

# PRIVACY POLICY

## Who are we?

We're Nadiya, a charity committed to helping displaced Ukrainian citizens obtain visas, find safe accommodation, and comfortably settle in the United Kingdom. While the charity awaits registration with the Charity Commission, Nadiya is operated by RBC Group Limited (Registered company number: 11417547). Nadiya is committed to safeguarding your privacy. This Privacy Policy ("Policy") sets out our data collection and processing practices and your options regarding how your personal information is used.

We may change this Policy from time to time so please check this page occasionally to ensure that you're happy with any changes. By using our website, you're agreeing to be bound by this Policy.

Telling us you are happy to provide your personal data is voluntary. However, without providing us with your personal data, you may be unable to (as appropriate) (a) complete a visa application with our help, (b) get matched with a sponsor in the UK, (c) complete an APHA application with our help, or (d) sign a petition, (e) sign up to be a sponsor, (f) sign a petition, (g) make a donation, (h) or apply to volunteer with us. So we hope you'll trust us to look after it — so we can stay in touch!

## **Our full Privacy Policy is explained below, but the main points to note are:**

- We will only ever ask for what we really need to know.
- We will collect and use the personal data that you share with us transparently, honestly and fairly.
- We will always respect your choices around the data that you share with us and the communication channels that you ask us to use.
- We will put appropriate security measures in place to protect the personal data that you share.
- We will never sell your data.

## **1. How we use the information to help us run the charity effectively:**

We may use your information to:

- submit a visa application to the Home Office;
- submit an application to the Animal Plant and Health Agency for your pet;
- suitably match you with a sponsor in the United Kingdom;
- arrange your travel (including flights and ferries) to the UK;
- arrange the provision of your biometrics in the UK so you may receive your Biometric Residence Permit;
- process a donation that you have made;
- to carry out our obligations arising from any contracts entered into by you and us;

- seek your views or comments on our work;
- notify you of changes to our organisation;
- send you communications which you have requested and that may be of interest to you. (These may include information about community organising, campaigns, fundraising or events.)
- process a grant or job application.
- Make submissions to third parties, where you have signed a petition or letter and the third party is a target of the campaign to which the petition or letter relates.

## **2. What information do we collect?**

The type and amount of information we collect depends on why you are providing it.

We will usually ask you for your name and contact details, including physical address, telephone number, and e-mail address, and personal information, including your date of birth, passport information, and (where appropriate) your birth certificate or other evidentiary proof of your identity.

However, we may request other information where it is appropriate and relevant, for example; if you are a supporter and making a donation. This additional information might include:

(1) Details of why you have decided to contact us, or

- Your bank details and/or your debit/credit card information
- Details of campaigns you have supported or topics/areas of interest to you,
- Responses to surveys you have completed

(2) information about your computer and about your visits to and use of this website including your IP address, geographical location, browser type, referral source, length of visit and number of page views;

(3) information about the services you use, services and products of interest to you or any marketing and/or communication preferences you give; and/or

(4) any other information shared with us in relation to the different purposes set out at clause 1.

### **Do we process sensitive personal information?**

Applicable law recognises certain categories of personal information as sensitive and therefore requiring more protection, including health information, ethnicity and political opinions. In limited cases, we may collect sensitive personal data about you.

We would only collect sensitive personal data if there is a clear reason for doing so; and will only do so with your explicit consent.

### **3. Communications, fundraising and marketing**

Where you have provided us with your physical address, we may contact you by post; and where you have provided appropriate consent, also by telephone and e-mail, with targeted communications to let you know about our events and/or activities that we consider may be of particular interest; about the work of Citizens UK; and to ask for donations or other support.

### **4. Donations and third-party payments**

We may pass your information to our third-party service providers, agents subcontractors and other associated organisations for the purposes of completing tasks and providing services to you on our behalf (for example to process donations or send you mailings).

These third parties have access to your Personal Information only to perform these specific tasks on our behalf and are obligated not to disclose or use it for any other purpose.

### **5. Children's data**

We do not knowingly process data of any person under the age of 16. If we come to discover, or have reason to believe, that you are 15 and under and we are holding your personal information, we will delete that information within a reasonable period and withhold our services accordingly.

### **6. Other disclosures**

We will disclose your Personal Information where required to do so by law or in accordance with an order of a court of competent jurisdiction, or if we believe that such action is necessary to comply with the law and the reasonable requests of law enforcement or to protect the security or integrity of our Service.

### **International Transfer**

Your information, including Personal Information, may be transferred to — and maintained on — computers located outside of your state, province, country or other governmental jurisdiction where the data protection laws may differ than those from your jurisdiction. This is because we work with trusted suppliers, for example our website provider, who are a US company.

If you are located outside United Kingdom and choose to provide information to us, please note that we transfer the information, including Personal Information, to United Kingdom and process it there.

Your consent to this Privacy Policy followed by your submission of such information represents your agreement to that transfer.

In the event that a dispute arises with regards to the international transfer of data, you agree that the courts of England and Wales shall have exclusive jurisdiction over the matter.

## **7. Security of and access to your personal data**

We endeavour to ensure that there are appropriate and proportionate technical and organisational measures to prevent the loss, destruction, misuse, alteration, unauthorised disclosure or of access to your personal information.

Your information is only accessible by appropriately trained staff, volunteers and contractors.

The security of your Personal Information is important to us but remember that no method of transmission over the internet, or method of electronic storage is 100% secure. While we strive to use commercially acceptable means to protect your Personal Information, we cannot guarantee its absolute security. As such we make no warranties as to the level of security afforded to your data, except that we will always act in accordance with the relevant UK and EU legislation.

Otherwise than as set out in this Privacy Policy, we will only ever share your data with your informed consent.

## **8. Your rights and how consent works**

You have a choice about whether or not you wish to receive information from us. If you do not want to receive communications from us about the vital work we do and our exciting products and services, then you can select your choices by ticking the relevant boxes situated on the form on which we collect your information.

Where we rely on your consent to use your personal information, you have the right to withdraw that consent at any time. This includes the right to ask us to stop using your personal information for direct marketing purposes or to be unsubscribed from our email list at any time. You also have the following rights:

(1) Right to be informed – you have the right to be told how your personal information will be used. This Policy and other policies and statements used on our website and in our communications are intended to provide you with a clear and transparent description of how your personal information may be used.

(2) Right of access – you can write to us to ask for confirmation of what information we hold on you and to request a copy of that information. Provided we are satisfied

that you are entitled to see the information requested and we have successfully confirmed your identity, we have have 30 days to comply (as of 25 May 2018).

(3) Right of erasure – as from 25 May 2018, you can ask us for your personal information to be deleted from our records. In many cases we would propose to suppress further communications with you, rather than delete it.

(4) Right of rectification – if you believe our records of your personal information are inaccurate, you have the right to ask for those records to be updated.

(5) Right to restrict processing – you have the right to ask for processing of your personal data to be restricted if there is disagreement about its accuracy or legitimate usage.

(6) Right to data portability – to the extent required by the General Data Protection Regulations (“GDPR”) where we are processing your personal information (i) under your consent, (ii) because such processing is necessary for the performance of a contract to which you are party or to take steps at your request prior to entering into a contact or (iii) by automated means, you may ask us to provide it to you – or another service provider – in a machine-readable format.

To exercise these rights, please send a description of the personal information in question using the contact details in section 16 below. We also have specific pages to unsubscribe from our email list.

Where we consider that the information with which you have provided us does not enable us to identify the personal information in question, we may ask you for (i) personal identification and/or (ii) further information.

Please note that some of these rights only apply in limited circumstances. For more information, we suggest that you consult [ICO guidance](#).

You are further entitled to make a complaint about us or the way we have processed your data to the Information Commissioner’s Office (“ICO”). For further information on how to exercise this right, [please see this guidance](#) and [ICO's contact details](#). The contact details of the ICO can be found here.

## **9. Lawful processing**

We are required to have one or more lawful grounds to process your personal information. Only 4 of these are relevant to us:

### **(1) Consent**

We will ask for your consent to use your information to send you electronic communications such as newsletters and marketing and fundraising emails, for targeted advertising, and if you ever share sensitive personal information with us.

## (2) Contractual relationships

Most of our interactions with subscribers and website users are voluntary and not contractual. However, sometimes it will be necessary to process personal information so that we can enter contractual relationships with people. For example, if you apply for employment or to volunteer with us.

## (3) Legal obligations

Sometimes we will be obliged to process your personal information due to legal obligations which are binding on us. We will only ever do so when strictly necessary.

## (4) Legitimate interests

Applicable law allows personal information to be collected and used if it is reasonably necessary for our legitimate activities (as long as its use is fair, balanced and does not unduly impact individuals' rights).

We will rely on this ground to process your personal data when it is not practical or appropriate to ask for consent.

When we use your personal information, we will consider if it is fair and balanced to do so and if it is within your reasonable expectations. We will balance your rights and our legitimate interests to ensure that we use your personal information in ways that are not unduly intrusive or unfair in other ways.

## **10. Data retention**

In general, unless still required in connection with the purpose(s) for which it was collected and/or is processed, we remove your personal information from our records five years after the date it was collected. However, if before that date (i) your personal information is no longer required in connection with such purpose(s), (ii) we are no longer lawfully entitled to process it or (iii) you ask us to delete it we will remove it from our records at the relevant time.

In the event that you ask us to stop sending you direct marketing/fundraising/other electronic communications, we will keep your name on our internal suppression list to ensure that you are not contacted again.

We review our retention periods for personal information on a regular basis (see item 12 of this Privacy Statement). We are legally required to hold some types of information to fulfil our statutory obligations (for example the collection of Gift Aid). You can request to remove your personal information at any time by emailing [info@rbcgroup.co.uk](mailto:info@rbcgroup.co.uk) or you can make a subject access request to see what data we hold on you.

## **11. Policy amendments**

We keep this Privacy Policy under regular review and reserve the right to update

from time-to-time by posting an updated version on our website, not least because of changes in applicable law. We recommend that you check this Privacy Policy occasionally to ensure you remain happy with it. We may also notify you of changes to our privacy policy by email.

## **12. Third party websites**

We link our website directly to other sites. This Privacy Policy does not cover external websites and we are not responsible for the privacy practices or content of those sites. We encourage you to read the privacy policies of any external websites you visit via links on our website.

## **13. Updating information**

You can check the personal data we hold about you, and ask us to update it where necessary, by emailing us at [info@rbcgroup.co.uk](mailto:info@rbcgroup.co.uk).

## **14. Cookies Policy**

Our website contains cookies, in line with most websites, in order for us to better understand what content supporters like and don't like and improve our promotional material.

- A cookie is a small file placed on the hard drive of your computer or mobile device. It may contain certain data, including, but not limited to: the name of the server that has placed it there, an identifier in the form of a unique number, and, an expiration date (some cookies only). Cookies are managed by the web browser on your computer (Internet Explorer, Firefox, Safari or Google Chrome).
- Different types of cookies which have different purposes are used on our website.

### *Essential Cookies*

- These cookies are essential to allow you to browse our website and use its functions. Without them, services such as shopping baskets and electronic invoicing would not be able to work.

### *Performance Cookies*

- These cookies collect information on the use of our website, such as which pages are consulted most often. This information enable us to optimise our website and simplify browsing. These cookies do not collect any information which could be used to identify you. All the information collected is aggregated, and therefore anonymous.

### *Functionality Cookies*

- These cookies enable our website to remember the choices you have made when browsing. For example, we can store your geographical location in a cookie so that the website corresponding to your area is shown. We can also remember your preferences, such as the text size, font and other customizable aspects of the website. Functionality cookies may also be able to keep track of the products or videos consulted to avoid repetition. The information collected by these cookies cannot be used to identify you and cannot monitor your browsing activity on sites which do not belong to us.
- It is possible that you will come across third-party cookies on some pages of sites that are not under our control.
- You may refuse to accept browser cookies by activating the appropriate setting in your browser. However, if you select this setting you may be unable to access certain parts of our Website. Unless you have adjusted your browser setting so that it will refuse cookies, our system will issue cookies when you direct your browser to our Website.

## **16. Contact**

Please let us know if you have any queries or concerns whatsoever about the way in which your data is being processed by either emailing the Data Protection Officer at [info@rbcgroup.co.uk](mailto:info@rbcgroup.co.uk) or by writing to us at the following address:

Data Protection Officer  
Attn: Nadiya  
RBC Group  
Unit 3, Old Dalby Trading Estate  
Old Dalby  
Leicestershire  
LE14 3NJ