

# **SURVIVOR ALLIANCE GDPR PRIVACY POLICY**

Updated 24 June 2021

## **Background**

Survivor Alliance and its partners understand your privacy is important to you and that you care about how your personal data is used. We respect and value the privacy of all individuals and organizations that collaborate with us. We will only collect and use personal data in ways that are described here, and in a way that is consistent with our obligations and your rights under the law.

### **1. Information about us**

Organisation name: Survivor Alliance

Business Type: Non-for-profit organization

Address: c/o Minh Dang, 156 Great Charles Street, Queensway, Office 413; Birmingham, B3 3HN, United Kingdom

Website Address: [www.survivoralliance.org](http://www.survivoralliance.org)

Telephone contact: Executive Director +44 (0)121809 6410 or +44(0)79489 03303

Email Address: [minh@survivoralliance.org](mailto:minh@survivoralliance.org)

Data Protection Officer: Minh Dang

### **2. What does this notice cover?**

The Privacy Information explains how we use your personal data, how it is collected, how it is held and how it is processed. It also explains your rights under the law relating to your personal data.

### **3. What is Personal Data?**

Personal data is defined by the General Data Protection Regulation (EU Regulation 2016/679) (the "GDPR") as 'any information relating to an identifiable persona who can be directly or indirectly identified in particular by reference to an identifier'.

Personal data is, in simpler terms, any information about you that enables you to be identified. Personal data covers obvious information such as your name and contact details, but also covers less obvious information such as identification numbers, electronic location data and other online identifiers such as pictures.

The personal data that we use is set out in Part 5 below.

### **4. What are my rights?**

Under the GDPR, you have the following rights, which we will always work to uphold.

- The right to be informed about our collection and use of your personal data. This Privacy Notice should tell you everything you need to know, but you can

always contact us to find out more or to ask any questions using the details in Part 11.

- The right to access the personal data we hold about you. Part 10 will tell you how to do this.
- The right to have your personal data rectified if any of your personal data held by us is inaccurate or incomplete. Please contact us using the details in Part 11 to find out more.
- The right to be forgotten, ie, the right to ask us to delete or otherwise dispose of any of your personal data that we have. Please contact us using the details in Part 11 to find out more.
- The right to restrict (ie, prevent) the processing of your personal data.
- The right to object to us using your personal data for a particular purpose or purposes.
- The right to data portability. This means that, if you have provided personal data to us directly, we are using it with consent or for the performance of a contract, and that data is processed using automated means, you can ask us for a copy of that personal data to re-use with another service or business in many cases.
- Rights relating to automated decision making and profiling. Part 6 explains more about how we use your personal data, including profiling.

For more information about our use of your personal data or exercising your rights as outlined above, please contact us using the details provided in Part 11.

Further information about your rights can also be obtained from the Information Commissioner's Office or your local Citizens Advice Bureau.

If you have any cause for complaint about our use of your personal data, you have the right to lodge a complaint with the Information Commissioner's Office.

## **5. What Personal Data do we collect? (not every piece of data applies to each individual)**

- Name
- Email Address
- Telephone Number
- Business or Organisation Name
- Job Title
- Profession
- Support request information - For example, if someone has requested childcare or buildings without stairs
- Bank Payment Information
- Address
- Pictures
- Status as a survivor of modern slavery

Additional data may be collected when participants have consented to provide additional information.

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

Under the GDPR, we must always have a lawful basis for using personal data. This may be because the data is necessary for our performance of a contract with you, because you have consented to our use of your personal data, or because it is in our legitimate organisation's interest to use it. Your personal data may be used for one of the following purposes.

- Communicating with you
- Invoicing
- Sending Receipts
- Asking for Volunteers
- Annual Report and Accounts Construction
- Funding applications
- Evaluation reports of events

You will not be sent any unlawful marketing or spam. We will always work to fully protect your rights and comply with our obligations under the GDPR and you will have the opportunity to opt out.

## **7. How long will you keep my personal data?**

We will not keep your personal data for any longer than necessary, so this may vary according to our requirements. We would certainly want to keep pictures as an archive for future use, it is unlikely these would be deleted, unless you request it, which you may request as laid out per Section 11.

## **8. How do we store/transfer personal data?**

We store your information on a private Google Drive site. This Drive is only accessible to those who have a @survivoralliance.org email. This Drive is also divided into multiple sections:

1. Volunteers/Interns/Placement Students: This drive has limited personal information listed here. Survivors LEAD Program has names and emails of students listed here. SA Members who are Fellows or Student Tutors have access to this Drive. All SA Staff also have access to this Drive.
2. SA Staff and Consultants: This Drive contains the most personal data on any one individual. Employees and program sub-contractors can access this drive. As of July 2021 this includes:
  - Minh Dang - Executive Director
  - Morgan Moeller - Deputy Director
  - Maria Lozano - SA Academy Director
  - Nancy Esiovwa - Membership Coordinator
  - Tsend Badam - Finance and Operations Coordinator
  - Hannah Browne - Resources and Support Coordinator

Jane Williamson - Curriculum Developer on Survivors LEAD  
Sophie Otiende - Curriculum Developer on Survivors LEAD and  
sub-contractor for Allies Consulting Program  
Lara Powers - Sub-contractor for Freedom Fund and NHTTAC  
contracts

3. SA Senior Management : This Drive is only accessible to Directors and our Finance Coordinator. This drives holds Employee contracts, payroll documents, and SA legal documents.

We store and transfer data primarily in the U.S. and in the UK, however we have audiences worldwide. Your data will be fully protected under the GDPR in the U.K. and we will follow additional data protection guidelines as defined by other countries in which we operate.

## **9. Do we share your personal data?**

There may occasionally be a requirement to share information between partners and funders. This data is shared in aggregate and anonymously. This means your name and information will not be provided unless required.

## **10. How can you access your personal data?**

If you want to know what personal data we have about you, you can ask us for details of that personal data and for a copy of it (where any such personal data is held). This is known as a “subject access request”.

All subject access requests should be made in writing and sent to the email or postal addresses shown in Part 11. To make this as easy as possible for you, a subject access request form requires the following details: Name, address, email address, phone number, and any additional details related to your request. There would be a charge of £5 to cover time expended, postage and cost of materials, printing, etc.

We will respond as quickly as possible to your request, but this may take as long as a month.

## **11. How to contact us?**

To contact us about anything to do with your personal data and data protection, including to make a subject access request, please use the following details:

Address for subject access request:

Survivor Alliance c/o Minh Dang, 156 Great Charles Street, Queensway, Office 413;  
Birmingham, B3 3HN, United Kingdom

## **12. Changes to this privacy notice**

We may change this Privacy Notice from time to time, this may be necessary if the law changes, or our activities change. Updates will be available on the website at [www.survivoralliance.org](http://www.survivoralliance.org)

This policy is dated and valid from 30 July 2018.

This policy was updated 24 June 2021.