ETHIOPIAID

TRANSFORMING LIVES IN ETHIOPIA

General Data Protection Regulation (GDPR) process for Charitable Trusts and Foundations (and their Trustees)

Version	2024
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Date reviewed	January 2024 Frances Darcy Finance and Compliance Officer
Date of next Review	April 2024

Registered Charity No. 20041069 (CHY13305)
Company Limited By Guarantee. 343187 (Ireland)

Collection /Sources of/ Storing Data

All managed via the following Data Mapping exercise:

	Example
Identify data collection point	Charity Regulator/ Trust website/ Trust correspondence to Ethiopiaid
What data is collected?	Name of contact, contact details, funding capacity and interests, gift information and application deadlines
Is an info notice or consent box used at the point of data collection?	Privacy notice summary and link to full statement is on email footer/cover letters
What databases/files is the data added to?	Raiser's Edge NXT (RE NXT), individual trust folder on Ethiopiaid's system (not publicly accessible), Trust paperwork folder (kept in locked filing cabinet)
What is the data used for?	To contact regarding application eligibility/to submit a proposal/share a report/
Who can access the data internally?	Ethiopiaid staff, Clifton IT, Database consultant(s), Ethiopiaid volunteers (the latter two have signed confidentiality agreements)
Who is the data shared with externally?	No one.
How/when is the data reviewed/supplemented/updated?	Next review date set for April 2024, but receive weekly Trusts Fundraising emails, so will update sooner if necessary – in line with any change in regulations.
How long is the data kept for?	Indefinitely, unless asked to be removed. Enables us to track contact history and preferences and ensure compliance.
When and how is the data deleted?	At request of Trust for no further contact, we add 'Do Not Mail' solicit code through their Contact Preferences and record this request as an action on RE NXT. If asked to have details deleted, we would delete record from RE NXT, delete folder on system and shred all paperwork.

Notes
Data has been sourced by either the Trust donor themselves or the Trust/Charity Regulator website. **We consider this legitimate interest for storing in Ethiopiaid's records given these organisations' position as grantmakers and in order for us to achieve our objective of raising funds for Ethiopia's most vulnerable people.**

We do not share or sell contact details with third parties and store all information securely on Raiser's Edge NXT (protected by password and only accessed by Ethiopiaid staff).

Any letter correspondence is stored in a dedicated folder that is kept locked when not in use. Only the Fundraising Manager and the Finance & Compliance Officer have access to the cabinet. All other correspondence not kept is shredded immediately after use.

Ethiopiaid Privacy Statement

Short form of Ethiopiaid's Privacy Statement (below) along with a link to the full policy is on all electronic and post correspondence. This way we have made all donors and prospects aware of Ethiopiaid's data protection process. For more information on our *Privacy Statement* please click here.

'The information we collect about you is used for administration purposes and for marketing and fundraising appeals. From time to time we also analyse supporter information to ensure that our marketing and fundraising materials are appropriate and relevant. We promise to never sell or swap your details. Please visit our website to read our full privacy statement.

You can update how we communicate with you at any time by calling 01 677 5188 or emailing hello@ethiopiaid.ie.'

Consent, Legitimate Interest, Storing Information and Use of Contact Details

Consent

If a Trust website states contact details to which info can be sent, **Ethiopiaid considers that to be consent to contact - if used exclusively for that purpose**.

Legitimate Interest

We will only use name and contact details (address, email, and phone) to make eligibility enquiries to ascertain whether an application is welcome/desired format/deadline and then making an application/following up for feedback/sharing a project report. We would also use contact details to invite donors to Ethiopiaid events (including project visits). **Ethiopiaid considers this to be legitimate interest, as these organisations can reasonably expect to hear from us, given their previous donation to our projects.**

Storing Information

Regarding the storing of information on Trusts/Trustees that we are not currently applying to, this is to remind Ethiopiaid not to attempt re-application in future, due to ineligibility or request from the Trust not to share further proposals. **Ethiopiaid will keep this information using legitimate interest as it will ensure that we do not cause inconvenience to a Trust by submitting unwelcome applications**.

Profiling

GDPR regulations identify three ways of using profiling:

- General profiling.
- Decision-making based on profiling.
- Solely automated decision-making, including profiling.

Ethiopiaid's process regarding profiling is as per our Privacy Policy *When the Information is Publicly Available*: "We might also obtain personal data about individuals who may be interested in giving major gifts to charities or organisations like Ethiopiaid. In this scenario, Ethiopiaid may seek to find out more about these individuals, their interests and motivations for giving through publicly available information. This information may include newspaper or other media coverage, open postings on social media sites such as LinkedIn, and data from

the Companies Register Office. Ethiopiaid will not retain publicly available data relating to individuals without their consent, which will be sought at the earliest practical opportunity."

Ethiopiaid considers and will address the following key issues relating to GDPR:

1) The reasonable expectations of individuals based upon their relationship to Ethiopiaid.
   Contact will be based upon the preference of each Trust and/or Ethiopiaid's Trust fundraising cycle (report every 6-12 months after a grant has been received).

2) Why the individual would reasonably expect the use of their data in this way without their specific consent.
   As a grantmaking organisation which publicly welcomes unsolicited applications requesting support, Ethiopiaid considers using their data for the purpose of grant application and correspondence relating to grant application to be in compliance with GDPR lawful base for processing using legitimate interest (Article 6 (f)).

3) The rights and freedoms of individuals will not be unduly harmed.
   Ethiopiaid's Privacy Policy clearly outlines the ways in which the charity can be contacted and the process through which people/organisations can make complaints or raise objections (see *How do you contact us regarding your information?* section at the bottom of our Privacy Policy). The nature of the fundraising sent will be in compliance with personally or publicly expressed funding interests and the frequency of communications sent will be based on legitimate interest and each Trust/Grantmaker's own schedule (typically once or twice a year).