

Oxfam Ireland Full Privacy Policy

Version 1.1 Updated on: 09/12/2019 Author: Colin Carey

Privacy and cookies on Oxfam Ireland's website

Oxfam Ireland Privacy Policy

Introduction and general terms

Oxfam Ireland promises to take great care with your personal data, and we commit to protecting any personal information we obtain about you, whether you are a financial supporter, shopper, volunteer, employee/applicant or campaigner.

This Privacy Policy sets out how and why we obtain, use and protect personal information if you interact with us in one of the above roles.

In the event that you work with us in another way - for instance, enrol in a specific event, program, apply for a job, or are a member of staff, there may be a separate Privacy Policy which describes how we use that data.

It is important that you read this privacy notice together with any other privacy notice or fair processing notice 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 privacy notice supplements the other notices and is not intended to override them.

Who we are

Oxfam Ireland is a registered charity in Ireland and Northern Ireland, with headquarters based in Dublin, Portview House, Thorncastle Street, Ringsend, Dublin 4, Ireland and Belfast, 115 North Street, Belfast BT1 1ND, UK

ROI Charity Number: CHY 5988

NI Charity Number CHYXN 89651

ROI Company Number 284292

NI Company Number 33800

Charities Regulatory Authority in Ireland Registered Charity Number: 20009946 Charity Commission NI Registered Charity Number: NIC100848

Oxfam Ireland is a member of the international confederation Oxfam.

This Privacy Policy applies to all the above entities.

Oxfam Ireland is the controller and responsible for your personal data (collectively referred to as "Oxfam Ireland", "we", "us" or "our" in this privacy notice).

Oxfam Ireland's purpose

Oxfam Ireland's purpose and overall mission is to end the injustice of poverty. We provide humanitarian aid in times of crisis, fund long term community development programmes and conduct research and campaign for long term solutions to poverty.

Our supporters help us to achieve this in a variety of ways, primarily by:

- Fundraising, donating money and donating or purchasing goods for sale in Oxfam shops in order to support our programme of work
- Campaigning for change, through signing petitions, writing letters and taking part in other campaigning actions
- Volunteering, including in Oxfam shops, at events and in our offices

We take active steps to make sure that our supporters are aware of the ways in which they can help us achieve our overall purpose.

Why we hold and process supporters' personal data

We hold and process supporters' personal data for a number of reasons:

- To keep a record of donations made and actions taken by our supporters and our communications with them
- To send our supporters marketing information about our projects, fundraising activities and appeals where we have their consent or are otherwise allowed to
- To support volunteers, whether in shops, at festivals or participating in fundraising events
- To record campaigning actions by supporters
- To support community-based fundraising and campaigning
- To claim tax relief income through the Charitable Donation Scheme (ROI) and Gift Aid (NI) on donations
- To fulfil contractual and transactional obligations entered into with supporters e.g. online purchases
- To keep people safe, whether they are visitors to our shops, staff or participants in events
- To comply with legal obligations
- To manage our organisation
- To ensure we do not send unwanted information to supporters or members of the public who have informed us they do not wish to be contacted

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.

These reasons are underpinned by a "legal basis" under GDPR*. We outline in the next section what these are for our main activities.

*The General Data Protection Regulation 2016/679 is a regulation in EU law on data protection and privacy for all individual citizens of the European Union and the European EconomOPTic Area. It also addresses the transfer of personal data outside the EU and EEA areas

Applying for a job with Oxfam Ireland

When you apply for a job with us (whether you are an internal candidate or not), you will be asked to provide personal information to support your application and to enable us to determine your eligibility and suitability to work with Oxfam Ireland This will include the personal information we need to enable us to select the right candidate for the role, and may include things such as past employment details, educational qualifications, skills, and volunteering activities.

If you are successful in the employment process any personal information provided to us may then form part of your HR record which we would hold.

Pre-employment checks:

All offers of employment will be subject to pre employment checks including satisfactory references, medical questionnaire and appropriate screening checks, which can include criminal records and terrorism finance checks. Oxfam Ireland also participates in the <u>Inter-Agency Misconduct Disclosure Scheme</u>.

Diversity information:

In accordance with Fair Employment Regulations (NI only), you will be asked to complete a monitoring form. This will include declaring information about your ethnicity, disability, age, religion/belief, gender and sexual orientation. This information is used assist us in completing annual FEC returns and access to this information is strictly limited.

Explaining the legal bases we rely on

The law on data protection sets out a number of different reasons for organisations to collect and process your personal data: When collecting your personal data, we will always make clear to you which data is necessary for a particular purpose.

Oxfam Ireland relies on the following legal bases in our marketing activities Consent

Wherever possible, we will ask for your consent to send you marketing information. We will do this through a clear statement of non-channel specific consent.

For example, if you donate online to one of our emergency appeals, you will be asked whether you would like us to keep in touch from time to time about our projects, fundraising activities and appeals. This consent is considered applicable across all channels – Phone, Email, Post and SMS.

Legitimate interest

In specific situations, we process your data to pursue our legitimate interests in ways which might reasonably be expected, and which do not materially impact your rights, freedom or interests. Oxfam Ireland's use of legitimate interest includes the following:

Sending direct marketing information by post, to keep our supporters updated on our projects, fundraising activities and appeals. We will only do this where we have reason to believe that this information will be of interest.

We make it easy for you to opt out by;

- Calling us on +353 (0) 1 672 7662 (ROI) or +44 (0) 28 9023 0220 (NI)
- Emailing us on: <u>IRL-DataProtectionOfficer@oxfam.org</u>
- Selecting to opt out via tick box on the printed material and returning by Freepost.

Where you have bought items from the Oxfam Online Shop, we will email you to tell you about other relevant offers. All such emails will include a simple opt out mechanism.

We may use your details to identify you to deliver targeted ads using Adroll, Facebook , LinkedIn, or other social media sites in order to serve you Oxfam Ireland's content.

We may analyse your previous support of Oxfam Ireland in order to offer relevant ways of supporting Oxfam Ireland in the future.

To help identify businesses who may wish to support Oxfam Ireland, we send emails to individuals where relevant to their job, for instance people working in Corporate Social Responsibility.

For activities other than marketing, we may rely on different legal bases:

Legal compliance

If the law requires us to, we may need to collect and process your data.

For example, where you sign up to the Gift Aid scheme (NI) or the Charity Tax Back Scheme (ROI) we will process your data for the purposes of submitting a claim to HMRC or Revenue.

Consent

We may ask for your consent for data - for instance where you campaign with us or engage with a program in Republic of Ireland/Northern Ireland and can give you a clear choice about what information you need to provide.

Legitimate Interest

In many situations we need data in order to carry out a task, such as enrol you on a program, run an event, administer our organisation, plan or run campaigning activities etc.

Public Interest

In limited situations we may use data in the public interest. It is likely to be in the public interest to collect data to prevent crime or dishonesty, ensure that we are fair in our practices by carrying out equality and diversity monitoring, or safeguard the wellbeing of people with whom we work.

When and why we will send you personalised marketing communications

Oxfam Ireland will only contact you for marketing purposes - for example keep you up to date on our work, or let you know of ways in which you can support that work - where we have your consent or we are otherwise allowed to do so.

We will make it easy for you to tell us if you would like to receive marketing communications from us and hear more about our work and the ways in which you would like to receive this information (post, email, SMS and phone). We will not send you marketing material if you tell us that you do not wish to receive it.

We will generally treat any marketing consent you give us as lasting indefinitely although we will provide you with regular opportunities to shape and control your communication from Oxfam Ireland. This is to enable us to keep you up to date with the impact of your support, and to ask whether alternative means of support would be of interest.

Other circumstances in which you may receive marketing information from Oxfam Ireland

"Legitimate Interest"

We may send you marketing communications by direct mail where you are a regular supporter and we have evidence that you do not object to receiving marketing material through the post.

We will not use "legitimate interest" if you have opted out of direct mail whether direct to Oxfam Ireland or by registering with the Mailing Preference Service (MPS) or the Fundraising Preference Service (FPS).

"Soft opt-in"

This allows organisations to send marketing communications by email and SMS to individuals who have previously purchased similar goods and services, provided they were given the opportunity to opt-out at the time of purchases.

How and when we collect information about you

Oxfam Ireland may collect your personal data in the following circumstances:

When you give it to us DIRECTLY

You may give us your personal data directly when you make a donation, sign up for one of our events, take part in a campaigning action, volunteer at one of our shops, purchase products from the Oxfam Online Shop or when you communicate with us.

When you give it to us INDIRECTLY

You may give us your information indirectly when you sign up to events such as the Dublin Marathon, contribute to Oxfam Ireland via fundraising sites like JustGiving or Everyday Hero, or participate in a campaigning action with a partner. These independent third parties will pass your data to Oxfam Ireland where you have indicated that you wish to support Oxfam Ireland and have given your consent, or it is a necessary part of completing a contract with you.

Sometimes your personal data is collected by an organisation working on our behalf (for example a professional fundraising agency) but as they are acting on our behalf, we are the "data controller" and responsible for the security and proper processing of that data.

When you access Oxfam Ireland's Social Media

We might also obtain your personal data through your use of social media such as Facebook, WhatsApp, Twitter or LinkedIn, depending on your settings or the privacy policies of these social media and messaging services. To change your settings on these services, please refer to their privacy notices, which will tell you how to do this.

https://www.facebook.com/policy.php https://twitter.com/en/privacy https://www.whatsapp.com/legal/#privacy-policy https://www.linkedin.com/legal/privacy-policy

When the information is publicly available

We might also obtain personal data about individuals who may be interested in giving major gifts to charities or organisations like Oxfam Ireland. In this scenario, Oxfam Ireland may seek to find out more about these individuals, their interests and motivations for giving through publicly available information. This information may include newspaper or other media coverage, open postings on social media sites such as LinkedIn, and data from Companies House / Department of enterprise, trade and employment.

We may also gather information if your activities relate to our work - for instance, if you are a public figure such as a Member of Parliament or Teachta Dála (TD) or you represent an organisation which we work with or which is related to one of our campaigns, we may gather information about you in order to inform our campaigning and make decisions - for instance, whether we engage with you to seek your support for our work, ask your constituents to write to you, or choose to work with you in another way.

When we use cookies

Cookies are a useful way for us to understand how supporters use our website and other platforms.

When you visit an Oxfam Ireland controlled web site, we will collect data from your computer or other device such as a smart phone or tablet through the use of "cookies". Cookies are created by your web browser when you visit our website. Every time you go back to the Oxfam Ireland website, your browser will send the cookie file back to the website's server. They improve your experience of using our website, for example, by remembering your preference settings so that you are presented with information likely to be most relevant to you, and by measuring your use of the website to enable us to continuously improve our website to ensure that it meets your needs. Cookies can also be used to show you relevant Oxfam Ireland content on social media services such as Facebook - these are known as "retargeting" or "advertising" cookies.

For information on the types of cookies we use, how we use them and how you can control your cookie preferences, see Oxfam Ireland's cookie policy.

If you visit our website as an anonymous visitor (e.g. you switch off cookies), Oxfam Ireland may still collect certain information from your browser, such as the IP address (an IP address is a number that can uniquely identify a computer or other internet device).

The Oxfam Ireland websites contains hyperlinks to websites owned and operated by other organisations. These include other media organisations (such as RTE), research organisations and think tanks (such as the Overseas Development Institute), our festival partners (such as Electric Picnic), other related charities (such as Trocaire and Concern), and Oxfam affiliates in other countries.

These third-party websites have their own privacy policies, including policies on their use of cookies, and we urge you to review them. They will govern the use of personal information

you submit or which is collected by cookies whilst visiting these websites. We cannot accept any responsibility or liability for the privacy practices of such third-party websites and your use of such websites is at your own risk.

What information might Oxfam Ireland collect about you?

We only collect personal data relevant to the type of transactions or interaction you have with Oxfam Ireland.

Whatever your interaction with us this information will be minimal and linked to the purpose for which we need it.

For example, when you contact Oxfam Ireland to make a donation, purchase an item online, take a campaign action, sign up to any of Oxfam Ireland's activities or online content (such as newsletters, competitions, or message boards) or you telephone, email, write to or text Oxfam Ireland, or engage with Oxfam Ireland via social media channels, we may receive and retain personal information.

Technical Data includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access this website.

In these cases, we are likely to process details such as your name, email address, postal address, telephone or mobile number, bank account details to process donations and whether or not you are a tax payer so that we can claim a tax benefit from your gift.

If you visit one of our shops or sites, we may capture you on CCTV, or you may give information to our staff via a feedback process.

If you participate in an event we may (with your permission) take your photograph or video or interview you.

If you participate in market research, we may ask you questions regarding your experience with us, or other survey questions relating to your experience.

If you are a campaigner or work with our campaigns team, we may collect information such as correspondence with you regarding campaigning, details of your background and activities with us or relating to the issue, the events you attend, or how we would like to work with you.

Where we gather information about you which is publicly available - for instance as a major donor or your views on our campaigning activity - this may include your name, contact details, views and positions you have expressed, and details regarding your circumstances-for instance which political roles you hold or what your background is.

Sensitive Personal Data

We only collect "sensitive personal data" about our supporters, e.g. health status, where there is a clear and specific reason for doing so, such as participation in a marathon or volunteering at a music event or an Oxfam shop.

We collect this data where we need it to ensure that we provide appropriate facilities or support to enable you to participate in the event or carry out your role. Clear notices will be provided on application forms so that it is clear what information we need and why we need it. In certain circumstances, such as when we recruit volunteer festival stewards, we need to obtain information about criminal convictions (where these are unspent) in order to check that it is appropriate for you to undertake the role. Where a conviction is declared our Criminal Conviction Policy will be applied.

If you apply for a role with us, we may collect this data for equality monitoring (NI only).

Rarely, we may collect this data for the prevention of crime or dishonesty, to safeguard those with whom we work, or for another reason which is in the public interest. Where we do this, we will do it carefully and in accordance with applicable laws.

Should you support Oxfam Ireland in a substantial way, we may provide an account manager to help you tailor your relationship to suit your interests. If this is the case, we may collect sensitive personal data where relevant to our relationship, such as your political or religious views. Should you disclose information to us about your health or your family, this may also be recorded, so that we can communicate with you in a considerate and appropriate manner.

All sensitive personal data is stored on a secure database, to which only a limited number of relevant staff have access. It is deleted when no longer relevant, is never shared with third parties, and is available to you at any point should you wish to see it.

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 or genetic and biometric data)

How will Oxfam Ireland use your personal data?

Oxfam Ireland will use your personal information for the following purposes:

For administrative reasons, including:

• "Service administration", which means that Oxfam Ireland may contact you for reasons related to administering any donations you have made, your tax status, the completion of commercial or other transactions you have entered into with Oxfam Ireland or the activity or online content you have signed up for

- To confirm receipt of donations and to say thank you and provide details of how your donation might be used. for example, if you donate via online channels you will receive a "Thank you" email message
- In relation to correspondence you have entered into with us whether by letter, email, text, social media, message board or any other means, and to contact you about any content you provide;
- For internal record keeping so as to keep a record of your relationship with us;
- To fulfil sales contracts, you have entered into with Oxfam Ireland.
- To provide logistical and fundraising information to people who are taking part in a fundraising event in aid of Oxfam Ireland, such as the Oxfam Trailwalker event, or the Dublin City Marathon
- To communicate with Oxfam volunteers to support you in your designated role or administer that role and our organisation
- To keep your data up to date
- To implement any instructions, you give us to with regard to withdrawing consent to send marketing information or informing us that you do not wish to receive any marketing information
- To use IP addresses to identify the location of users, to block disruptive use and to establish the number of visits from different countries
- To protect our staff and those with whom we work, or to prevent crime and dishonesty.
- For marketing and fundraising reasons
- For market research
- to invite you to participate in surveys or research about Oxfam or our work (participation is always voluntary)
- To analyse and improve the activities and content offered by the Oxfam Ireland website to provide you with the most user-friendly navigation experience. We may also use and disclose information in aggregate (so that no individuals are identified) for marketing and strategic development purposes

Will Oxfam Ireland share your personal information with anyone else?

We will only use your information within Oxfam Ireland for the purposes for which it was obtained. Oxfam Ireland will not, under any circumstances, share or sell your personal data with any third party for their own marketing purposes, and you will not receive marketing from any other companies, charities or other organisations as a result of giving your details to us.

Oxfam's suppliers

We may need to share your information with service providers who help us to deliver our projects, fundraising activities and appeals, for instance through handling responses to our emergency appeals. These "data processors" will only act under our instruction and are subject to pre-contract scrutiny and contractual obligations containing strict data protection clauses. We do not allow these organisations to use your data for their own purposes or disclose it to other third parties without our consent and we will take all reasonable care to ensure that they keep your data secure.

Digital Marketing on display, Facebook and other social media sites

We may also use your email address and/or phone number to match to your account for display advertising and Facebook or other social media sites in order to show you Oxfam Ireland content while using these services. We only do this where you have opted into marketing emails or phone calls and we keep your data secure by encrypting it. No data we hold about you is retained by the third party.

In addition, we may also use your email address and phone number to link to Facebook or other social media sites in order to identify other users of these sites whom we believe would be interested in Oxfam Ireland, and we may then show them Oxfam content. No data we hold about you is retained by the third party.

There are two ways to prevent this use of your data, you can either update your preferences at Oxfam Ireland by opting out of the relevant channel of communication or you can do this via the social media site:

Facebook: https://www.facebook.com/help/568137493302217 LinkedIn: https://www.linkedin.com/help/linkedin/answer/62931 Twitter: https://business.twitter.com/en/help/troubleshooting/how-twitter-ads-work.html Adroll: https://d.adroll.com/consent/choices

Updating your preferences with Oxfam Ireland will not guarantee that you never see Oxfam Ireland content on social media, since the social media site may select you based on other criteria and without your data having been provided by Oxfam.

Third-party links

Our website may include links to third-party websites, plug-ins and applications. 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 statements. When you leave our website, we encourage you to read the privacy notice of every website you visit.

Current and former Oxfam employees

When you leave Oxfam Ireland, Oxfam may process your data to respond to requests for employment references. In addition, Oxfam Ireland participates in the Inter-Agency Scheme

for the Disclosure of Safeguarding-related Misconduct in Recruitment Process within the Humanitarian and Development Sector ('Scheme'). Where you apply for employment with another member of the Scheme, they will request a statement from Oxfam Ireland disclosing whether you have been found to have committed misconduct (in the form of sexual exploitation, sexual abuse or sexual harassment) while employed at Oxfam. Oxfam will respond to these requests in line with the rules of the Scheme.

More details about the Scheme are available on the Steering Committee for Humanitarian Response website.

Find out more about Oxfam's assessment of the privacy impacts of participation in the Scheme.

Where legally required

We will also comply with legal requests where disclosure is required or permitted by law (for example to government bodies, statutory bodies, or law enforcement agencies for tax purposes, where it is in the public interest, or the prevention and detection of crime, subject to appropriate protection in law).

Oxfam may transfer your personal data outside the EEA. If it does so, this may occur under the protections of the European Commission's standard contractual clauses but will otherwise only take place where appropriate standards and safeguards are in place.

International Transfers

We may share your personal data with Oxfam International. This may will involve transferring your data outside the European Economic Area (EEA).

We ensure your personal data is protected by requiring all affiliates to follow the same rules when processing your personal data. These rules are called "binding corporate rules". For further details, see European Commission: Binding corporate rules.

Whenever we transfer your personal data out of the EEA, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data by the European Commission. For further details, see European Commission: Adequacy of the protection of personal data in non-EU countries. link

Where we use certain service providers, we may use specific contracts approved by the European Commission which give personal data the same protection it has in Europe. For further details, see European Commission: Model contracts for the transfer of personal data to third countries. link

Where we use providers based in the US, we may transfer data to them if they are part of the Privacy Shield which requires them to provide similar protection to personal data shared

between the Europe and the US. For further details, see European Commission: EU-US Privacy Shield. link

Please contact us on <u>IRL-DataProtectionOfficer@oxfam.org</u> if you want further information on the specific mechanism used by us when transferring your personal data out of the EEA.

How long will Oxfam Ireland keep your personal information?

We will hold your personal information on our systems for as long as is necessary for the relevant activity, for example we will keep a record of donations subject to gift aid for at least seven years to comply with HMRC rules.

If you request that we stop sending you marketing materials, we will keep a record of your contact details and appropriate information to enable us to comply with your request not to be contacted by us.

Legacy income is vital to the running of the charity. We may keep data you provide to us indefinitely, to carry out legacy administration and communicate effectively with the families of people leaving us legacies. This also enables us to identify and analyse the source of legacy income we receive.

Where you contribute material to us, e.g. user generated content or in response to a particular campaign, we will only keep your content for as long as is reasonably required for the purpose(s) for which it was submitted unless otherwise stated at the point of generation.

How to control what we send you or request we update your personal information?

The accuracy of your information is really important to us. We want to ensure that we are able to communicate with you in ways that you are happy with, and to provide you with information that is of interest.

If you wish to change how we communicate with you, or update the information we hold, then please contact us.

write to us at:

Oxfam Ireland, Portview House, Thorncastle Street, Ringsend, FREEPOST F927, Dublin 4,

Or

Freepost RLXK-TUAJ-ZESZ, 115 North Street, Belfast, BT1 1ND

email us at: <u>IRL-DataProtectionOfficer@oxfam.org</u>

call us on +353 (0) 1 672 7662 (ROI) or +44 (0) 28 9023 0220 (NI)

Email - You can opt out of marketing emails at any time by clicking the unsubscribe link in any marketing email from Oxfam Ireland.

How long will it take for these changes to be effective?

We endeavour to meet the following service levels where supporters request, we do not send them marketing information:

Email - 24 hours from receipt of email

Telephone - 24 hours from receipt of request to opt out

Mail - 28 days from receipt of 'do not mail' request. This period is longer than for other channels due to the production times for mailing campaigns, and in most cases we would expect the change to be effective much more quickly.

How Oxfam Ireland keeps your data safe

We ensure that there are appropriate technical controls in place to protect your personal details. For example, our online payments are always encrypted and our network is protected and routinely monitored.

We undertake regular reviews of who has access to information that we hold to ensure that your information is only accessible by appropriately trained staff, volunteers and contractors.

We use external companies to collect or process personal data on our behalf. We do comprehensive checks on these companies before we work with them and put a contract in place that sets out our expectations and requirements, especially regarding how they manage the personal data they collect on our behalf, or have access to. We have a robust partner monitoring framework to ensure these contractual obligations are met.

These organisations - referred to as "Data Processors" also have legal liability for the way in which your data is used, providing you with additional protection.

Your rights over your personal data

You have a variety of rights in respect of your data, including the rights to see, update, restrict and object to the use of or withdraw use of your data. In particular, depending upon why we hold your data, you may have the right to request:

- Access to the personal data we hold about you, including how we first obtained your details, free of charge in most cases (this is known as a 'Subject Access Request').
- The correction of your personal data when incorrect, out of date or incomplete.
- That we stop using your personal data for direct marketing (either through specific channels, or all channels).
- That we delete your personal data from our systems (this is known as the "Right to be Forgotten").
- That we no longer process your data automatically to decide whether particular marketing activities are likely to be of interest or suggest an appropriate donation level based on your previous donation history. This is known as profiling and helps us to ensure that our marketing is relevant and appropriate.

You can contact us to request to exercise these rights at any time.

Subject Access Requests

You have the right to request a copy of the personal information we hold about you. We will provide this as soon as possible, and within a month unless there are specific reasons why this would not be possible. We will always let you know if this is likely to be the case.

Correction of Personal Data – The Right of Rectification

If your personal data is inaccurate, you have the right to have the data rectified, by Oxfam Ireland, without undue delay.

If your personal data is incomplete, you have the right to have data completed, including by means of providing supplementary information.

The right of rectification is restricted in certain circumstances under the Data Protection Act 2018. More information about the restriction of individual rights can be found <u>here</u>.

Opting out of Direct marketing

You have the right to stop the use of your personal data for direct marketing activity through all channels, or selected channels. We will always comply with your request.

Where we are sending you direct marketing on the basis of our legitimate interest, you can also ask us to stop. In the case of postal marketing sent on this basis, we will always comply with your request to opt-out. Similarly, where we send email marketing on a soft opt-in basis, we will also comply with all requests to opt out.

Right to be Forgotten

Upon request we will delete your personal data from our systems, to the extent that we are permitted to by law or regulatory guidelines. For instance, under HMRC rules we are required to retain financial data for 7 years for audit purposes in NI and seven years for the Revenue Commissioners in ROI and so will not be able to delete donation details until this time period has elapsed

Opting out of profiling

Upon request we will cease using your personal data to decide whether you would be interested in particular updates and other marketing. Such requests may lead to you not hearing from us in future.

Checking your identity

To protect the confidentiality of your information, we will ask you to verify your identity before proceeding with any request you make under this Privacy Notice.

If you have authorised a third party to submit a request on your behalf, we will ask them to prove they have your permission to act.

How to find out more, or make a complaint about Oxfam Ireland's approach to data protection

If you would like more information, would like to make a complaint or to update your details or have any questions about this policy, please contact us by email at <u>IRL-</u> <u>DataProtectionOfficer@oxfam.org</u> or write to us at:

write to us at:

Data Protection, Oxfam Ireland, Portview House, Thorncastle Street, Ringsend, FREEPOST F927, Dublin 4,

Or

Data Protection, Freepost RLXK-TUAJ-ZESZ, 115 North Street, Belfast, BT1 1ND

Or call us on +353 (0) 1 672 7662 (ROI) or +44 (0) 28 9023 0220 (NI)

In ROI, you have the right to make a complaint at any time to the Office of the Irish Data Protection Commissioner, the Irish supervisory authority for data protection issues www.dataprotection.ie. You can contact them by calling +353 578 684 800 or +353 761 104 800.

In NI, you have the right to make a complaint at any time to the Information Commissioners office <u>https://ico.org.uk/</u>. You can contact them by calling 0303 123 1113.

We would, however, appreciate the chance to deal with your concerns in the first instance.

Changes to Oxfam Ireland's Privacy Policy

This Privacy Policy may be updated from time to time so you may wish to check it each time you submit personal information to Oxfam Ireland. The date of the most recent revisions will appear on this page. If you do not agree to these changes, please do not continue to use any of Oxfam Ireland websites to submit personal information to Oxfam Ireland. If material changes are made to the Privacy Policy, we will notify you by placing a prominent notice on the website.

Privacy FAQs

Q. Does Oxfam Ireland obtain data from other organisations?

A. Oxfam Ireland receives data from a limited number of Third Parties, including:

CACI Ltd - who provide summarised data at postcode level (this is typically 16 houses). This includes data such as age, income, house type, and the ages of children in the household. We may use this information to decide who to target for our marketing campaigns, so as to improve the effectiveness of our fundraising, and to ensure we do not send out marketing information which is unlikely to be of relevance.

UK changes - who provide data on UK house movers and the deceased so that we can keep our records up to date and make sure we only send marketing materials where appropriate.

Data Ireland - who provide data on ROI house movers and the deceased so that we can keep our records up to date and make sure we only send marketing materials where appropriate.

Publicly available sources such as Twitter, Facebook, LinkedIn, parliamentary records, or statements which you make publicly, depending upon our relationship with you - in particular we are likely to collect these in connection with our campaigning activities

From the following suppression services;

The Mail Preference Service (MPS), which ensures we do not send unsolicited mail to those who have indicated they do not wish to receive it.

The Telephone Preference Service (TPS), which ensures we do not telephone people who do not wish to receive unsolicited phone calls.

The Fundraising Preference Service (FPS), which ensures we do not send unsolicited marketing material to people who have indicated that they do not wish to hear from Oxfam Ireland.

Q. Does Oxfam Ireland use profiling as part of its marketing campaigns?

A. How we target our marketing campaigns (profiling)

Profiling is a common technique used in direct marketing and involves analysing data to improve the targeting of communications. Oxfam Ireland uses profiling techniques to help ensure our communications are relevant. Profiling allows us to target our resources effectively, which donors consistently tell us is a key priority for them. It enables us to raise more funds, sooner, and more cost-effectively, than we otherwise would. The data may have been provided to Oxfam Ireland by our supporters when responding to our marketing campaigns, or when using our website, or social media sites such as Facebook. It may also have been provided by external organisations.

When building a profile, we may analyse geographic, demographic and other information relating to you, as well as your previous responses to our marketing campaigns. We do this in order to determine whether we believe a particular marketing campaign might be of interest. Some of the data is provided by external organisations and may be provided at an aggregate level (e.g. by postcode). Where it relates to you as an individual, we check that

you have provided your express consent to the relevant third party for this use of your data. This helps to maximise the effectiveness of our campaigns and to minimise the wastage that would result from sending marketing information where it is not of interest. You have the right to request we cease this profiling.

Updated: 14/11/2019