Data Protection Policy

Introduction

In order to operate, Xavier Project needs to gather, store and use certain forms of information about individuals.

These can include children, students, employees, contractors, suppliers, volunteers, beneficiaries (refugee children/parents) and potential scholarship awards, business contacts and other people the organisation has a relationship with or regularly needs to contact.

This policy explains how this data should be collected, stored and used in order to meet Xavier Project's data protection standards and comply with the law.

Why is this policy important?

This policy ensures that Xavier Project:

- Protects the rights of the children, students, volunteers and supporters
- Complies with data protection law and follows good practice
- Protect the organisation from the risks of a data breach

Roles and responsibilities

Who and what does this policy apply to?

This applies to all those handling data on behalf of Xavier Project, e.g.:

- Employees and volunteers
- Contractors/3rd-party suppliers

It applies to all data that the organisation holds relating to individuals, including:

- Names
- Email addresses
- Postal addresses
- Physical home address
- Nationality
- Religion
- Phone numbers
- Any other personal information held (e.g. financial)

<u>Roles and responsibilities</u>

Everyone who has access to data as part of Xavier Project has a responsibility to ensure that they adhere to this policy.

Data controller

The Data Controller for Xavier Project is Edmund Lang'at – Chief Operation's Officer. He, together with the CEO and leadership team, are responsible for why data is collected and how it will be used. Any questions relating to the collection or use of data should be directed to the Data Controller.

<u>Data protection and principles</u>

We fairly and lawfully process personal data

Xavier Project will only collect data where lawful and where it is necessary for the legitimate purposes of the organisation.

A staff member's bio-data will be collected when they first join the organisation, and will be used to contact the member regarding organisation administration and activities. Other data may also subsequently be collected in relation to their NSSF membership, including on their payment history for 'subs'.

The name and contact details of beneficiaries (refugees children/parents), volunteers, employees and contractors will be collected when they take up a position, awarded scholarships, and will be used to contact them regarding organisation administration related to their role.

Further information, including personal financial information and criminal records information may also be collected in specific circumstances where lawful and necessary.

An individual's name and contact details will be collected when they make a booking for an event. This will be used to contact them about their booking and to allow them entry to the event.
An individual's name, contact details and other details may be collected at any time (including when booking tickets or at an event), with their consent, in order for the organisation to communicate with them about organisation activities, and/or for Direct Marketing. See 'Direct Marketing' below.

We only collect and use personal data for specified and lawful purposes.

When collecting data, Xavier Project will always explain to the subject why the data is required and what it will be used for, e.g.

"*Please enter your email address in the form below. We need this so that we can send you email updates for organisation activities.*"

We will never use data for any purpose other than that stated or that can be considered reasonably to be related to it. For example, we will never pass on personal data to 3rd parties without the explicit consent of the subject.

We ensure any data collected is relevant and not excessive

Xavier Project will not collect or store more data that the minimum information required for its intended purpose.

E.g. we need to collect telephone numbers from parents in order to be able to contact them about organisation scholarship opportunities or needs, but data on their sexuality will not be collected, since it is unnecessary and excessive for the purposes of organisation administration.

We ensure data is accurate and up-to-date

Xavier Project will ask staff members, volunteers and beneficiaries (refugee children/parents) to check and update their data on an annual basis.

Any individual will be able to update their data at any point by contacting the Data Controller or any other appointed officer.

We ensure data is not kept longer than necessary

Xavier Project will keep data on individuals for no longer than 60 months after our involvement with the individual has stopped, unless there is a legal requirement to keep records.

We process data in accordance with individuals' rights

The following requests can be made in writing to the Data Controller:

- Staff members, beneficiaries (refugee children/parents), volunteers and supporters can request to see any data stored on about them. Any such request will be actioned within 14 days of the request being made.

- Staff members, beneficiaries (refugee children/parents) and supporters can request that any inaccurate data held on them is updated. Any such request will be actioned within 14 days of the request being made.

- Staff members, beneficiaries (refugee children/parents) and supporters can request to stop receiving any marketing communications. Any such request will be actioned within 14 days of the request being made.

Staff members, beneficiaries (refugee children/parents) and supporters can object to any storage or use of their data that might cause them substantial distress of damage or any automated decisions made based on their data. Any such objection will be considered by the CEO and leadership team, and a decision communicated within [30] days of the request being made.

We keep personal data secure

Xavier Project will ensure that data held by us is kept secure.

Electronically-held data will be held within a password-protected and secure environment

Passwords for electronic data files will be re-set each time an individual with data access leaves their role/position

Physically-held data (e.g. staff files or email sign-up sheets) will be stored on a locked cupboard

Keys for locks securing physical data files should be collected by the Data Controller from any individual with access if they leave their role/position. The codes on combination locks should be changed each time an individual with data access leaves their role/position

Access to data will only be given to relevant leadership team where it is clearly necessary for the running of the organisation. The Data Controller will decide in what situations this is applicable and will keep a master list of who has access to data

Transfer to other organisation/countries.

Xavier Project will not transfer data to other organisations/countries unless the organisation/country has adequate protection for the individual.

Organisations to organisations/individuals

We only share beneficiaries (refugee children/parents) data with other organisations or individuals with the subject's prior consent

As an organisation, Xavier Project encourages communication between organisations.

To facilitate this:

> *Other organisations can request the personal contact data of beneficiaries (refugee children/parents) or students/parents in writing via the Data controller. These details will be given, as long as they are for the purposes of contacting the subject (e.g. an email address, not financial or health data) and the subject consents to their data being shared with other organisations in this way*

Direct Marketing

Xavier Project will regularly collect data from consenting supporters for marketing purposes. This includes contacting them to promote concerts, updating them about organisation news, fundraising and other organisation activities.

Any time data is collected for this purpose, we will provide:

A clear and specific explanation of what the data will be used for (e.g. 'Tick this box if you would like Xavier Project to send you email updates with details about our forthcoming events, fundraising activities and opportunities to get involved')

A method for users to show their active consent to receive these communications (e.g. a 'tick box')

Data collected will only ever be used in the way described and consented to (e.g. we will not use email data in order to market 3rd-party products unless this has been explicitly consented to).

Every marketing communication will contain a method through which a recipient can withdraw their consent (e.g. an 'unsubscribe' link in an email). Opt-out requests such as this will be processed within 14 days.

Cookies on the Xavier Project website

A cookie is a small text file that is downloaded onto 'terminal equipment' (e.g. a computer or smartphone) when the user accesses a website. It allows the website to recognise that user's device and store some information about the user's preferences or past actions.

Xavier Project uses cookies on our website www.xavierproject.org in order to monitor and record their activity. This allows us to improve users' experience of our website by, for example, allowing for a 'logged in' state, and by giving us useful insight into how users as a whole are engaging with the website.

We will implement a pop-up box on www.xavierproject.org that will activate each new time a user visits the website. This will allow them to click to consent (or not) to continuing with cookies enabled, or to ignore the message and continue browsing (i.e. give their implied consent).

It will also include a link to our Privacy Policy which outlines which specific cookies are used and how cookies can be disabled in the most common browsers.

Policy prepared by: Edmund Lang'at

Approved by Board/committee on: [enter date of approval]

Next review date: [enter review date]