

## Seenaryo Privacy Policy

(updated July 2020)

### Introduction

This privacy policy explains how we use your data, how you can control the way in which we use that data and what actions you can take if you would like to change the way in which your data is being used. Seenaryo is a registered UK charity under the number: 1173822, and a registered Jordan NGO under the number: 201903111761.

### Why do we need your information and whose data do we collect?

Seenaryo is an arts and education charity that works with refugees and local host communities in Lebanon and Jordan. Our artistic projects and holistic approach to education support personal development, academic achievement and social cohesion – and allow people's voices to be heard. To do this well we need to know about the people who interact with us.

We hold data on people who do, or might do, the following:

- Attend Seenaryo advocacy or fundraising events
- Attend performances, exhibitions and other showcases of our work
- Take part in our programme of workshops, trainings, events and other activities
- Download and use the Seenaryo Playkit app
- Work, or apply to work, with Seenaryo
- Support Seenaryo financially and in other ways
- Subscribe to our newsletters or sign-up to receive regular updates

In limited cases we collect data on people who are under 18. Where we do this we will describe exactly the uses to which data will be put at the time of collection.

### How we obtain your data

#### From you

The majority of the information we hold about you will have been provided directly by you when you have taken part in one of more of the activities outlined above.

#### From someone other than you

In some cases we may supplement the information you have given us with data from elsewhere. Examples include adding social, economic, financial or demographic data to our visitor or fundraising information; improving or correcting contact details; or conducting appropriate due diligence to safeguard the assets and reputation of Seenaryo in the case of significant financial transactions. Sources of data could include information gathered from a news article or online media (including social media), publicly available directories and similar information such as the telephone directory, Royal Mail's National Change of Address database, Companies' House and

cultural sector audience segmentation data.

We may also obtain information about people entirely new to us. Examples include (but are not limited to):

- If you book one of our events using a third-party ticketing agency
- If you take part in a competition and agree to let us have your data or
- If an existing supporter suggested we get in touch to see if you might be interested in becoming involved with us

## What we do with your data

The core activities we carry out with your data enable us to:

- Send information to you about Seenaryo
- Provide tickets for events requiring them
- Administer donations
- Administer membership scheme(s)
- Build financial support for Seenaryo through various fundraising and marketing activities
- Process job applications
- Promote the aims and objectives of Seenaryo through any other activities not specifically mentioned
- In the case of the Playkit app, understand how you use our service in order for us to make it better

## What information we collect

We collect the following classes of information:

- Names, addresses, emails, phone numbers and other relevant contact details and preferences
- Records of donations
- Information about our relationship with you, correspondence, meeting notes, attendance at events, etc.
- Occupation, skills and professional activity, networks and interests where relevant to our needs
- Age and family information where relevant to our needs
- Financial information and interest in philanthropy where relevant to our needs
- In the case of the Playkit app, when and what data you are viewing and favoriting

## Profiling

We may use your data to group together people who have behaved, or might behave in similar ways. For example, we might find that people who had been to certain events were likely to come to similar events. If this was the case then we might "tag" your record to remind us to include you in invitations to similar events or to assess the likelihood that you might come to another type of event. We might carry out similar processes to help us organise our fundraising.

You have a specific right to ask us not to do this. If you would prefer us not to, then please contact us using the contact details below.

## Protecting your data

We keep your data secure in our database with appropriate security mechanisms in place.

In principle we do not share your data with anyone else or any other organisation unless it is necessary for the purpose for which you have given us the data or described in this notice. Examples are given below:

- We will provide information to HMRC on Gift Aid donations since we have a legal obligation to provide this information
- We may share basic information, such as name, on the attenders at an event, function or meeting with the host of the event or function
- We may pass data to other organisations, known as Data Processors, to provide specific services to us. An example would be providing data to a mailing house in order to send a newsletter or invitation. A contract is always in place with a Data Processor, and they are not allowed to do anything with your data other than that which we have requested. In these cases we never lose legal control of your data
- We provide statistical data to various institutional funders and partners

## Our responsibilities

The law requires us to tell you the legal basis upon which we process your data.

Some activities (for example sending you emails which promote Seenaryo's interests) require your consent. If the law requires your consent to process data in a certain way then we will obtain it before carrying out that activity.

Other activities are carried out to fulfil a contract or agreement. Examples include the purchase of a ticket or service. If a contract is in place then we will process your data based on that contract.

In some circumstances the law requires us to disclose information to another party. An example is the reclaim of tax on Gift Aid. If you Gift Aid a donation, then we are required to tell HMRC the name and postcode of the donor and the date(s) and amount(s) of any such donation.

In all other cases, and outside our public obligations, the law allows us to process your data if it is in our legitimate interest to do so. We may only do so if we can demonstrate a business need, and so long as your "interests or your fundamental rights and freedoms are not overriding". Practically speaking this means we carry out an exercise to check that we will not cause you harm by processing your data, that the processing is not overly intrusive and that we will only do so in a way which is described in this privacy notice.

## How long do we keep your data?

We will keep data for as long as is needed to complete the task for which it was collected.

Relationships between donors and Seenaryo are often long-term ones, and so we expect to keep your data for as long as that relationship exists, or until we no longer need it.

## Your rights

You have a variety of rights about the way we process your data. These are as follows:

- Where our use of your data requires consent, you may withdraw this consent at any time
- Where we rely on our legitimate interest to process data, you may ask us to stop doing so
- You may request a copy about the data we hold about you
- If we are carrying out profiling, you may ask us not to do so
- You may change or stop the way in which we communicate with you or process data about you, and if it is not required for the purpose you provided it, then we will do so. Activities like processing Give Aid donations may mean we cannot entirely stop processing your data. However we will always endeavor to comply with such a request.
- If you are not satisfied with the way we have processed your data then you can complain to the Office of the Information Commissioner

## Contacting us

If you have any questions about this privacy notice, about the way in which we process your data, or if you wish to change the way we use your data, including how we communicate with you, then please contact us at [info@seenaryo.org](mailto:info@seenaryo.org).