



Nisaba Privacy Policy

Updated 08.02.24

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About us

Nisaba is a Charitable Incorporated Organisation (CIO) working to relieve period poverty amongst refugees, people seeking asylum and displaced people who menstruate in the United Kingdom by providing free period products, hygiene supplies and free essential menstrual education. Our vision is to attain menstrual and health equity amongst the refugee and forcibly displaced population, many who face destitution. You can find out more in the 'About' section on our website.

Nisaba is a CIO registered in England and Wales (Number 1202627). Our registered office (for mail only) is 167-169 Great Portland Street, 5th Floor, London, W1W 5PF.

Introduction

This Privacy Policy was updated February 2024. If you have any queries regarding our Privacy Policy, please contact info@nisaba.org.uk or call us on 07935 587 164.

It is important that the personal data we hold about you is accurate and current. It is your duty to inform us if your personal data changes at any point during your relationship with us.

Purpose of Privacy Policy

This Privacy Policy aims to inform you of how Nisaba collects and processes your personal data through your use of this website and your interactions with us, including any data you may provide when you volunteer with us, take part in any fundraising or make a donation to us.

It is important that you read this Privacy Policy together with any other notices we may provide on specific occasions so that you are fully aware of how and why we are using your data. This Privacy Policy supplements any such other notices and does not override them.

Controller

Nisaba is the controller and is responsible for your personal data (collectively referred to in this policy as "Nisaba", "we", "us" or "our").

What Data we Collect and how we Collect it

We collect personal data each time you interact with us. Such interactions include being referred to our services for period care distributions or workshops, making a donation, requesting information,



applying for a volunteer or staff position, registering for an event, providing feedback, or otherwise providing your personal details.

If you are a service user, we may request your consent to collect personal data such as your age, ethnicity or gender orientation for the sole purpose of assessing our performance in providing inclusive support to people who menstruate, where funding permits.

There are three main ways in which we collect personal data from you, including:

- **Directly:** You may provide us with data in respect of your identity, next of kin, contact information, biography, financial information, transactions, and marketing and communications preferences by filling in our forms or corresponding with us via email, electronic communications, telephone, postal services or other means.
- **Automated technology:** We may automatically collect technical data about your browser actions and patterns when you interact with our website or social platforms by using cookies or other similar technologies. Cookies are text files that are placed on your computer by websites in order to collect information about your visit to our website. We may use this data to help us improve and update our website. You can turn off cookies, but please note that some parts of our website may become inaccessible or not function properly. For more information please visit (www.aboutcookies.org). We only use cookies that are strictly necessary for the functioning of our website.
- **Third party or publicly available sources:** We may receive your personal data from third parties such as advertising networks, analytics providers and publicly available sources. Additionally, this website may include links to third-party websites or services and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We are not responsible for their privacy statements. When you leave our website, we advise you to read the privacy policy of websites you visit.

How we use your Personal Data

We will only use your personal data when required as the law allows us to. We will use your personal data most commonly where:

- you have consented for us to do so;
- we need to perform the contract we are about to enter into or have entered into with you;
- it is necessary for our legitimate interests (or those of a third party), provided that your interests and fundamental rights do not override our legitimate interests; and/or
- we need to comply with a legal or regulatory obligation.

More specifically, we may use your personal data to carry out the following actions: (see table below)



Data Subjects	Purpose of Processing	Legal Basis of Processing
<p>Service Users - if you use our services, we may use your personal data as listed above to:</p>	<ul style="list-style-type: none"> ● arrange an initial consultation to understand your situation and assess whether we are able to provide our free services and products to you; ● manage our relationship with you, for example by notifying you of changes to our Policies, asking you for feedback or to take a survey; and/or ● share information with other organisations or charities, such as your original referrer or with medical, health support or legal services in order to support you when required. 	<ul style="list-style-type: none"> ● Performance of our contract with you ● Compliance with our legal or regulatory obligations ● Our legitimate business interest to improve our services
<p>Supporters and Donors - if you are a supporter or a donor, we may use your personal data as listed above to:</p>	<ul style="list-style-type: none"> ● process your donations, including claiming gift aid where applicable; ● manage our relationship with you, for example by notifying you about changes to our Policies, asking you for feedback or to take a survey; ● when you consent, keep you up to date with our work and events and with any fundraising in which you partake; ● provide you with any information that you have requested; ● aid our understanding of our supporters' interests and concerns in respect of our charity's activities, and to provide helpful or beneficial information to you; and/or ● conduct research to aid our understanding of our supporters' views in order to improve our services, and which may include contacting you to ask for feedback. 	<ul style="list-style-type: none"> ● Consent ● Performance of our contract with you ● Our legitimate business interest to improve our services
<p>Volunteers – If you are a volunteer, we may use your personal data as listed above to:</p>	<ul style="list-style-type: none"> ● process and consider your skills and experience for applicable roles within Nisaba, ensuring that your information is only be shared with Nisaba team members who are involved in your recruitment or volunteer support services; and/or ● connect you with other volunteers you may be working with, provided that you have given your consent upon acceptance of your application. 	<ul style="list-style-type: none"> ● Consent ● Performance of our contract with you ● Our Legitimate business interest to improve our services



If you Fail to provide Personal Data

Where we require your personal data under current law or the terms of our operations, and you fail to provide such data upon our request, we may have to cancel a partnership or service with you. We will notify you of any such cancellation in advance.

Disclosure and Sharing of your Personal Data

We may share your personal data with third parties which assist us with providing our services to you, for example: for the purpose of delivering distributions to service users (e.g. delivery providers such as Evri); to receive donations via our website (e.g. through JustGiving); for in person donations (e.g. via platforms such as Square Payment); or with service providers including (but not limited to) IT support, administrative support, and legal and financial advisers.

Storing your Personal Data

We have appropriate security measures to prevent your personal data from being accidentally lost, or accessed in an unauthorised way, altered or disclosed.

Data in cloud-based systems may be processed outside of the European Economic Area (EEA) and UK. We take appropriate steps to ensure your data is appropriately safeguarded when it leaves the EEA and UK for e.g., following EU standard contractual clauses.

How long do we store your Personal Data/Data Retention?

We retain your personal data where necessary in order to fulfil the purpose(s) for which we collected it, including any legal or accounting obligations. For example, we are legally obliged to keep the personal data pertaining to a financial donation for seven years after the date of the donation and to share those details with HMRC if the donation is gift-aided.

Your Legal Rights

Under UK GDPR and other applicable data protection laws, you have specific rights in relation to your personal data as follows:

1. **The right to be informed:** you should be given clear information regarding what personal data we receive, why we keep it, and how it is used and stored.
2. **The right of access:** you can request a copy of all your personal data and speak to us to make sure we process your data legally.
3. **The right to rectification:** if the personal data you have shared with us is incorrect or insufficient, you can notify us so that we can ensure that your information is accurate.
4. **The right to erasure:** you can ask us to erase your personal information. On some occasions, we may have a legal obligation or legitimate interest to hold your data, even if you no longer



require us to, such as the processing of Financial data or keeping records in case of a future claim.

5. **The right to restrict processing:** you can request for us to use your data for specific purposes only, such as receiving certain types of information from us.
6. **The right to data portability:** you can ask for your data to be transferred to another system. This is not something currently relevant to Nisaba, but an example may be a price comparison website to compare products or services.
7. **The right to object:** if you are unhappy with the way we have processed your data, you can contact us at info@nisaba.org.uk and we must respond.
8. **Rights in relation to automated decision making and profiling:** we need to tell you if we use any systems which automatically use your personal data without human involvement.

If you wish to exercise any of these rights, please contact info@nisaba.org.uk.

Accessing your Personal Data

We may request specific information from you to confirm your identity and ensure we comply with security measures to protect your personal information.

There is no fee required to access your personal data or to exercise any of the other rights. However, we may charge a reasonable fee if your request appears repetitive, excessive or unfounded. In this case, we may refuse your request to access personal data in these circumstances.

We respond to requests within one month of receipt. However, if the request is complex we may need longer, in which case we will notify you and keep you updated where possible.

Complaints

If you have any complaints about how we handle your personal data, please contact us at info@nisaba.org.uk and we will do our best to assist you. You also have a right to make a complaint to the supervisory authority in your country of residence or employment or place of the alleged infringement. The Information Commissioner's Office is the UK supervisory authority for data protection issues.