



## END Fund (US and UK) Data Protection Policy

### Privacy Statement

#### Summary and Scope

The END Fund respects your privacy and is committed to protecting your personal data. This privacy notice will inform you as to how we look after your personal data when you visit our website or donate to us. It will also tell you about your privacy rights and how the law protects you. This privacy notice is set out below; alternatively you can download a pdf version of the policy here [LINK].

If you are applying to work for the END Fund, please read our staff privacy statement here [LINK], which explains how we will use any personal data you provide as part of the application process.

#### Who We Are

##### Controllers

This privacy statement applies to data processed about you by the END Fund (a UK charity), and the END Fund Inc. (a US 501(c)(3) non-profit).

- **The END Fund** is a company limited by guarantee registered in England and Wales (company number 063540698) and a registered UK charity (number 11225745). Its registered office is 495 Green Lanes, Palmers Green, London, N13 4BS, United Kingdom.
- **The END Fund Inc.** is a tax-exempt charitable organisation registered in the United States (registration EIN 27-3941186). Its address is 2 Park Avenue, 18th Floor, New York, NY 10016, USA.

The END Fund and the END Fund Inc. are jointly the controllers and responsible for your personal data (referred to together as "we", "us" or "our" in this privacy notice).

If you have any questions about this privacy notice, including any requests to exercise your legal rights, please contact us at +1 646-690-9775.

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues ([www.ico.org.uk](http://www.ico.org.uk)). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

##### Third-Party Links

This website, [www.end.org](http://www.end.org), 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. We encourage you to read the privacy notice of every website you visit.

#### Data We Collect

Personal data, or personal information, means any information about an individual by which that person can be identified. It does not include data where the identity has been removed (anonymous data). We may collect, use, store and transfer different kinds of personal data about you:

- **Identity Data** includes first name, last name, username or similar identifier, title, date of birth and gender.
- **Contact Data** includes billing address, email address and telephone numbers.
- **Financial Data** includes bank account and payment card details.
- **Donation Data** includes details about donations that you have made to us, such as the amount you have donated, the number of donations, and the information included in any Gift-Aid declarations to us (if you are donating from the UK).
- **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.
- **Usage Data** includes information about how you use our website.
- **Communications Data** includes your preferences in receiving newsletters and other fundraising materials from us and your communication preferences.
- **Professional Data** includes details about work you do that is relevant to our own work.

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

## How We Collect Your Personal Data

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

- **Direct interactions.** You may give us your Identity, Contact, and Communications Data by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:
  - subscribe to our newsletters or other publications; or
  - use our contact form.
- **Automated technologies or interactions.** As you interact with our website, we may automatically collect Technical Data and Usage Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, server logs and other similar technologies. We may also receive Technical Data about you if you visit other websites employing our cookies.
- **Third parties or publicly available sources.** We may receive personal data about you from various third parties and public sources as set out below:
  - *Technical Data* from analytics providers such as Google.
  - *Identity, Contact, Financial, Donation and Communications Data* from providers of fundraising payment platforms such as Virgin Money Giving (if you donate in GBP) or Network for Good (if you donate in USD).
  - *Identity, Contact, and Professional Data* from data suppliers such as Muck Rack if your work relates to our programmes, for instance if you are a journalist reporting on health, philanthropy, or on the places where we deliver our programmes.

## How We Use Your Personal Data

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

- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests. 'Legitimate interest' means the interest of our charity in conducting and managing our work to achieve our charitable purpose as effectively as possible. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by contacting us
- Where we need to process your data in order to comply with our legal obligations.

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

## Purposes for Which We Will Use Your Personal Data

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

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

<b>Purpose/Activity</b>	<b>Type of Data</b>	<b>Lawful Basis for Processing, including Basis of Legitimate Interest</b>
To receive your donation and send a thank you message	Identity Contact Financial Donation Communications	Necessary for our legitimate interests (to receive donations that support our charitable work, and to thank our supporters)
To send you newsletters and other fundraising information that you have subscribed for	Identity Contact Communications	Necessary for our legitimate interests (to inform you about our work and ask you to support us in future)  Your consent (for email or text message communications)
To maintain our accounts and have them audited in line with the relevant law and to comply with our disclosure obligations to the relevant tax authorities and regulators	Identity Contact Financial Donation	Necessary to comply with our legal obligations
To respond to queries and feedback from you	Identity Contact Donation Communications	Necessary for our legitimate interests (to respond to correspondence and manage our relationship with you)
To analyse your work if it is relevant to our work and to contact you about it	Identity Contact Professional Communications	Necessary for our legitimate interests (to understand your work in our field and to build and maintain a professional relationship with you)

To administer and protect our charity and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	Identity Contact Technical	(a) Necessary for our legitimate interests (for running our charity, provision of administration and IT services, network security, to prevent fraud and in the context of a charity reorganisation or group restructuring exercise) (b) Necessary to comply with a legal obligation.
To analyse the interests and motivations of our supporters so that we can plan and run fundraising campaigns that they will find interesting and that will motivate them to support us	Identity Contact Financial Donation Communications	Necessary for our legitimate interests (to improve and deliver the fundraising activities that support our charitable work)
To use data analytics to improve our website, supporter relationships and experiences	Technical Usage	Necessary for our legitimate interests (to keep our website updated and relevant, and to inform our fundraising strategy)

## Opting Out

You can ask us to stop sending you newsletters and fundraising messages at any time by contacting us.

## Change of Purpose

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

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

## Disclosures of Your Personal Data

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

- **Service providers** acting as our processors who provide IT and other administrative service to us.
- **Professional advisers** acting as processors or controllers, such as our lawyers, bankers, and auditors who provide professional services to us.
- **Tax authorities, regulators** and **other authorities** acting as data controllers who require us to provide information in certain circumstances.
- **Another charitable organisation** if we were to merge with that organisation.

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

## International Transfers

When we share your data between the END Fund and the END Fund Inc., this involves transferring your data outside the European Economic Area (EEA). Furthermore, many of our

suppliers are based outside the European Economic Area (EEA) so their processing of your personal data will involve a transfer of data outside the EEA.

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

- Transfers between the END Fund and the END Fund Inc. are governed by an agreement that incorporates specific contractual clauses approved by the European Commission, which give personal data the same protection it has in Europe.
- The country to which the data is transferred has been deemed to provide an adequate level of protection for personal data by the European Commission.
- Where we use certain service providers, we may use specific contractual clauses approved by the European Commission, which give personal data the same protection it has in Europe.
- Where we use providers based in the United States, 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*.

Please contact us if you want further information on the specific mechanism used by us when transferring your personal data out of the EEA.

### **Data Security**

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

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

### **Data Retention**

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

Details of retention periods for different aspects of your personal data are available in our database; we will provide a report upon request.

In some circumstances, you can ask us to delete your data; see below for further information.

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

## Your Legal Rights

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

- **Request access** to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
- **Request correction** of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.
- **Request erasure** of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.
- **Object to processing** of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.
- **Request restriction of processing** of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.
- **Request the transfer** of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.
- **Withdraw consent at any time** where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

If you wish to exercise any of the rights set out above, please contact us at +1 646-690-9775.

### **No Fee Usually Required**

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

### **What We May Need From You**

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

### **Time Limit to Respond**

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

### **Changes to the Privacy Notice**

This notice was last updated on 19 May 2018.