

## Against All Odds Still Standing - Privacy Policy

Last updated: 20<sup>th</sup> April 2021

### Introduction

Against All Odds Still Standing (“we”, “our”, “us”) are committed to protecting and respecting your privacy. We are a private limited company established in England and Wales with a registered office at 18 Tudor Close, Dartford, Kent, DA1 3HU, registration number 8672262 and a registered charity in England and Wales with charity number 1182219, and for the purpose of the General Data Protection Regulation (the “GDPR”), we are the data controller.

This policy sets out the basis on which we will process any personal data we collect from you, or that you provide to us, in connection with your use of [www.aosuk.org](http://www.aosuk.org) (the “Website”) as well as when you apply to volunteer or work for us. Please read this policy carefully so that you understand your rights in relation to your personal data, and how we will collect, use, and process your personal data. If you do not agree with this Privacy Policy in general or any part of it, you should not access the Website.

### What types of information do we collect and how do we use it?

- **Information we collect from potential volunteers/employees.** We collect your name, contact details (for example, we collect your mobile/landline telephone number, email address and postal address) and any details included on your CV, application form or in messages you send to us. Where you apply for certain positions, we also check whether you have any existing criminal convictions undertake DBS and enhanced checks if you are successful as an applicant.
- **Information we collect when you buy something from our website, donate to us or become a sponsor or funding partner or join as a member.** We collect the information you provide to us including your name, contact details, the content of any specific request you make and whether you would like to Gift Aid your donation. Where you make a payment through our Website, we will also pass you through to PayPal, Kindlink, or GoFundMe, who will process your payment details on our behalf.
- **Information we collect from stakeholders and beneficiaries.**
  - From subscribing to us, or from members, whether existing or potential, we will collect your name, contact number, address and, where required to fulfil your membership subscription, your bank details, by optionally uploading via the website, which once submitted is then sent internally by email to alert us with the attached document.
  - From participants, contributors, or speakers at our events, we will collect your name and contact details, and may request a bio or profile.
  - From individuals self-referring to use our services, we will collect your name, contact details and any other information that enables us to provide you with the appropriate services.

**Information we collect from Website guests and enquirers.** We may collect information such as your name, email address, phone number, your website details, and details of your organization if you contact us via our Website (including by email, phone, WhatsApp or other social media). We also collect your email address when you sign up for our newsletters or alerts.

In addition, when you visit the Website, we automatically collect the information sent to us by your computer, mobile phone or other device. This information includes:

- your IP address;
- device information including, but not limited to, device identifier, the name of your device and the type of operating system;
- mobile network information; and
- web information, such as your browser type and the pages you access on our Website.

### **How do we use your personal data?**

- **When you apply to volunteer/work for us:**

When you apply to volunteer or work for us, we use your personal data to:

- where it is in our legitimate interests to do so, assess your application and communicate with you as well as, if successful, arrange for you to attend an interview;
- where we wish to offer you the position:
  - verify your references and qualifications, and check that you have no prior criminal convictions where we must do so in order to prevent or detect unlawful acts or comply with regulatory requirements including principles of good industry practice;
  - create an employment/volunteering record and set you up on our systems as this is necessary for the purposes of our contract with you;
  - to the extent permitted or required by applicable law, conduct employment and diversity monitoring;

- **When you sponsor, donate to or buy from us:**

When you sponsor, donate to or buy from us, we use your personal data to:

- process your sponsorship, donation or purchase in order to ensure that we can fulfil our contract with you including providing you with a receipt of your sponsorship/donation/purchase;
- if you have opted into marketing, communicate with you about products, services, promotions, events and other news and information we think will be of interest to you through our newsletters and alerts.

- **If you are a stakeholder or beneficiary:**

If you are a stakeholder or a beneficiary of our services and you contact us via the website using the contact form, we use your personal data (including your name, email address and any other personal information you provide via the contact form) to:

- provide our services to you e.g. if you are a survivor or victim wishing to work with us or receive protection and/or access to specialist support services (such as one-to-one sessions, group sessions, role play sessions, skills for life workshops, peer support, social trips and other resources);
- refer you to third parties (such as charitable operations that provide services including refuge, education, female health support) where you wish to receive such services;
- communicate with you;
- create a personal record for you.

We do this where it is necessary to provide you with our services, where it is in your vital interests, where we have your consent (or explicit consent) or where it is in our legitimate interests to do so. We also process your personal data in the course of our legitimate activities with appropriate safeguards in place.

- **When you visit our Website:**

As it is in our legitimate interests to be responsive to you and to ensure the proper functioning of our services and organisation, we will use your information to:

- communicate with you, for example, if you contact us using Whatsapp or otherwise via the Website;
- organise and enable you to attend our events;
- [if you have opted into marketing, communicate with you about products, services, promotions, events and other news and information we think will be of interest to you through our newsletters and alerts.]

As it is in our legitimate interests to process your data to provide effective services to you we collect this information in order to:

- monitor and analyse trends, usage and activity in connection with our Website and services to improve the Website;
- administer the Website, and for internal operations, in order to conduct troubleshooting, data analysis, testing, research, statistical and survey analysis;
- keep the Website safe and secure; and
- measure and understand the effectiveness of the content we serve to you and others.

We may also process your personal data in order to comply with our legal or regulatory obligations.

### **Do we use cookies?**

We use cookies to collect information about your browsing activities over time and across different websites following your use of our services. Cookies are small text files that uniquely identify your browser or device. The cookie file is stored on your browser. When you return to that website (or visit websites that use the same

cookies) these websites recognize the cookies and your browsing device. This helps us to improve the services we provide to you and the way the Website works.

Cookies do many different jobs, like letting you navigate between pages efficiently, remembering your preferences, and generally improving the user experience. Cookies can tell us, for example, whether you have visited the Website before or whether you are a new visitor. They can also help to ensure that adverts you see online are more relevant to you and your interests.

There are different categories of cookies, including:

- **First-party cookies**

First party cookies, which are served directly by us to your computer or device.

- **Third-party Cookies**

Third-party cookies, which are served by a third party on our behalf. We use third party cookies for [functionality], [performance/analytics], [advertising] and [social media purposes.]

Cookies can remain on your computer or mobile device for different periods of time. Some cookies are 'session cookies', meaning that they exist only while your browser is open. These are deleted automatically once you close your browser. Other cookies are 'permanent cookies', meaning that they survive after your browser is closed. They can be used by the Website to recognise your computer when you open your browser and browse the Internet again.

**Essential Website cookies:** These cookies are essential to provide you with the Website and any services available through this Website and to use some of its features, such as access to secure areas. Without these cookies services you have asked for, like transactional pages and secure login accounts would not be possible.

**[Functionality cookies:** Functionality cookies record information about choices you have made and allow us to tailor the Website to you. These cookies mean that when you continue to use or come back to the Website, we can provide you with our services as you have asked for them to be provided.]

**Performance cookies:** We use performance/analytics cookies to analyze how the Website is accessed, used, or is performing in order to provide you with a better user experience and to maintain, operate and continually improve the Website.

We use Google Analytics, which is a web analytics tool that helps us understand how users engage with the Website. Like many services, Google Analytics uses first-party cookies to track user interactions, as in our case, where they are used to collect information about how users use our site. This information is used to compile reports and to help us improve our Website. The reports disclose website trends without identifying individual visitors. For more information on Google Analytics, see [here](#). You can opt out of Google Analytics without affecting how you visit our site – for more information on opting out of being tracked by Google Analytics across all websites you use, visit this Google page: <https://tools.google.com/dlpage/gaoptout>.

**Advertising and Targeting cookies:** As you use our Website, you will notice that it features advertising. We allow third party companies, including advertising companies, to place cookies on our Website. These cookies enable such companies to track your activity across various sites where they display ads and record your activities so they can show ads that they consider relevant to you as you browse the Internet. Cookies also allow us and third parties to know whether you have seen an ad or a type of ad, and how long it has been since you've last seen it.

This information is used for frequency capping purposes, to help tailor the ads you see, and to measure the effectiveness of ads.

We use cookies on this site to make sure you can use the site easily and enjoy the site. Some of these cookies are essential and we can't provide our service without them, but there are others that can be turned off. You have the right to choose whether or not to accept these optional cookies and similar technologies. However, please note that if you choose to refuse cookies or other essential locally stored data you may not be able to use the full functionality of our Website.

You can change your preferences by changing the settings in your browser. Most browsers will allow you to choose the level of privacy settings you want. This lets you control your cookie settings so that you can:

- See what cookies or other locally stored data you've got and delete them on an individual basis;
- Block third party cookies or similar technology;
- Block cookies or similar technology from particular sites;
- Block all cookies or similar technologies from being set; or
- Delete all cookies or similar technologies when you close your browser.

You can find more information about cookies and how to manage them at <http://www.allaboutcookies.org/>.

### Cookies we use

Cookie	First or third party	Category	Purpose	Duration
cookielawinfo-checkbox-necessary	First party	Necessary	Determines whether the user has accepted the cookie consent box.	1 day
cookielawinfo-checkbox-non-necessary	First party	Necessary	Determines whether the user has accepted the cookie consent box.	1 day
_ga	First party	Statistics	Registers a unique ID that is used to generate statistical data on how the visitor uses the website.	2 years
_gat	First party	Statistics	Used by Google Analytics to	1 day

			throttle request rate	
_gid	First party	Statistics	Registers a unique ID that is used to generate statistical data on how the visitor uses the website.	1 day
_fb_chat_plugin	First party	Marketing	Used to track the user's interaction with the website's Facebook chat-widget.	Session
_gads	First party	Marketing	Used to register what ads have been displayed to the user.	1 year
ads/ga-audiences	Third party	Marketing	Used by Google AdWords to re-engage visitors that are likely to convert to customers based on the visitor's online behaviour across websites.	Session
common/cavalry_endpoint.php	Third party	Marketing	Collects data on visitor behaviour from multiple websites, in order to present more relevant advertisement – this also allows the website to limit the number of times that they are shown in the	Session

			same advertisement.	
gadsTest	First party	Marketing	Sets a unique ID for the visitor, that allows third party advertisers to target the visitor with relevant advertisement. This pairing service is provided by third party advertisement hubs, which facilitates real-time bidding for advertisers.	Session
goog_pem_mod	First party	Marketing	Used to send data to Google Analytics about the visitor's device and behaviour. Tracks the visitor across devices and marketing channels.	Session
GoogleAdServingTest	First party	Marketing	Used to register what ads have been displayed to the user.	Session
IDE	Third party	Marketing	Used by Google DoubleClick to register and report the website user's actions after viewing or clicking one of the advertiser's ads with the purpose of measuring the efficacy of an ad and to	1 year

			present targeted ads to the user.	
messaging_plugin_http://aosuk.org/_244584995676436	Third party	Marketing	Used to track the user's interaction with the website's Facebook messaging-widget	Session
test_cookie	Third party	Marketing	Used to check if the user's browser supports cookies	1 day
VISITOR_INFO1_LIVE	Third party	Marketing	Tries to estimate the user's bandwidth on pages with integrated YouTube videos.	179 days
YSC	Third party	Marketing	Registers a unique ID to keep statistics of what videos from YouTube the user has seen.	Session
yt.innertube::nextId	Third party	Marketing	Registers a unique ID to keep statistics of what videos from YouTube the user has seen.	Session
yt.innertube::requests	Third party	Marketing	Registers a unique ID to keep statistics of what videos from YouTube the user has seen.	Session
yt-remote-cast-installed	Third party	Marketing	Stores the user's video player preferences	Session



			using embedded YouTube video	
yt-remote-connected-devices	Third party	Marketing	Stores the user's video player preferences using embedded YouTube video	Session
yt-remote-device-id	Third party	Marketing	Stores the user's video player preferences using embedded YouTube video.	Session
yt-remote-fast-check-period	Third party	Marketing	Stores the user's video player preferences using embedded YouTube video.	Session
yt-remote-session-app	Third party	Marketing	Stores the user's video player preferences using embedded YouTube video.	Session
yt-remote-session-name	Third party	Marketing	Stores the user's video player preferences using embedded YouTube video.	Session
.openx.net	Third party	Marketing	Unclassified cookies are cookies that we are in the process of classifying, together with the providers	1 Year

			of individual cookies.	
.quantserve.com	Third party	Marketing	Unclassified cookies are cookies that we are in the process of classifying, together with the providers of individual cookies.	3 months
.agkn.com	Third party	Marketing	Unclassified cookies are cookies that we are in the process of classifying, together with the providers of individual cookies.	1 year
.adform.net	Third party	Marketing	Unclassified cookies are cookies that we are in the process of classifying, together with the providers of individual cookies.	1 month
.bidswitch.net	Third party	Marketing	Unclassified cookies are cookies that we are in the process of classifying, together with the providers of individual cookies.	1 year
ads.programattik.com	Third party	Marketing	Unclassified cookies are cookies that we are in the process of classifying, together with the providers	2 years

			of individual cookies.	
--	--	--	------------------------	--

### How do we share your personal data?

We do not sell, rent or lease your personal information to others except as described in this Privacy Policy. We share your information with selected recipients. These categories of recipients include:

- cloud storage providers such as Microsoft (who may store or process your personal data outside the EEA, including in the US), to store the personal data you provide and for disaster recovery services;
- our affiliates located outside the EEA, for example, with Against All Odds Still Standing (Malawi);
- advertising and analytics service providers such as Google Analytics (who help us run analysis on our web page to ensure we provide it to you in the optimum way) and Google Ads (who help us carry out targeted advertising); and
- service providers who help us with various aspects of running our website such as PayPal (to assist with processing payments), Mailchimp (who enable us to communicate with you), HubSpot (who help us with marketing and customer service) and Microsoft who provide us with a range of services.

We will share your information with law enforcement agencies, public authorities or other organisations if legally required to do so, or based on our legitimate business interest if such use is reasonably necessary to:

- comply with a legal obligation, process or request;
- enforce our terms and conditions and other agreements, including investigation of any potential violation thereof;
- detect, prevent or otherwise address security, fraud or technical issues; or
- protect the rights, property or safety of us, our users, a third party or the public as required or permitted by law (exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction).

We will disclose your information to third parties in our legitimate business interests in the event that we:

- sell, buy, transfer, merge, consolidate or re-organise any part(s) of our business, or merge with, acquire, or are acquired by, or form a joint venture or partner with, any other business, in which case we may disclose your data to any prospective buyer, new owner, or other third party involved in such change to our business; or
- sell, buy, or transfer any business or assets (whether as a result of liquidation, bankruptcy or otherwise), in which case we will disclose your data to the prospective seller or buyer of such business or assets.

### Where do we store your personal data?

The information that we collect from you will be transferred to and stored at/processed outside the EEA including in the UK and the USA. We will take all steps reasonably necessary to ensure that your personal data is treated securely and in accordance with this policy. The personal data that we collect from you will be transferred to, and stored at/processed under the Commission's model contracts for the transfer of personal data to third countries

(i.e., the standard contractual clauses), pursuant to Decision 2010/87/EU. To request a copy of these model clauses, please contact: [admin@aosuk.org](mailto:admin@aosuk.org).

### **The security of your personal data**

Unfortunately, the transmission of information via the internet or email is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your information transmitted through the Website or over email; any transmission is at your own risk. Once we have received your information, we will take appropriate technical and organisational measures to safeguard your personal data against loss, theft and unauthorised use, access or modification.

We will, from time to time, host links to and from the websites of our affiliates or third parties. If you follow a link to any of these websites, these websites will have their own privacy policies and we do not accept any responsibility or liability for these policies. Please check these policies before you submit any information to those websites.

### **How long do we store your personal data?**

We retain your personal data as long as is necessary to provide you with the relevant services and fulfil the purposes for which we collected it. For example, we will retain your information as follows:

- where you have opted in to receive information from us, we keep your information for up to 12 months; and
- where you are a donor, we keep your information for the duration of the period in which you donate to us and thereafter, for a statutory period of 6 years.

Please note that we may retain your personal data for a longer period if legally required, for example, due to a court order or as needed to defend or pursue legal claims.

### **Your rights**

You have the right, in certain circumstances, to ask us for a copy of your personal data or to correct, delete or restrict (stop any active) processing of your personal data.

In addition, you can object to the processing of your personal data in some circumstances (in particular, where we are not required to process your data to meet a contractual or other legal requirement). These rights may be limited, for example if fulfilling your request would reveal personal data about another person, or if you ask us to delete information which we are required by law to retain or have compelling legitimate interests in retaining.

To exercise any of these rights, please contact [admin@aosuk.org](mailto:admin@aosuk.org). In addition, you have the right to complain to your applicable data protection supervisory authority.

### **Objection to Marketing**

At any time you have the right to object to our processing of data about you in order to send you marketing, including where we build profiles for such purposes, and we will stop processing the data for that purpose.

### **Complaints**

In the event that you wish to make a complaint about how we process your personal data, please contact us in the first instance at [admin@aosuk.org](mailto:admin@aosuk.org) and we will endeavour to deal with your request as soon as possible. This is without prejudice to your right to launch a claim with the Information Commissioner's Office or the data

protection supervisory authority in the EU country in which you live or work where you think we have infringed data protection laws.

### **Changes**

Any changes we will make to this policy in the future will be posted on this page. Please check back frequently to see any updates or changes to this policy.

### **Contact**

Questions, comments, and requests regarding this policy are welcomed and should be addressed to [admin@aosuk.org](mailto:admin@aosuk.org).