by verified third parties including but not limited to; Wordpress, PayPal, Zapier, Mailchimp, Google, Parcelforce, DHL, DPD and others.