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## COMFORT INTERNATIONAL PRIVACY NOTICE

This Privacy Notice outlines Comfort International's **motivation**, **responsibility** and **actions** with regards to your personal information. It also contains information about your **rights** and the **actions you can take** regarding the personal information we hold on you. You can contact us:

**In writing:** Data Protection  
Comfort International  
14-15 Carron House  
Cumbernauld  
G67 1ER

**By email:** [enquiry@comfortinternational.org](mailto:enquiry@comfortinternational.org)

**By phone:** 01236 598 274

The term "data protection legislation" refers to:

- Data Protection Act 1998
- Privacy and Electronic Communications (EC Directive) Regulations 2003
- The General Data Protection Regulation (GDPR) (EU) 2016/679

### Our Motivation

Comfort International considers your personal information to be of the utmost importance. Not only do we regard it our legal responsibility to treat the personal information you entrust to us with care and respect, and in accordance with data protection legislation, but also our ethical and Christian responsibility.

To that end, it is our aim to have complete transparency and integrity in the way that we collect, process and store your personal data.

Any personal information that we have is used exclusively for the following purposes:



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#### **For you -**

- To keep you up-to-date on the work of the charity
- To keep you informed about your sponsorship programme
- To keep you in the loop regarding appeals and fundraising requests
- To allow you to pray for us, our partners and those we support

#### **For us -**

- To administer sponsorship programmes
- To process donations
- To reclaim Gift Aid, if applicable
- To fundraise

### **Our Responsibility**

We aim to respond, within 10 working days and without question, to any requests for:

- Access to the data we hold on you
- Deletion of the data we hold on you
- Any alteration to the way we process your data
- Any other reasonable or legal request regarding the personal data we hold on you

We will handle, process and store your personal information in accordance with data protection legislation.

Some personal information is considered in law to be “sensitive personal data”; this includes but is not limited to: race or ethnicity; religious beliefs or similar; political beliefs; sexual orientation; physical or mental health issues. We do not foresee any reason to collect sensitive personal data, however we promise to handle such data, if it is entrusted to us, with impartiality, confidentiality and in accordance with data protection legislation.

In order to carry out our vital work overseas, Comfort International works with a range of trusted and responsible partners. We will only share your personal information with our international partners when it is required to administer sponsorship or other projects, or when we have obtained your



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consent. We will only ever share the minimum information required to achieve this. We have written agreements with our international partners,

which obligate them to process your personal information only on our instruction and in accordance with relevant data protection and privacy laws.

We will never sell or otherwise distribute your information to external third party agencies. The only other organisations with whom we will share your personal information are our data processing partners.

The term “data processing partner” is used in the GDPR and refers to any external data storage platform. These are the services we use to store and manage all the data we hold.

Our data processing partners include:

Donation Manager/Total Giving (fundraising)  
Podio (data, content and workflow management)  
Dropbox (data storage)  
Xero (accounting and finance)

A full list of our data processing partners can be obtained by contacting us. All of our data processing partners are required to comply with data protection legislation and have provided written assurance of their compliance.

## **Our Actions**

Comfort International does not proactively or intentionally harvest personal data. If we have your personal information it is because you have expressed an interest in our work. If we have your information mistakenly or you no longer want us to store it, you can contact us and, as stated above, we aim to respond promptly and without question.

When you express an interest in our work and we obtain your personal data, we will collect:



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- Personal Identifiers (title, name and sometimes age - as this can determine how data is handled)
- Contact Details (address, phone number, email address)
- Financial Details (bank details - to process donations and sponsorship)
- Whether you are a UK tax payer (for Gift Aid purposes)
- Spouse, friend, family (if you are sponsoring jointly)
- Letters, gift etc to the individual you sponsor
- The church you attend (if applicable)

If it is applicable, we may also keep a record of any contact between us and you and any decisions we make regarding the handling, storage and processing of your personal information.

### Consent

In line with data protection legislation, we will only contact you with information regarding appeals and fundraising requests if you have given us your affirmative **Consent** to do so. This is our legal basis for handling, storing and processing your personal information with the purpose of fundraising.

We do not use profiling methods to target our fundraising and we do not use third party providers to supplement the personal information we hold on you.

### Legitimate Interests

Unless you have opted out of receiving all information from Comfort International (in which case we will unsubscribe you from our mailing lists, delete the data we are not required to keep by law and make a note that you do not wish to be contacted), we will still send you general information, like our newsletter, prayer requests and your sponsorship information, if applicable. We consider this to be in the **Legitimate Interest** of Comfort International. This is our legal basis for handling, storing and processing of your personal information with the purpose of keeping you up-to-date.

If you have given us your personal information and consent to be contacted for appeals and fundraising requests we will consider this to be on an ongoing basis until such time as you inform us that you no longer wish to be contacted in this manner.



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## Your rights & the actions you can take

Data protection legislation gives you the right to:

- Request in writing and obtain copies of the personal information Comfort International holds about you
- Correct or update any personal information we hold about you
- Request Comfort International to stop using your personal information for fundraising or any other purpose where there is no legal requirement for us to do so
- To choose whether or not to receive marketing communication from us by email, text or phone call

More information about your data protection and privacy rights can be obtained by visiting the Information Commissioner's Office website.

Please contact us if you want to make any changes to the personal information we hold on you, how we use it or if you want us to delete it. You can also contact us if you wish to raise a concern about Comfort International's handling of your personal information.

You also have the right to lodge a complaint with the Information Commissioner's Office about how we manage your data.

## Changes to the Privacy Notice

On an ongoing basis, Comfort International will review and if required by law and/or a change in policy alter the Privacy Notice.

Please check our website from time-to-time to ensure you are kept up-to-date. If there are major changes, we will inform you by email, our website and on social media.