



Privacy Policy - IDF Life for a Child (USA) inc.

Who we are

IDF Life for a Child (USA) inc. is an International Diabetes Federation program (LFAC), supported by Diabetes NSW & ACT.

LFAC's registered address is IDF Life for a Child (USA), PO Box 12903, Tallahassee, FL 32317, USA

This Privacy Policy relates to information which is obtained by LFAC and for which LFAC is the Data Controller.

LFAC's purpose

LFAC provides supplies, support, education and assistance to young people living with diabetes in less-resourced countries.

Our supporters help us to achieve this in a variety of ways, such as, fundraising, donating money and volunteering in order to support our programme of work.

We take active steps to make sure that our supporters are aware of the ways in which they can help us achieve our overall purpose.

Why we hold and process supporter's data

We hold and process supporters' personal data for a number of reasons:

- To keep a record of donations made and actions taken by our supporters and our communications with them
- To send our supporters thank yous, program updates, marketing information, fundraising activities and appeals where we have their consent or are otherwise allowed to
- To support volunteers, advocates and supporters participating in fundraising events
- To record actions by supporters
- To support community based fundraising and campaigning
- To claim matched donations by a third party
- To fulfil contractual obligations entered into with supporters e.g. online purchases
- To comply with legal obligations
- To manage our organisation
- To ensure we do not send unwanted information to supporters or members of the public who have informed us they do not wish to be contacted



These reasons are underpinned by a "legal basis" under GDPR. We outline in the next section what these are for our main activities.

Explaining the legal bases we rely on

The law on data protection sets out a number of different reasons for organisations to collect and process your personal data:

LFAC relies on the following legal bases in our marketing activities:

Consent

Wherever possible, we will ask for your consent to send you marketing information. We will do this through a clear statement of what you will receive and by offering you the option to be 'forgotten' and deleted from our database. You can do this by contacting us by email at lifeforachild@idf.org or by post IDF Life for a Child C/O Diabetes NSW & ACT, 26 Arundel St, Glebe Sydney 2010.

Legitimate interest

In specific situations, we process your data to pursue our legitimate interests in ways which might reasonably be expected and which do not materially impact your rights, freedom or interests. LFAC's use of legitimate interest includes the following:

Sending updates, marketing and information by post, to keep our supporters updated on LFAC's projects, fundraising activities and appeals. We will only do this where we have reason to believe that this information will be of interest. Supporters can opt out or be deleted from our database by contacting us by email at lifeforachild@idf.org or by post IDF Life for a Child C/O Diabetes NSW & ACT, 26 Arundel St, Glebe Sydney 2010

If you have made a donation or opted in to emails we may use your details to link to your account on Facebook or other social media site in order to serve you LFAC content.

We analyse your previous support of LFAC in order to offer relevant ways of supporting LFAC in the future.

For activities other than marketing, we may rely on different legal bases:

Legal compliance

If the law requires us to, we may need to collect and process your data. For instance under tax rules we are required to retain financial data for 7 years.

Contract or Memorandum of Understanding (MOU) compliance

If a contract or MOU requires us to, we may need to collect and process your data.

For example, where you make a donation to a fundraising campaign which will be matched by a third party, we will process your data for the purposes of submitting a matched claim.



Consent

We may ask for your consent for data - for instance where you volunteer with us or engage with a program and can give you a clear choice about what information you need to provide.

Legitimate Interest

In many situations we need data in order to carry out a task, such as formulate an assignment, run an event, administer our organisation etc.

Public Interest

In limited situations we may use data in the public interest. It is likely to be in the public interest to collect data to prevent crime or dishonesty, ensure that we are fair in our practices by carrying out equality and diversity monitoring, or safeguard the wellbeing of people with whom we work.

When and why we will send you personalised marketing communications

LFAC will only contact you for marketing purposes - for example keep you up to date on our work, or let you know of ways in which you can support that work- where we have your consent or we are otherwise allowed to do so.

We will make it easy for you to tell us if you would like to receive marketing communications from us and hear more about our work and the ways in which you would like to receive this information (post, email, SMS and phone). We will not send you marketing material if you tell us that you do not wish to receive it. You can tell us this by email at lifeforachild@idf.org or by post IDF Life for a Child C/O Diabetes NSW & ACT, 26 Arundel St, Glebe Sydney 2010

Where you give us your consent to send marketing information, we will continue to until you withdraw your consent. You can do this at any time, for individual channels of communication, or for all channels. We will generally treat any marketing consent you give us as ongoing consent.

Other circumstances in which you may receive marketing information from LFAC

"Legitimate Interest"

We may send you marketing communications by direct mail where you are a regular supporter and we have evidence that you do not object to receiving marketing material through the post.

"Soft opt in"

This allows organisations to send marketing communications by email and SMS to individuals who have previously purchased similar goods and services, provided they were given the opportunity to opt out at the time of purchase. In LFAC's case, this allows us to send marketing emails and SMS to previous donors. We will not use the "soft opt in" option if you have opted out of receiving email and/or SMS.



How and when we collect information about you

LFAC may collect your personal data in the following circumstances:

When you give it to us DIRECTLY

You may give us your personal data directly when you make a donation, sign up for our newsletter, volunteer, purchase a gift card or when you communicate with us or in person at an event or conference.

When you give it to us INDIRECTLY

You may give us your information indirectly when you contribute to LFAC via fundraising or crowdfunding sites like JustGiving or EverydayHero. These independent third parties will pass your data to LFAC where you have indicated that you wish to support LFAC and have given your consent or it is a necessary part of completing a contract with you.

Sometimes your personal data is collected by an organisation working on our behalf (for example a professional fundraising agency) but as they are acting on our behalf we are the "data controller" and responsible for the security and proper processing of that data.

When you access LFAC's Social Media

We might also obtain your personal data through your use of social media such as Facebook, Instagram, Twitter or LinkedIn, depending on your settings or the privacy policies of these social media and messaging services. To change your settings on these services, please refer to their privacy notices, which will tell you how to do this.

When the information is publicly available

We might also obtain personal data about individuals who may be interested in giving major gifts to charities or organisations like LFAC. In this scenario, LFAC may seek to find out more about these individuals, their interests and motivations for giving through publicly available information. LFAC will not retain publicly available data relating to major donors without their consent, which will be sought at the earliest practical opportunity. Where we decide not to make contact, we will delete all personal data obtained, other than basic contact details, to which we will apply a suppression flag to ensure we do not make contact in the future.

When we use cookies

Cookies are a useful way for us to understand how supporters use our website. When you visit our web site we will collect data from your computer or other device such as a smart phone or tablet through the use of "cookies". Cookies are created by your web browser when you visit our website. Every time you go back to the LFAC website, your browser will send the cookie file back to the website's server. They improve your experience of using our website, for example, by remembering your preference settings so that you are presented with information likely to be most relevant to you, and by measuring your use of the website to enable us to continuously improve our website to ensure that it meets your needs.



Cookies can also be used to show you relevant LFAC content on social media services such as Facebook - these are known as "retargeting" or "advertising" cookies.

If you visit our website as an anonymous visitor (e.g. you switch off cookies), LFAC may still collect certain information from your browser, such as the IP address (an IP address is a number that can uniquely identify a computer or other internet device).

The LFAC website contains hyperlinks to websites owned and operated by other organisations. These include research organisations and partners. These third party websites have their own privacy policies, including policies on their use of cookies, and we urge you to review them. They will govern the use of personal information you submit or which is collected by cookies whilst visiting these websites. We cannot accept any responsibility or liability for the privacy practices of such third party websites and your use of such websites is at your own risk.

What information might LFAC collect about you?

We only collect personal data relevant to the type of transactions or interaction you have with LFAC. Whatever your interaction with us this information will be minimal and linked to the purpose for which we need it.

For example, when you contact LFAC to make a donation, take a campaign action, or sign up to online content (such as newsletters) or you telephone, email, write to or text LFAC, or engage with LFAC via social media channels, we may receive and retain personal information.

In these cases we are likely to process details such as your name, email address, postal address, telephone or mobile number, bank account details to process donations.

If you participate in an event we may (with your permission) take your photograph or video, or interview you.

If you participate in market research, we may ask you questions regarding your experience with us, or other survey questions relating to your experience.

If you are an advocate or fundraiser we may collect information such as correspondence, details of your background and activities with us or relating to the issue, the events you attend, or how we would like to work with you.

Where we gather information about you which is publicly available - for instance as a major donor - this may include your name, contact details, views and positions you have expressed, and details regarding your circumstances- for instance which political roles you hold or what your background is.

Sensitive Personal Data



We only collect "sensitive personal data" e.g. health status or criminal record checks, about our volunteers, advocates and supporters where there is a clear and specific reason for doing so, such as volunteering at a partner centre or an event.

We collect this data where we need it to ensure that we provide appropriate facilities or support to enable you to participate in the event or carry out your role and to check that it is appropriate for you to undertake the role. If you apply for a role with us, we may collect this data for equality monitoring. Rarely, we may collect this data for the prevention of crime or dishonesty, to safeguard those with whom we work, or for another reason which is in the public interest. Where we do this we will do it carefully and in accordance with applicable laws.

Should you support LFAC in a substantial way, it may be appropriate for us to tailor our communications to suit your interests. If this is the case we may collect sensitive personal data where relevant to our relationship, such as your political or religious views. Should you disclose information to us about your health or your family, this may also be recorded, so that we can communicate with you in a considerate and appropriate manner.

All sensitive personal data is stored on a secure database, to which only a limited number of relevant staff have access. It is deleted when no longer relevant, is never shared with third parties, and is available to you at any point should you wish to see it.

How will LFAC use your personal data?

LFAC will use your personal information for the following purposes:

For administrative reasons, including:

- "service administration", which means that LFAC may contact you for reasons related to administering any donations you have made, the completion of commercial or other transactions you have entered into with LFAC or the activity or online content you have signed up for;
- to confirm receipt of donations (unless you have asked us not to do this), and to say thank you and provide details of how your donation might be used;
- in relation to correspondence you have entered into with us whether by letter, email, text, social media, message board or any other means, and to contact you about any content you provide;
- for internal record keeping so as to keep a record of your relationship with us;
- to provide logistical and fundraising information to people who are taking part in a fundraising event in aid of LFAC
- to communicate with LFAC volunteers - to support you in your designated role or administer that role and our organisation;
- to implement any instructions you give us with regard to withdrawing consent to send marketing information or informing us by email or mail;



- to use IP addresses to identify the location of users, to block disruptive use and to establish the number of visits from different countries;
- to protect our staff and those with whom we work, or to prevent crime and dishonesty. For marketing and fundraising reasons (see above 'When and why we will send you personalised marketing communications')
- For market research
- to invite you to participate in surveys or research about LFAC or our work (participation is always voluntary);
- to analyse and improve the activities and content offered by the LFAC website to provide you with the most user-friendly navigation experience. We may also use and disclose information in aggregate (so that no individuals are identified) for marketing and strategic development purposes.

Will LFAC share your personal information with anyone else?

We will only use your information within LFAC for the purposes for which it was obtained. LFAC will not, under any circumstances, share or sell your personal data with any third party for their own marketing purposes, and you will not receive marketing from any other companies, charities or other organisations as a result of giving your details to us.

LFAC's suppliers

We may need to share your information with service providers who help us to deliver our projects, fundraising activities and appeals, for instance through handling responses to our fundraising appeals. These "data processors" will only act under our instruction and are subject to pre-contract scrutiny and contractual obligations containing strict data protection clauses. We do not allow these organisations to use your data for their own purposes or disclose it to other third parties without our consent and we will take all reasonable care to ensure that they keep your data secure.

Facebook and other Social Media Sites

We may also use your email address and phone number to match to your account on Facebook or other social media sites in order to show you LFAC content while using these services. We only do this where you have opted in to marketing emails or phone calls and we keep your data secure by encrypting it. No data we hold about you is retained by the third party.

In addition, we may also use your email address and phone number to link to Facebook or other social media sites in order to identify other users of these sites whom we believe would be interested in LFAC, and we may then show them LFAC content. No data we hold about you is retained by the third party. There are two ways to prevent this use of your data, you can either update your preferences at LFAC by opting out of the relevant channel of communication or you can do this via the social media site:

Facebook: <https://www.facebook.com/help/568137493302217>

LinkedIn: <https://www.linkedin.com/help/linkedin/answer/62931>



Twitter: <https://business.twitter.com/en/help/troubleshooting/how-twitter-ads-work.html>

Updating your preferences with LFAC will not guarantee that you never see LFAC content on social media, since the social media site may select you based on other criteria and without your data having been provided by LFAC.

We will also comply with legal requests where disclosure is required or permitted by law (for example to government bodies, statutory bodies, or law enforcement agencies for tax purposes, where it is in the public interest, or the prevention and detection of crime, subject to appropriate protection in law). LFAC is likely to transfer your personal data outside the EEA. If it does so, this may occur under the protections of the European Commission's standard contractual clauses, but will otherwise only take place where appropriate standards and safeguards are in place.

How long will LFAC keep your personal information?

We will hold your personal information on our systems for as long as is necessary for the relevant activity, for example we will keep a record of donations for at least seven years to comply with tax and audit rules.

If you request that we stop sending you marketing materials we will keep a record of your contact details and appropriate information to enable us to comply with your request not to be contacted by us.

Legacy income is vital to the running of the charity. We may keep data you provide to us indefinitely, to carry out legacy administration and communicate effectively with the families of people leaving us legacies. This also enables us to identify and analyse the source of legacy income we receive.

Where you contribute material to us, e.g. user generated content or in response to a particular campaign, we will only keep your content for as long as is reasonably required for the purpose(s) for which it was submitted unless otherwise stated at the point of generation.

How to control what we send you or request we update your personal information?

Send LFAC a letter or email detailing your wish to update or remove your personal information at lifeforachild@idf.org or by post IDF Life for a Child C/O Diabetes NSW & ACT, 26 Arundel St, Glebe Sydney 2010

How LFAC keeps your data safe



We ensure that there are appropriate technical controls in place to protect your personal details. For example our network is protected and routinely monitored.

We undertake regular reviews of who has access to information that we hold to ensure that your information is only accessible by appropriately trained staff, volunteers and contractors.

We may use external companies to collect or process personal data on our behalf. We would implement comprehensive checks on these companies before working with them, and put a contract in place that sets out our expectations and requirements, especially regarding how they manage the personal data they collect on our behalf, or have access to.

These organisations - referred to as "Data Processors" also have legal liability for the way in which your data is used, providing you with additional protection.

Your rights over your personal data

You have a variety of rights in respect of your data, including the rights to see, update, restrict, object to the use of or withdraw use of your data. In particular, depending upon why we hold your data, you may have the right to request:

- Access to the personal data we hold about you, including how we first obtained your details, free of charge in most cases (this is known as a 'Subject Access Request').
- The correction of your personal data when incorrect, out of date or incomplete.
- That we stop using your personal data for direct marketing (either through specific channels, or all channels).
- That we delete your personal data from our systems (this is known as the "Right to be Forgotten").
- That we no longer process your data automatically to decide whether particular marketing activities are likely to be of interest, or suggest an appropriate donation level based on your previous donation history. This is known as profiling, and helps us to ensure that our marketing is relevant and appropriate.

You can contact us to request to exercise these rights at any time, see 'How to control what we send you or request we update your personal information' for details of how to get in touch.

You have the right to stop the use of your personal data for direct marketing activity through all channels, or selected channels. We will always comply with your request.

Where we are sending you direct marketing on the basis of our legitimate interest, you can also ask us to stop. In the case of postal marketing sent on this basis, we will always comply with your request to opt out. Similarly, where we send email marketing on a soft opt in basis, we will also comply with all requests to opt out.



Upon request we will delete your personal data from our systems, to the extent that we are permitted to by law or regulatory guidelines. For instance under tax and audit rules we are required to retain financial data for 7 years, and so will not be able to delete donation details until this time period has elapsed.

Upon request we will cease using your personal data to decide whether you would be interested in particular updates and other marketing. Such requests may lead to you not hearing from us in future.

You have the right to request a copy of the personal information we hold about you. We will provide this as soon as possible, and within a month unless there are specific reasons why this would not be possible. We will always let you know if this is likely to be the case.

To protect the confidentiality of your information, we will ask you to verify your identity before proceeding with any request you make under this Privacy Notice.

If you have authorised a third party to submit a request on your behalf, we will ask them to prove they have your permission to act.

How to find out more, or make a complaint about LFAC's approach to data protection

If you would like more information, to update your details or have any questions about this policy, please contact us by writing to lifeforachild@idf.org or by post IDF Life for a Child C/O Diabetes NSW & ACT, 26 Arundel St, Glebe Sydney 2010

Changes to LFAC's Privacy Policy

This Privacy Policy may be updated from time to time so you may wish to check it each time you submit personal information to LFAC. The date of the most recent revisions will appear on this page. If you do not agree to these changes, please do not continue to use the LFAC website to submit personal information to LFAC.



Cookies

How to control and delete cookies

Cookies are used to enable us to improve services for you through, for example:

- measuring how many people are using each page of the website and for how long so that we can try to improve the quality of our website
- enabling you to view content shared on other sites e.g. YouTube or Twitter

However, if you wish to restrict or block the cookies which are set by the LFAC website, or indeed any other website, you can do this through your browser settings. The Help function within your browser should tell you how.

Alternatively, you may wish to visit www.aboutcookies.org which contains comprehensive information on how to do this on a wide variety of browsers. You will also find details on how to delete cookies from your computer as well as more general information about cookies. For information on how to do this on the browser of your mobile phone you will need to refer to your handset manual.

Please be aware that restricting cookies may impact on the functionality of the LFAC website.

Google Analytics

The LFAC website uses Google Analytics, a web analytics service provided by Google, Inc. Google Analytics sets a cookie in order to evaluate your use of the website and compile reports for us on activity on the site.

Google stores the information collected by the cookie on servers in the United States of America. Google may also transfer this information to third parties where required to do so by law, or where such third parties process the information on Google's behalf. Google will not associate your IP address with any other data held by Google. By using the LFAC website, you consent to the processing of data about you by Google in the manner and for the purposes set out above.

How to reject or delete this cookie <https://www.google.com/intl/en/privacypolicy.html>

Cookies set by Third Party sites

To enrich our content, we sometimes embed photos and video content from websites such as YouTube and Flickr. As a result, when you visit a page with content embedded from, for example, YouTube or Flickr, these sites may set a cookie.