



Sri Lanka Campaign for Peace and Justice

PRIVACY NOTICE (last updated May 2018)

The Sri Lanka Campaign for Peace and Justice (SLC) is committed to protecting and respecting your privacy. This Privacy Notice explains the types of personal information we collect, how we use that information, who we share it with and how we protect that information.

Please read the following carefully to understand our views and practices regarding your personal information, and how we will treat it.

1. Who we are

For the purposes of applicable data protection laws, the data controller is Sri Lanka Campaign, Grayston Centre, 28 Charles Sq, London, N1 6HT, registered company number 07285160. Please see below for our contact details.

2. Information covered by this Privacy Notice

This Privacy Notice covers all personal information collected and used by the SLC. "Personal data" or "personal information" means information that (either in isolation or in combination with other information held by us) enables you to be identified as an individual or recognised directly or indirectly. This includes the types of information set out below.

3. What information do we collect from or about you?

We may collect information about you from the following sources:

3.1 Information we receive from you:

We may collect personal information (such as your name, postal address, date of birth, bank details, preferred ways for us to contact you, and email address) that you provide to us when you:

- support our work;
- request to receive updates or communications from us;
- provide your contact details to SLC staff
- engage with us on social media;
- contact us with a query;

3.2 Information we collect about you:

When you visit our website we automatically collect the following technical information:

- Technical information, including your IP address, browser type and version, device identifier, location and time zone setting, browser plug-in types and versions, operating system and platform, page response times, and download errors;

- Information about your visit, including the websites you visit before and after our website;
- Length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouseovers) and methods used to browse away from the page.

4. How do we use your personal information?

We use your personal information:	How do we use personal information for this purpose?	What is the legal basis for us processing your information in this way?
To inform you about our work through the supporter mailing list, including information about campaigns, news and appeals.	We will process personal information such as your contact details to inform you about our work.	We will only process your information for the purpose of informing you about our work with your consent. You can unsubscribe at any time.
To receive donations from you.	We will process personal information such as your name, email, postal address and bank details in order to receive and acknowledge donations you make to SLC.	It is necessary for our legitimate interest ¹ to use your personal information to receive donations from you, such interest being that we would be unable to effectively pursue our human rights objectives without your financial support.
	We will process personal information such as your name, email and postal address when we share it with third parties for the purpose of external financial auditing and the filing of company accounts.	It is necessary for complying with a legal obligation to process your personal information in this way. Personal information will only ever be shared on a confidential basis with contracted chartered accountants and will not appear in company accounts filings.
Maintaining internal records about staff and volunteers.	We will process personal information such as your contact details to communicate with staff and volunteers.	It is necessary for our legitimate interest to use personal information to maintain internal records about staff and volunteers, such interest being that we would be unable to effectively pursue our human rights objectives without communicating with such individuals.

¹ Where legitimate interest is cited as the relevant legal basis for processing data, that legitimate interest will only be relied on insofar as it is not overridden by the interests of the individual, subject to the 'three part test' laid down by the Information Commissioner's Office (<https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/lawful-basis-for-processing/legitimate-interests/>)

Keeping internal records about government, media and non-governmental organisation (NGO) contacts.	We will process personal information such as names, emails and affiliation to communicate with government, media and NGO contacts (i.e. our 'business to business contacts')	It is necessary for our legitimate interest to use personal information to communicate with government, media and NGO contacts, such interest being that we would be unable to effectively pursue our human rights objectives without communicating with such contacts.
To analyse use of the SLC website by visitors.	We collect technical information, such as your IP address, operating system and platform when you visit the website.	It is necessary for our legitimate interest to monitor use of the SLC website, such interest being that the effective pursuit of our human rights objectives necessitates gaining insights into how visitors to the site engage with various types of content.

5. Who may use your personal information?

Your personal information intended for SLC will be shared with third parties in certain circumstances. These include:

5.1 Our service providers:

We use other companies' agents or contractors ("service providers") to perform services on our behalf to assist with administering the organisation and pursuing our human rights objectives. These include (i) *Mailman*, our email distribution service; (ii) *PayPal*, an online payments processing service; and (iii) *SmartDebit*, an online direct debit processing service.

In the course of providing such services, these service providers may have some access to your personal information. However, we will only provide information to our service providers to the extent that is necessary for the performance of the services, and we ask service providers not to use your information for any other purpose. We will endeavour to ensure that all the service providers we work with will keep your personal information secure.

Additionally, we may share personal information about donors with third parties for the purpose of external financial auditing and the filing of company accounts. Such information will only ever be shared on a confidential basis with contracted chartered accountants and will not appear in company accounts filings.

5.2 Third parties permitted or required by law

In certain circumstances, we may be required to disclose or share your personal information in order to comply with a legal or regulatory obligation. For example, we may be required to disclose personal information to the police, regulatory bodies, or judicial or administrative authorities).

We may also disclose your personal information to third parties where disclosure is both legally permissible and necessary to protect or defend our legal rights (including our rights under contract),

or protect your rights or those of the public. Any personal information held by us and any third party will be treated as confidential. We will not sell your personal information to third parties

6. Where we store your personal information

The personal data that we collect from you may be transferred to, and stored at, a destination outside the European Union and/or European Economic Area ("EEA") (for example, in the USA). It may also be processed by staff operating outside the EEA who work for us or for one of our Service Providers.

7. Your rights (people in the EEA only)

If you are in the European Economic Area, you have certain rights under data protection laws. In order to exercise any of these rights, please contact us at the contact details set out under section 8 of this Notice ("Contacting us").

Your right to access the information we hold about you

You can request access to the information we are processing about you. For your own privacy and security, in our discretion we may require you to prove your identity before providing the requested information. If you require multiple copies of your personal data, we may in exceptional circumstances charge a reasonable administration fee.

Your right to have your information corrected

You have the right to have incomplete or inaccurate personal information that we process about you rectified.

Your right to have your personal information deleted

You have the right to request that we delete personal information that we process about you. However, we are not obligated to do so in situations where we would need to retain such data in order to comply with a legal obligation or to establish, exercise or defend legal claims.

Your right to restrict our processing of your personal information

You have the right to restrict our processing of your personal information where you believe such data to be inaccurate, our processing is unlawful or that we no longer need to process such data for a particular purpose, but where we are not able to delete the data due to a legal or other obligation or because you do not wish for us to delete it.

Your right to object to us processing your personal information

Where the legal justification for our processing of your personal information is our legitimate interest, you have the right to object to such processing on grounds relating to your particular situation. We will abide by your request unless we have compelling legitimate grounds for the processing which override your interests and rights, or if we need to continue to process the data for the establishment, exercise or defence of a legal claim.

Your right to have your personal information transmitted to another organisation

You have the right to obtain personal information we hold about you, in a structured, electronic format, and to transmit such data to another data controller, where this is (a) personal information which you have provided to us, and (b) if we are processing that data on the basis of your consent or to perform a contract with you (such as to process a donation from you).

You have the right to withdraw your consent

If you have consented to our processing of your personal information, you have the right to withdraw your consent at any time, free of charge. This includes cases where you wish to opt out from communications that you receive from us or change your preferences.

Making a complaint

We would be happy to address any concerns you have directly. Should you have a need to escalate your complaint, you have the right to lodge a complaint with a local data protection authority in the EEA if you believe that we have not complied with applicable data protection laws.

The address for the UK data protection authority is as follows:

Information Commissioner's Office
Wycliffe House
Water Lane, Wilmslow
Cheshire, SK9 5AF
Tel: +44 1625 545 745
E-mail: international.team@ico.org.uk
Website: <https://ico.org.uk>

8. Contacting us

If you have any questions or concerns about how we treat your personal information or you wish to exercise any of the rights set out in section 7 ("Your Rights") above, please contact us at info@srilankacampaign.org, call us on 020 7324 4677, or write to us at:

Sri Lanka Campaign,
Grayston Centre
28 Charles Sq,
London,
N1 6HT

9. How long do we keep your personal information?

Your personal Information is stored by us and/or our service providers, strictly to the extent necessary for the performance of our obligations and strictly for the time necessary to achieve the purposes for which the information is collected, in accordance with applicable data protection laws. When we no longer need to use your information, we will remove it from our systems and records and/or take steps to properly anonymise it so that you can no longer be identified from it (unless we need to keep your information to comply with legal or regulatory obligations to which we are subject). For further information, please contact us using the methods set out above.

10. How do we keep your personal information secure?

Any personal information which is collected from the date this Privacy Notice comes into force will be collected via secure servers. Where possible, data is encrypted, and two-factor authentication is used. SLC's website server is hosted by a UK-based company that imposes a strict security regime.

Historically, your personal information may have been collected in hard copy and any such information is held securely with appropriate security restrictions, preventing damage, and unauthorised access to your personal information.

11. Changes to this Privacy Notice

We may update this Privacy Notice from time to time in response to changing legal, regulatory or operational requirements. We will notify you of any such changes (including when they will take effect) by posting an alert on the homepage of our website.