



FORGE
FOR HUMANITY

Privacy and Data Protection Policy

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ACH/JLW



PRIVACY AND DATA PROTECTION POLICY

This Privacy Policy applies to information we, FORGE for humanity (FORGE), collect about individuals who interact with our organisation. It explains what personal information we collect and how we use it. This Policy covers the collection, processing, and other use of personal data under the Data Protection Act 1998 (“DPA”) and the General Data Protection Regulations (“GDPR”).

For the purpose of compliance with DPA and GDPR Policies, the Data Protection Officer is _____, who is jointly responsible for the protection and handling of all data collected by FORGE.

If you have any comments or questions about this Policy, or would like a copy of it, you can contact us at admin@forgeforhumanity.org

PROCESSING OF PERSONAL DATA

The following table explains the types of data we collect and the legal basis, under current data protection legislation within the General Data Protection Regulation 2018, on which this data is processed.

Participants:

Purpose	Data (key elements)	Basis
Visiting our office	Name Nationality	Legitimate Interest: it is necessary for us to keep record of our visitors for the later creation of our activity and performance reports.
Enquiring about our organization and what we do	Name Nationality Reason for visit Accommodation status	Legitimate Interest: it is necessary for us to keep a record of people who are interested in our services for the later creation of our activity and performance reports.
Making use of our drop-in information point or enquiring about other available services	Name Nationality Reason for visit Accommodation status	Legitimate Interest: it is necessary for us to record this information so we can identify you, should you decide to make use of the service again in the future.
Requesting assistance with applications and procedures	Name Nationality Request Email address Phone number Address Mother's name Father's name Date of birth (DOB) Identity document (ID) number Scans of relevant documents	Legitimate Interest: it is necessary for us to keep this information so we can use it to fulfill the request you have asked of us ,or to identify you whenever you require further services from us.
Employability program	Name Email address Phone number	Legitimate Interest: it is necessary for us to keep this information so we can use it to assist you with

	Professional and educational background Curriculum Vitae (CV) Cover letter	your CV, cover letter and to recommend relevant job offers and opportunities.
Signed referral forms	Name Nationality Date of birth (DOB) Legal status Identity document (ID) number Phone number Email address	Consent: you give us your active consent to share the required information with a partner organization.

Team Members:

Purpose	Data (key elements)	Basis
Recruitment	Name Email address Phone number Location Age Professional and educational background Curriculum Vitae (CV) Reference letter	Consent: you have given your active consent.

Donors:

Purpose	Data (key elements)	Basis
Enquiring about our organisation and what we do	Name Email address Message	Legitimate Interest: it is necessary for us to read and store your message so that we can respond in the way that you would expect.
Subscribing to email updates about our work	Name Email address	Consent: you have given your active consent.
Making a donation	Name Email address Address Payment information	Legitimate Interest: this information is necessary for us to fulfill your intention of donating money and/or your expectation of receiving a confirmation message.
Website functionality	Website activity collected through cookies	Legitimate Interest: it is necessary for us to store a small amount of information, usually through cookies, to deliver functionality that you would expect, such as remembering the contents of your donation inputs before you have fully completed the process.

HOW WE COLLECT INFORMATION

1. From you when you give it to us directly: you may provide your details when you ask us for information; when you are applying for an opportunity to volunteer; or when you contact us for any other reason.
2. When you have given other organisations permission to share it with us: your information may be provided to us by other organisations if you have given them your permission. For example, this might be an organisation with whom FORGE for humanity is working in partnership. They should only do so in the way they have set out in their own Privacy Policy, which you should check when you give your details.
3. When it is available on social media: depending on your settings and the Privacy Policies of the social media platforms and messaging services you use, e.g. Facebook, Instagram or Twitter, you might give us permission to access information from those accounts or services.

HOW WE USE YOUR DATA

When you supply personal information to us, we are legally obliged, by the General Data Protection Regulation 2018, to ensure that the information you have provided is only used for the purpose for which it was intended, and to ensure that the data is kept securely.

We will only use your data in a manner that is appropriate considering the basis on which that data was collected, as set out in the table at the top of this Policy.

For example, we may use your personal information to:

- Reply to enquiries you send us.
- Identify your previous interactions with our project so that we can provide you with a better quality service.
- Handle donations that you initiate.
- Where you have specifically agreed to this, send you marketing communications by email relating to our work, which we think may be of interest to you.

WHEN WE SHARE YOUR DATA

We will only pass your data on to third parties in the following circumstances:

- You have provided your explicit consent for us to pass data to a named third party.
- You have provided your implicit consent by joining one of our services which will require contact with third parties (i.e. employability opportunities, communications with the Asylum Service, etc.).
- We use Paypal as a payment processor. We are not responsible for the Privacy Policy and practices of this third party. However, further information on Paypal's Privacy Policy can be found at the following link: <https://www.paypal.com/us/webapps/mpp/ua/privacy-full>.
- We use the donation platform Helpfreely. We are not responsible for the Privacy Policy and practices of this third party. However further information on Helpfreely's Privacy Policy can be found at the following link: <https://www.helpfreely.org/en/privacy-policy/>.
- We use the donation platform Teaming. We are not responsible for the Privacy Policy and practices of this third party. However further information on Teaming's Privacy Policy can be found at the following link: <https://www.teaming.net/condiciones-legales>.



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- We occasionally use Facebook as a host platform for polls and fundraisers. We are not responsible for the Privacy Policy and practices of this third party. However further information on Facebook's Privacy Policy can be found at the following link: <https://www.facebook.com/about/privacy/previous>.
- We have no control over, and are not responsible for the Privacy Policies and practices of these third parties.
- We are required by law to share your data.

HOW WE STORE YOUR DATA

Data recorded by our tracking and reporting tools may only be accessed by the Case Workers and Project Coordinators implementing the project, with a secure login.

Personal files and documents stored in digital format are kept in a separate, secure section of our Cloud drive, to which access is limited to the Project Coordinators, with a secure login.

If you choose to terminate your relationship with FORGE, we will store your information in an aggregated and anonymised format for statistics and reporting purposes only.

HOW LONG WE KEEP YOUR DATA

We take the principles of data minimisation and removal seriously and have internal policies in place to ensure that we only ever ask for the minimum amount of data for the associated purpose and store it only until it is no longer required.

We delete any data or file that has been unused after 5 years.

If you are one of FORGE's Participants:

- We will keep your basic information for as long as you have one of our participant ID cards, or until you ask us to delete it. We keep your information with the purpose of identifying you and the services that you have requested from us in the past. This helps us ensure quality and efficiency of our services.
- We will keep digital copies of whichever personal documents you have provided to us for as long as you have one of our participant ID cards or until we are asked to delete them, for the purpose of having a copy available for you in case you lose any documents, or in order to fulfill future enquires you might have.
- If you want to be unregistered, we will delete all your data and information within 6 months.

If you are one of FORGE's Donors:

- We will retain the personal data collected for accounting purposes for 6 years, as it is dictated by Spanish regulations.

If you are one of FORGE's Financial Partners:

- We will keep your data for as long as our relationship lasts.

RIGHTS YOU HAVE OVER YOUR DATA

You have a range of rights over your data, which include the following:

- The right to be informed: You have the right to be provided with clear, transparent and easily understandable information about how we use your information and your rights. This is why we are providing you with the information in this Privacy Policy.
- The right to access: You have the right to access your information (if we're processing it), and other supplementary information (similar to that provided in this Privacy Policy). This is so you are aware and can check that we are using your information in accordance with Data Protection laws.
- The right to correction: You have the right to require us to correct any personal data held about you that is inaccurate, and have incomplete data completed.
- The right to portability: You have the right to receive a subset of the personal data you provide us if we process it on the basis of our contract with you or with your consent in a structured, commonly used and machine-readable format and a right to request that we transfer such personal data to another party. If you wish for us to transfer the personal data to another party, please ensure you detail that party and note that we can only do so where it is technically feasible. We are not responsible for the security of the personal data or its processing once received by the third party.
- The right to erasure: This is also known as 'the right to be forgotten' and, in simple terms, enables you to request the deletion or removal of your information where there is no compelling reason for us to keep using it. This is not a general right to erasure; there are exceptions (detailed in Article 17 of the GDPR¹)
- The right to restrict processing: You have the right to 'block' or suppress further use of your information. When processing is restricted, we can still store your information, but may not use it further. We keep lists of people who have asked for further use of their information to be 'blocked' to make sure the restriction is respected in the future.
- The right to object: You have the right to object to certain types of processing, including processing for direct marketing.

A full summary of your legal rights over your data can be found on the Hellenic Data Protection Authority's website here: <https://www.dpa.gr/en>

If you would like to access the rights listed above, or any other legal rights you have over your data under current legislation, please get in touch with us at admin@forgeforhumanity.org

COOKIES & USAGE TRACKING

As is common practice with almost all professional websites, our site uses cookies, which are tiny files that are downloaded onto your computer, to improve your experience. Cookies are used by many websites and can do a number of things, e.g. remember your preferences, record your donation transactions, and count the number of people looking at a website.

We describe below what information they gather, how we use it and why we sometimes need

¹ <https://gdpr-info.eu/art-17-gdpr/>



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to store these cookies. We also share how you can prevent these cookies from being stored, however, this may downgrade or 'break' certain elements of the site's functionality.

We use cookies for a variety of reasons detailed below. Unfortunately, in most cases there are no industry standard options for disabling cookies without completely disabling the functionality and features they add to this site. It is recommended that you leave on all cookies if you are not unsure whether you need them or not in case they are used to provide a service that you use.

You can prevent the setting of cookies by adjusting the settings on your browser (see your browser *Help* for how to do this). Please be aware that disabling cookies will affect the functionality of this and many other websites that you visit. Disabling cookies will usually result in also disabling certain functionality and features of this site. Therefore, it is recommended that you do not disable cookies.

The cookies we set:

- Cookies may be used to remember if you have already registered for our email newsletter and signed up for regular news updates to ensure you only get relevant notifications.
- Cookies are used to ensure that your donation payment is processed properly and that your details are remembered throughout the transaction.
- In some special cases, we will also use cookies provided by trusted third parties.
- This site uses Google Analytics, one of the most widespread and trusted analytics solutions on the web, to help us to understand how you use the site and the ways that we can improve your experience. Google Analytics generates statistical and other information about website usage by means of cookies, which are stored on users' computers. The information collected by Google Analytics about usage of our website is not personally identifiable. The data is collected anonymously, stored by Google and used by us to create reports about website usage. Google's Privacy Policy is available at <http://www.google.com/privacypolicy.html>.
- We also use social media buttons and plug-ins on this site that allow you to connect with your social network in various ways. For these to work, social media sites including Facebook and Instagram will set cookies through our site, which may be used to enhance your profile on their site, or contribute to the data they hold for various purposes outlined in their respective privacy policies.

We hope this has clarified things for you and as previously mentioned, if there is something that you are not sure whether you need or not it is usually safer to leave cookies enabled in case it does interact with one of the features you use on our site. However, if you are still looking for more information, you can contact us at admin@forgeforhumanity.org

MODIFICATIONS

We may modify this Privacy Policy from time to time and will publish the most current version on our website. If a modification meaningfully reduces your rights, we will notify those people whose personal data we hold and are affected.