

ALIMA UK Privacy Policy

The Alliance for International Medical Action, UK
Registered in England and Wales
Charity No. 1175796

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ALIMA UK Privacy Policy

1. Introduction

The Alliance for International Medical Action UK ("ALIMA UK") is a registered charity in England and Wales (charity number 1175796).

The Alliance for International Medical Action ("ALIMA") is an organisation made up of different entities around the world, details of which are available on our website. For the purposes of this Privacy Policy, ALIMA UK is the controller and responsible for your personal data.

ALIMA UK values your privacy and is committed to protecting your personal data. This Privacy Policy explains how we collect and use your personal data through your use of this website, including any data you may provide when you sign up to our newsletter or donate, and how we protect your information in line with GDPR (including as it applies in the UK pursuant to the European Union (Withdrawal) Act) and the Data Protection Act 2018.

Please read this Privacy Policy carefully to understand how we handle your personal data.

2. Summary

This summary provides an overview of what you can expect from this privacy policy and how ALIMA UK handles your personal data.

We explain:

- Our contact details for how to reach us
- What information we collect, use, and how we use it
- Where we get your personal data from
- The lawful bases that allow us to process your personal data
- How long we keep your information
- How we keep your information secure
- Who we share your information with
- How and when we transfer your information outside the UK
- Your data protection rights
- How to complain and exercise your data protection rights

3. Contact Details

If you have any questions about this Privacy Policy or about the use of your personal data or you want to exercise your privacy rights, please contact us in the following ways:

- Post: ALIMA UK, 124 City Road, London, EC1V 2NX, United Kingdom
- **Telephone:** +44 203 962 5752

• Email: info@uk.alima.ngo

For information on how to make a complaint, please refer to section 13 – How to Complain.

4. What Information We Collect and Use

We may collect, use, store and transfer different kinds of personal data about you. This includes, broadly:

- Names and contact details, including addresses, email addresses, telephone numbers and date of birth
- Gender
- Nationality and country of residence
- Your profession
- Payment or banking details
- Donation history
- Taxpayer information (for Gift Aid purposes)
- Marketing preferences and records of consent
- Technical and usage data

As you interact with our website(s), we may automatically collect technical and usage data about your equipment, browsing actions and patterns. We collect this personal data by using cookies and other similar technologies (with your consent, where required by applicable law). We use cookies to understand how our website is used and improve your browsing experience. For more information about the cookies we use and how to change your cookie preferences, please see our Cookie Policy available on our website.

5. Where We Get Personal Data From

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

- Your interactions with us (i.e. when you visit our website(s), sign up to our newsletter, or make a donation)
- Publicly available sources (such as Companies House, the Electoral Register, LinkedIn, etc.)
- Partner charities or voluntary sector organisations (including other ALIMA entities)
- Market research organisations
- Other third parties that we may identify and engage with from time-to-time

6. Our Lawful Basis for Processing

Under UK data protection law, we must have a "lawful basis" for collecting and using your personal data. There is a list of possible lawful bases in the GDPR. You can find out more about lawful bases on the ICO's website.

We rely on one or more of the following legal bases:

- **Consent** we have permission from you after we gave you all the relevant information. To be clear, you do have the right to withdraw your consent at any time.
- **Contract** we have to collect or use the information so we can enter into or carry out a contract with you.
- **Legal obligation** we have to collect or use your information so we can comply with the law.
- **Legitimate interests** we're collecting or using your information because it benefits you, our organisation or someone else, without causing an undue risk of harm to anyone.

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 what our legitimate interests are where appropriate. Please note that it would not be possible to set out all potential uses of your personal data in this Privacy Policy. If you have any questions about our lawful basis for any particular processing activity, please contact us using the contact details at the top of this Privacy Policy.

Our legitimate interest in collecting personal data is vital for sustaining our mission. The benefits of securing funding for life-saving work far outweigh any privacy risks, especially with the safeguards we have in place. By acting responsibly and respecting individual rights, we ensure continued support for critical programs that make a lasting positive impact.

Purpose/Use	Type of data	Lawful basis
Receive donations or funding	 Names and contact details Payment and banking details Donation amount Taxpayer information (for Gift Aid purposes) 	 Legal obligation (to ensure compliance with applicable laws, such as those relating to money laundering and terrorist financing, bribery, and tax evasion) Legitimate interest This personal data is needed to receive donations, which helps us secure essential funding for life-saving programmes that benefit vulnerable populations. We may also use personal data to carry out due diligence in line with our Gift and Hospitality Policy so that we are fundraising in accordance with the law, the Code of Fundraising Practice, and our internal policies and procedures.

Maintaining records of our members and donors	 Names and contact details Gender Nationality and country of residence Profession Donation history 	Legitimate interest We collect and use personal data to keep our records updated and manage our relationship with you. You can ask us to remove such personal data if you no longer wish to be associated with us, and we will do so unless we have a specific reason to retain such information.
Organising fundraising activities and marketing campaigns	 Names and contact details Gender Nationality and country of residence Profession Donation history 	Legitimate interest We use personal data to invite private individuals or organisational representatives (who might share an interest in supporting ALIMA or ALIMA UK) to events and to embark on tailored fundraising campaigns (see more information in the row below).
For sending direct electronic marketing	 Names and contact details Marketing preferences Donation history 	 Consent (where sent to an individual) Legitimate interest (where sent to an organisation or trust) We use personal data to send marketing and tailored fundraising applications to individuals, organisations, and trusts likely to support our mission. By targeting those with a demonstrated interest in our work, we ensure our fundraising efforts are effective and resources are used efficiently, directly contributing to saving lives and improving well-being.
Service updates, including updating you about changes to our terms and privacy policy	Names and contact details	Legitimate interest We have an interest in ensuring that you are up to date and informed.
Dealing with queries, complaints or claims	Names and contact details	Legitimate interest

	Any personal data included in the relevant query, complaint, or claim	We will use your personal data to respond to your queries, complaints, or claims.
Administration and protection of our charity and our website(s) (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	 Names and contact details Technical and usage data 	Legitimate interest We collect and use personal data for running our business, provision of administration and IT services, and network security.
To deliver relevant website content to you	Technical and usage data	Legitimate interest We collect and use personal data to show you relevant content based on where you access our website from.

You are not required to provide us with any personal data, but if you do not provide us with personal data, we may not be able to process your donations or otherwise engage with you.

Special Category Personal Data

Some categories of personal data are afforded additional protections under the GDPR. These so called "special categories" of personal data include information about: (i) racial or ethnic origin; (ii) political opinions; (iii) religious or philosophical beliefs; (iv) trade union membership; (v) genetic or biometric data used for identification; (vi) health data; and (vii) data concerning a person's sex life or sexual orientation.

We do not routinely collect or process such personal data. However, in limited circumstances, such as to accommodate health or accessibility needs, where you include such information in a query, complaint, or claim, or to establish, exercise or defend legal claims, we may process special category data.

Where we do, we rely on an additional processing condition set out in the GDPR, such as explicit consent (e.g., where you include such information in a query, complaint, or claim) or the necessity for the establishment, exercise or defence of legal claims.

7. A Note on Prospect Research

Identifying prospective donors is necessary to secure donations from trusts, corporate partners, and major gifts from individuals and organisations so that we can grow our income and meet ALIMA UK's charitable objectives. Prospect research helps us to:

- Identify if a potential donor may have the capacity and propensity to give major gifts to ALIMA UK; and
- Identify how best to approach them.

Prospect research includes gathering public and freely given information from the internet, from ALIMA and ALIMA UK contacts and from ALIMA and ALIMA UK's own donor records, and creating profiles to help us identify individuals, trusts, foundations and corporations able to give at this level. This means that we:

- Create short profiles of potential donors, using public and freely given sources of data to identify people who may be able and predisposed to give major gifts. The type of information we may collect in profiles includes but is not limited to:
 - o Career history, areas of interest, and any connection to ALIMA UK
 - o Gift capacity based on visible assets and previous charitable giving
 - To the extent that it is public knowledge, information about a potential donor's nationality and family ties to a country or geographic area

The data sources we use include but are not limited to:

- Charity Commission data (which identifies trustees of grant-giving trusts, and charitable aims)
- Other sources of information about charitable trusts' giving, for example trust websites, newcharities.org, charity trade press
- Companies House data (which identifies company directors)
- Company and charity websites which profile, for example owners, senior partners, or trustees
- News articles about business, financial or philanthropic decisions
- Public media where individuals have volunteered information about their interest or experience that is related to ALIMA's mission
- Public social media accounts, e.g. a company's Facebook or LinkedIn page, or an individual's public LinkedIn or Twitter/"X" account
- Publicly available databases which could include sourcing research from companies such as Factary and Prospecting for Gold
- Create queries on our database to identify past donors who may have given at major-gift level in the past, and therefore could do so again
- Conduct database postcode reviews of current donors
- Review lists of individuals signing up to ALIMA UK fundraising events (and have opted into communications) to look at the reasons that people give, their job titles, their family names (if they are well-known/in the public eye) and postcodes. We use this information to target personalised invitations to engage further with ALIMA UK at those who are most likely to be interested.

We may use artificial intelligence (AI) tools, such as ChatGPT or Google Gemini, to assist in generating donor profiles based on publicly available information. These tools help us to identify potential donors but are used under human oversight, and we do not make any decisions about individuals using solely automated means.

We do not seek consent to conduct our prospect-research activities as defined above, because we believe we have a legitimate interest which is not overridden by the individual's fundamental rights. Our approach to prospect research complies with current law; we will update our approach should the legal position change.

We want all individuals who come into contact with ALIMA UK to have a positive experience, whether or not they are donors. We believe that the way we carry out prospect research will help us to identify potential donors efficiently, and to avoid making inappropriate or excessive approaches.

8. How Long We Keep Information

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

- Donation records will be retained for up to 6 years for financial reporting and auditing purposes.
- Marketing communications will be retained until you withdraw your consent or opt out.

Once your data is no longer required, we will securely delete or anonymise it.

9. How We Keep Personal Data Secure

We take appropriate technical and organisational measures to protect personal data against unauthorised or unlawful processing, accidental loss, destruction, or damage. These measures include access controls, encryption, secure storage, regular security assessments, and staff training on data protection. We also require our service providers to implement suitable security measures and only process personal data in accordance with our instructions. While we take reasonable steps to safeguard personal data, no system can be completely secure, and we cannot guarantee absolute security.

10. Who We Share Personal Data With

We may share your personal data where necessary with the parties set out below:

- Relevant regulatory authorities where we are legally obliged to share your personal data
- Other ALIMA entities and partner organisations we work with to deliver projects
- External auditors, inspectors and advisors
- Service providers for online donations such as FundraiseUp, Intersa, iRaiser and iGive
- Service providers and data subcontractors necessary for the functioning of our website, organisation and activities such as ADM Value, Qualicontact and Google Analytics
- Publicly on our website, social media or other marketing and information media where we have your permission to do so
- With third parties in connection with significant organisational changes, such as a merger, transfer of charitable activities, or restructuring

ALIMA UK does not sell personal data to any third parties. 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.

11. Sharing Information Outside the UK

Where necessary, we may transfer personal data outside of the UK (for example when a donor is funding an ALIMA project delivered by our international partners). These transfers are limited to trusted entities within the ALIMA group and are made in accordance with the requirements of the GDPR.

We only transfer personal data where appropriate safeguards are in place to ensure it remains protected. For example, when we transfer data to ALIMA entities in France, this is permitted under the UK's adequacy regulations – also known as a data bridge. For transfers to ALIMA entities in countries outside the EEA, such as the United States and Senegal, we use other legally approved mechanisms under applicable data protection law to ensure that personal data remains protected to a comparable standard.

In limited circumstances, we may also transfer personal data to third-party service providers located outside the UK or EEA, for example, where we use cloud-based systems or technical support services based overseas. In such cases, we ensure that appropriate safeguards are in place (such as standard contractual clauses approved for this purpose).

For further information or to obtain more information about the appropriate safeguard for any of the transfers above, please contact us using the contact details at the top of this Privacy Policy.

12. Your Rights in Relation to your Personal Data

You may have certain rights in relation to your personal data (which may be affected by the lawful basis we rely on for processing, among other things). These rights are set out below. You can find out more about your data protection rights and the exemptions which may apply on the ICO's website:

- Your right of access You have the right to ask us for copies of your personal data. You can request other information such as details about where we get personal data from and who we share personal data with. There are some exemptions which means you may not receive all the information you ask for. You can read more about this right here.
- Your right to rectification You have the right to ask us to correct or delete personal data you think is inaccurate or incomplete. You can read more about this right here.
- Your right to erasure You have the right to ask us to delete your personal data. You can read more about this right here.
- Your right to restriction of processing You have the right to ask us to limit how we can use your personal data. You can read more about this right here.
- Your right to object to processing You have the right to object to the processing of your personal data. You can read more about this right here.
- Your right to data portability You have the right to ask that we transfer the
 personal data you gave us to another organisation, or to you. You can read more
 about this right here.
- Your right to withdraw consent When we use consent as our lawful basis you have the right to withdraw your consent at any time. You can read more about this right here.

We aim to respond to all legitimate requests within one month. Occasionally, it could 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.

To make a data protection rights request, please contact us using the contact details at the top of this Privacy Policy.

13. How to Complain

If you have any concerns about our use of your personal data, you can make a complaint by contacting us using the contact details at the top of this Privacy Policy.

If you remain unhappy with how we've used your data after raising a complaint with us, you can also complain to the ICO.

The ICO's address:

Information Commissioner's Office Wycliffe House Water Lane Wilmslow Cheshire SK9 5AF

Helpline number: 0303 123 1113

Website: https://www.ico.org.uk/make-a-complaint

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