

## Mission 44

### PRIVACY POLICY

#### 1. Introduction

Mission 44 (**M44, we, our** or **us**) is committed to protecting and respecting your privacy. Your personal information (such as your name and contact details, known as 'personal data') is protected by specific legislation:

- The Data Protection Act 2018
- General Data Protection Regulation (UK GDPR) (Regulation (EU) 2016/679)

We take our responsibilities around data very seriously, and it's important to us that you understand how and why we ask for and work with your details when you engage through our website and social media pages. Your privacy is important to us and we have policies to ensure that we collect only the data that we need to carry out our business, and that we don't keep it any longer than we need to.

At Mission 44, everything we do is aimed at transforming the lives of young people facing disadvantage and discrimination, by creating opportunities for young people from marginalised backgrounds to fulfil their potential in education, at work and as future leaders. We seek to develop a greater understanding of our supporters through their personal data in order to help us give them the best possible experience, and to fundraise and campaign more efficiently so that we can build a fairer society.

This Privacy Policy explains why and how we will use the personal information that we have obtained from you or others in connection with your use of our websites, with whom we share it and the rights you have in connection with the information we use.

This policy applies to our website located at [www.Mission44.org](http://www.Mission44.org) and related websites, social media accounts (together, the Site) and the services you can access through them.

Mission 44 is the controller in relation to the processing activities described below. This means that Mission 44 decides why and how your personal information is processed in connection with those activities. We never sell or swap your details with any other organisation for their marketing purposes.

If you would like more information on anything in this policy, please contact us at [info@Mission44.org](mailto:info@Mission44.org) or write to us at 81 Rivington St, London EC2A 3AY.

## 2. Information we collect about you

We receive personal information about you that you give to us (i.e. contact details, information you submit online via our Site and correspondence), that we collect from your use of the Site (i.e. device and Site activity data, traffic data and communication data) and that we obtain from other sources (i.e. account setup details). We only collect personal information that we need and that is relevant for the purposes for which we intend to use it.

### 2.1. Personal Information you give us

This is information about you that you give to us by entering information via the Site, account registration on our Site, or our social media pages or by corresponding with us by phone, email or other means and is provided by you entirely voluntarily. The information you give to us can include your name, title and contact details (such as phone number, email address, postal address, social media handle), enquiry details, your opinion of our products, your comments on them and services and certain marketing preferences

If you do not provide this information to us we may not be able to contact you and/or resolve your queries effectively.

### 2.2. Information that we collect about you

- your name, title and contact details (email address, telephone number, postal address, social media handle);
- any information you include in correspondence you send to us or in forms you submit to us or when using our Site or social media pages;
- details of your donations and purchases;
- your marketing preferences;
- any personal information included in your entries to competitions that we run;
- your identification information when exercising the rights that you have in relation to our processing of your personal information (see further [Your rights in relation to your personal information](#))
- details of any transactions between you and us;
- information you give us when you contact us with a query or issue;
- any information within correspondence you send to us.

### 2.3. Information we collect about you from your use of the Site

Each time you use the Site we automatically collect the following information:

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- the following technical information: a unique identification code for our authentication system, the internet protocol (IP) address of your device and details regarding the type of browser software you use to access the Site;
- details of your use of the Site, namely traffic data, weblogs and other communication data, including where and when you clicked on certain parts of the Site and details of the webpage from which you visited it;
- the date and time you used our Site;
- the pages you visited on our Site and how long you visited us for;
- [your GPS location (where you have permitted access to this)];
- the website address from which you accessed our website;
- details regarding when and how you consented to receive marketing communications from us (including the date you provided your consent); and
- cookie, pixels and beacon identification information (for more information please see our [Cookie Policy](#)).

If you do not provide this information, you may be unable to access some or all of the Site or its features.

## 3. Use of your personal information

We use your personal information for a variety of reasons. We rely on different legal grounds to process your personal information, depending on the purposes of our use and the risks to your privacy. You will only receive unsolicited email and SMS marketing communications from us if you have consented to receiving marketing email and SMS messages from us (you can opt-out of receiving them at any time). We do not share your personal information with companies that would send their marketing to you.

We use your personal information in the following ways:

### 3.1. Where you have provided CONSENT

We may use and process your personal information for the following purposes where you have **consented** for us to do so:

- to contact you via email or SMS (as you have indicated) with marketing information about our products, events, product launches, competitions, exciting offers and services (see [Marketing](#) for further details).

You may withdraw your consent for us to use your information in any of these ways at any time. Please see [Your rights over your personal information](#) for further details.

### 3.2. Where necessary to comply with our LEGAL OBLIGATIONS

We will use your personal information to comply with our legal obligations:

- to keep a record relating the exercise of any of your rights relating to our processing of your personal information;
- to take any actions in relation to health and safety incidents required by law; and
- to handle and resolve any complaints we receive relating to the services and products we provide.

### **3.3. Where necessary for us to pursue a LEGITIMATE INTEREST**

We may use and process your personal information where it is necessary for us to pursue our **legitimate interests** as an organisation for the following purposes:

Processing necessary for us to promote our organisation, and measure the reach and effectiveness of our campaigns

- for analysis and insight conducted to inform our marketing and fundraising strategies, and to enhance your experience with Mission 44;
- to tailor and personalise our marketing communications, campaigns and fundraising materials based on your attributes
- to fulfil and complete your donations, purchases and other transactions entered into with us;
- to contact you with targeted advertising delivered online through social media and other online platforms operated by other companies, unless you object. You may receive advertising based on information about you that we have provided to the platform or because, at our request, the platform has identified you as having similar attributes to the individuals whose details it has received from us. To find out more, please refer to the information provided in the help pages of the platforms on which you receive advertising from us;
- to send you electronic marketing information after you have purchased a product or service from us, made a purchasing enquiry or requested information of interest. At the time we first collect your details we will give you a simple way to opt out and object to our sending you electronic marketing information and this option will be repeated in every subsequent marketing message we send you. We will only contact you with information about our own similar products and services, which we hope you will like. You have the right to object to us sending you this information at any time;
- to identify and record when you have received, opened or engaged with our Site, or social media or other electronic communications (please see our [Cookie Policy](#) for more information); and
- in some cases we may use automated methods to analyse, combine and evaluate information that you have provided to us. We collect and analyse this information in this way so that we can deliver the most appropriate customer experience to you by tailoring and making relevant all our service and communications.

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Processing your data is necessary for us to support you with your enquiries

- to respond to correspondence you send to us and fulfil the requests you make to us.

Processing necessary for us to respond to changing market conditions and the needs of our supporters

- to analyse, evaluate and improve our engagement so that your visit and use of our Site and social media pages are more useful and enjoyable (we will generally use data amalgamated from many people so that it does not identify you personally);
- to undertake market analysis and research (including contacting you with supporter surveys) so that we can better understand you;

Processing necessary for us to operate the administrative and technical aspects of our charity efficiently and effectively

- to administer our Site, and our social media pages and for internal operations, including troubleshooting, testing, statistical purposes;
- for the prevention of fraud and other criminal activities;
- to verify the accuracy of data that we hold about you and create a better understanding of you;
- for network and information security in order for us to take steps to protect your information against loss or damage, theft or unauthorised access;
- to comply with a request from you in connection with the exercise of your rights (for example where you have asked us not to contact you for marketing purposes, we will keep a record of this on our suppression lists in order to be able to comply with your request);
- for efficiency, accuracy or other improvements of our databases and systems, for example, by combining systems or consolidating records we hold about you;
- to enforce or protect our contractual or other legal rights or to bring or defend legal proceedings;
- to inform you of updates to our terms and conditions and policies; and
- for other general administration including managing your queries, complaints, or claims, and to send service messages to you.

### **3.4. Where processing is in your VITAL INTERESTS**

We will use your personal information where this is in your vital interest.

### **3.5. Marketing communications**

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If we have requested your consent and you give your consent, we may use your personal information to contact you by email or SMS (as you indicate) to send you newsletters or information on our work. If you do not wish to receive email communications from us, please inform us by using the unsubscribe link inside the email or code within the SMS, by sending an email to [info@Mission44.org](mailto:info@Mission44.org)

If you opt-out of receiving marketing communications from us, we keep your email address on our suppression list indefinitely to ensure that we comply with your wishes. Please see further section 7:

## **The periods for which we retain your personal information**

### **4. Disclosure of your personal information by us**

We only disclose your personal information outside our organisation in limited circumstances. If we do, we will put in place a contract that requires recipients to protect your personal information, unless we are legally required to share that information. Any suppliers or other recipients that work for us will be obliged to follow our instructions.

We may disclose your information to our third party service providers, agents and subcontractors (**Suppliers**) for the purposes of providing services to us or directly to you on our behalf, including the operation and maintenance of our Site, and social media pages. Our Suppliers can be categorised as follows:

<b>Recipient / relationship to us</b>	<b>Industry sector (&amp; sub-sector) or recipient and purpose of disclosure</b>	<b>Location</b>	<b>Category of Personal Data</b>
Advertising, PR, digital and creative agencies	Media (Advertising & PR)	EEA	All personal information collected
Banks, payment processors and financial services providers	Finance (Banking & Payment Processing)  <i>To collect payment for any goods you purchase through our website, we will utilise third-party payment processing services. These will be hosted</i>	EEA	All personal information collected (not including Site traffic data)

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	<i>on the servers that operate their website.</i>		
Service Providers for email marketing campaigns.	Mailchimp and its group companies (service providers).  <i>To manage outbound email marketing communications we send to you and their associated campaigns. Some of the webpages you access on the Site are provided by Mailchimp and hosted on the servers that operate their website</i>	EEA and USA	All personal information collected (not including Site traffic data)
Cloud software system providers, including database, email and document management providers	IT (Cloud Services)	EEA	All personal information collected (not including Site traffic data)
Delivery and mailing services providers	Logistics (Delivery Service)	EEA	Personal information to enable
Donation service providers	Charitable donation processing services	EEA	All personal information collected (not including Site traffic data)
Facilities and technology service providers including scanning and data destruction providers	IT (Data Management)	EEA	All personal information collected
Competition data capture providers	Media (PR and Social Media)	EEA	All personal information collected

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Health and safety claims administrators and consultants	Health & Safety (Claims)	EEA	All personal information collected (not including Site traffic data)
Insurers and insurance brokers	Insurance (Underwriting & Broking)	EEA	All personal information collected (not including Site traffic data)
Legal, security and other professional advisers and consultants	Professional Services (Legal & Accounting)  <i>To provide us with advice in relation to our organisation, including our legal, financial and other obligations and claims.</i>	EEA	All personal information collected
Market and customer research providers	Media (Market Research)	EEA	All personal information collected
Social media platforms	Media (Social Media)	EEA and USA	All personal information collected
Website and data analytics platform providers	IT (Data Analytics)  <i>To assist with statistics and provide us with basic analytical tools for search engine optimisation and marketing purposes in order to improve our services</i>  <i>Google, Inc. and its group companies (service providers)</i>	EEA and USA	Website traffic data, IP address and browser details.



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Website developers	IT (Software Development)	EEA	All personal information collected
Website hosting services providers	IT (Hosting) <i>To support, maintain and host the Site, including the software and hardware infrastructure required for it to operate/be accessible online and to keep a backup of your personal information. We also use online IT service providers to provide contract execution services</i>	EEA	All personal information collected

When we use Suppliers, we only disclose to them any personal information that is necessary for them to provide their services and only where we have a contract in place that requires them to keep your information secure and not to use it other than in accordance with our specific instructions.

We may disclose the personal information to other third parties if we are under a duty to disclose or share your information in order to comply with any legal or regulatory obligation or request, including by the police, courts, tribunals or regulators.

## 5. Transfers of your personal information outside of Europe

We may transfer your personal information outside of Europe. We take measures to protect your personal information.

The personal information you provide to us may be transferred or stored in countries located outside of the UK and EU. By way of example, if any of our servers or those of our third party service providers are from time to time located in a country outside of the UK and EU or if our third party suppliers themselves send personal Information out of these jurisdictions. These countries may not have similar data protection laws to the UK and may not have adequate data protection laws equivalent to those in the UK and EU.

The non-UK or EU countries to which we transfer your personal data are listed in the table in section 4 Disclosure of your personal information by us.

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If we (or our third party suppliers) transfer or store your information outside of the UK or EU in this way, we will take steps to ensure that appropriate safeguards are taken with the aim of ensuring that your privacy rights continue to be protected as outlined in this policy and as required by applicable law. These steps include imposing contractual obligations on the recipient of your personal information or ensuring that the recipients are subscribed to 'international frameworks' that aim to ensure adequate protection. We may rely on adequacy decisions about certain countries for data transfers to countries outside the UK. We will only disclose personal information that is necessary for the recipients of your personal data to provide the service that they are undertaking. We will aim to anonymise your information or use aggregated non-specific data sets where ever possible.

Please contact us using the details at the end of this policy for more information about the protections that we put in place and to obtain a copy of the relevant documents. If you use our services whilst you are outside the EU, your information may be transferred outside the EU in order to provide you with those services.

## **6. Security and links to other websites**

We take the security of your personal information seriously and use a variety of measures based on good industry practice to keep it secure. Nonetheless, transmissions over the internet and to the Site may not be completely secure, so please exercise caution. When accessing links to other websites, their privacy policies, not ours, will apply to your personal information.

We employ security measures to protect the information you provide to us, to prevent access by unauthorised persons and unlawful processing, accidental loss, destruction and damage. When we have provided (or you have chosen) a password allowing you access to certain benefits of the Site, you are responsible for safeguarding it and keeping it confidential and you promise not to allow it to be used by third parties. Unfortunately, the transmission of information via the internet is not completely secure. Although we will do everything possible to protect your personal information, we cannot guarantee the security of any personal information you disclose online. You accept the inherent security implications of using the internet and will not hold us responsible for any breach of security unless we are at fault.

The Site may contain links to other websites run by other organisations which we do not control. This policy does not apply to those other websites, so we encourage you to read their privacy policies. We are not responsible for the privacy policies and practices of other websites (even if you access them using links that we provide) and we provide links to those websites solely for your information and convenience. We specifically disclaim responsibility for their content, privacy practices and terms of use, and we make no endorsements, representations or promises about their accuracy, content or thoroughness. Your disclosure of personal information to third party websites is at your own risk.

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In addition, if you link to the Site from a third party website, we cannot be responsible for the privacy policies and practices of the owners and operators of that third party website and recommend that you check the policy of that third party website.

## **7. The periods for which we retain your personal information**

We will not hold your personal information in an identifiable format for any longer than is necessary for the purposes for which we collected it. The periods for which we hold your personal information will depend on the type of personal information and whether you are a user of the subscription services we provide to a subscribing client or of a prospective/trialling client, or a visitor to the Site. These periods also apply where we share your information with suppliers who process your personal information on our behalf.

We want to make sure that we have up to date records for as long as you are actively supporting or engaging with Mission 44, so for as long as you take actions on our behalf or engage with us, such as participate in our campaigns, donate to us or correspond with us through our Website and Social Media Pages.

Once you are no longer an active supporter, we will keep your data for a set period of time, which we calculate depending on the information that you originally provided, and why you gave it to us. At the end of this time period, we will remove any personal details from our records of you, to ensure that any information is entirely anonymous.

In general, we will keep records of financial donors for at least seven years, to meet our requirements for any Gift Aid audit from HMRC. If we have asked for sensitive personal data specific to an event, we will dispose of this data within a month after the event.

You can find more detailed information on how long we keep your data for, and other timescales that might apply below:

- In most cases we will keep records for seven years after your last donation to us. This ensures that we keep the information we need for any financial audit (including Gift Aid audits). The seven-year time period applies to most people, but you should be aware of the exceptions below:
- If you have a relationship with our Philanthropy Team, we will keep your information for 30 years. These are very personal relationships and so it's important that we have detailed records of past work if a supporter chooses to work with us again.
- If you are a legacy supporter then we will keep your records for 10 years after your legacy case is closed. We want to make sure that we have the records we need to administer any legacy gifts in the way you want. Legacy records will always be deleted after 100 years at the absolute maximum.

If none of these circumstances apply to you, then we will keep your data for four years. We want to make sure that we have appropriate records of any conversations or enquiries, in case you ask us to come back to them later.

At the end of this time period, we will remove your personal details from our records, to ensure that they are entirely anonymous. We keep records on how our supporters have interacted with us, but not of who those supporters are. This helps us to understand how to use our resources in the future, so that we can raise funds in the most effective way.

You also have a right to be forgotten, which means that you can ask us to delete your personal details before the end of the time limits we've listed above. You should know that there are some circumstances where we may need to keep your details, for example, in order to comply with a legal obligation. If this situation occurs then we will explain and discuss these circumstances with you.

If you would like to discuss or exercise this right, please do get in touch by contacting us at [info@Mission44.org](mailto:info@Mission44.org).

## 8. Your rights over your personal information

You have a number of rights in relation to your personal information under data protection law. In relation to certain rights, we may ask you for information to verify your identity and, where applicable, to help us to search for your personal information. Except in rare cases, we will respond to you within 30 days after we have received this information or, where no such information is required, after we have received full details of your request.

You have the following rights, some of which may only apply in certain circumstances:

- ✓ to **be informed** about the processing of your personal information (this is what this statement sets out to do);
- ✓ to have your personal information **corrected if it is inaccurate** and to have **incomplete personal information completed**;
- ✓ to **object to processing** of your personal information;
- ✓ to **withdraw your consent** to processing your personal information;
- ✓ to **restrict processing** of your personal information;
- ✓ to have your personal information **erased**;
- ✓ to **request access** to your personal information and information about how we process it;

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- ✓ to **electronically move, copy or transfer** your personal information in a standard, machine-readable form; and
- ✓ rights relating to **automated decision making**, including profiling.

To exercise these rights, please contact us using the details at the end of this policy.

You have the right to lodge a complaint with a data protection regulator in Europe, in particular in a country you work or live or where your legal rights have been infringed. The contact details for the Information Commissioner's Office (**ICO**), the data protection regulator in the UK, are available on the [ICO website](#), where your personal information has or is being used in a way that you believe does not comply with data, however, we encourage you to contact us before making any complaint and we will seek to resolve any issues or concerns you may have.

## 9. Changes to our Privacy Policy

Please check this page regularly for changes to this policy. We will notify you of changes via your account and/or by email (if we hold a valid email address for you).

We may review this policy from time to time and any changes will be notified to you by posting an updated version on this Site and/or by contacting you by email or via your account. Any changes will take effect 7 days after we post the modified terms on our website or after the date we notify by email or via your account. We recommend you regularly check for changes and review this policy when you visit this Site. If you do not agree with any aspect of the updated policy, you must promptly notify us and cease using this Site.

## 10. Contact and legal information

You can contact us with your queries in relation to this policy or for any other reason at any time.

To contact us for any reason, including to exercise any of your rights in relation to your personal information, please write to Mission 44 at the address below or email us at [info@Mission44.org](mailto:info@Mission44.org).

Mission 44's company registration number is 13792350, charity number is 1199596 and registered office address is at 81 Rivington St, London, EC2A 3AY.