

**Friends of Murambinda Hospital
(Charity No. 1073978)**

**EU General Data Protection Regulation
Privacy Notice**

The General Data Protection Regulation, which takes effect on 25 May 2018, introduces new and more stringent requirements for charities and other bodies to be explicit about their retention of individuals' personal information and prevents them from holding or processing such information without lawful grounds. The Trustees of the Friends of Murambinda Hospital ("the Friends") have approved this privacy policy pursuant to the Friends' legal obligations under the Regulation and other relevant laws.

Undertaking of the Friends' trustees.

The Friends trustees believe that they have a legitimate interest in the holding, processing and sharing of the personal information of the supporters of and donors to the Friends in the manner set out in this policy in pursuance of the Friends' charitable purposes and in view of both its traditional governmental and administrative processes. This belief is informed by the Legitimate Interests Assessment undertaken on 13/5/18 (see Appendix). Such legitimate interests are recognised as lawful grounds for the holding and processing of data. The Friends' trustees undertake that the personal information of the supporters and donors will be held and processed only as is necessary for the purposes of the legitimate interests pursued by the Friends and in accordance with this policy.

Definitions of 'supporter(s)' and 'donor(s)'

The expression 'supporter(s)' or 'donor(s)' for this purpose includes those who have previously been recognised as supporters or donors. The expression 'personal information' in this regard includes: the supporter's or donor's name; any declared institutional affiliation; contact details including postal address or correspondence address if different; email address and telephone number; matters relating to the supporter's or donor's status, such as currency and donation date; and matters relating to their attendance at the Friends meetings and other events.

Collection of personal information

A supporter and / or donor's personal information is collected at the time of the supporter's contact or on making a donation and / or through any additional correspondence between supporters and donors and the Friends trustees. Copies of correspondence between supporters and donors and the trustees and third parties working on the Friends behalf will be or may be retained. Communication with any supporter or donor by the Friends' trustees or third parties working on their behalf will typically be by post or email to the supporter's or donor's nominated postal or email address or through the supporter or donor's agent upon

request. Requests for communication by a different channel will be honoured wherever reasonably practicable.

Sharing of personal information with third parties

The Friends may from time to time work with third parties to fulfil its charitable purposes. It necessarily shares supporters' and donors' personal information with those third parties in furtherance of these endeavours.

The Friends have sought or will seek assurances that such third parties will maintain the confidentiality of supporters' and donors' personal information and process that information only as is necessary to assist the Friends in fulfilling its charitable purposes.

Supporters' and donors' rights relating to their personal information

Supporters and donors have the right to ask for a copy of the personal information held in relation to them or to correct that information at any time. Complaints or queries about data handling or breaches of privacy as well as any supporter's or donor's request for rectification or deletion of or access to their personal data should in the first instance be directed to the Data Protection Officer Dr John Connolly (Connolly.john@btinternet.com), who will normally take steps to address the communication within one calendar month.

Those who, for reasons related to a disability, require this statement in a different format should contact the Friends to discuss their requirements.

Appendix

This legitimate interests assessment (LIA) template is designed to help you to decide whether or not the legitimate interests basis is likely to apply to your processing. It should be used alongside our [legitimate interests guidance](#).

Part 1: Purpose test

You need to assess whether there is a legitimate interest behind the processing.

- Why do you want to process the data?
- What benefit do you expect to get from the processing?
- Do any third parties benefit from the processing?
- Are there any wider public benefits to the processing?
- How important are the benefits that you have identified?
- What would the impact be if you couldn't go ahead with the processing?
- Are you complying with any specific data protection rules that apply to your processing (eg profiling requirements, or e-privacy legislation)?
- Are you complying with other relevant laws?
- Are you complying with industry guidelines or codes of practice?
- Are there any other ethical issues with the processing?

We need to process people's names, contact details and donation record to

1. acknowledge and thank for donations
2. process GiftAid if applicable
3. to inform donors of projects that we are funding
4. to inform donors of our future projects, meetings and events.

We expect individuals to benefit by being informed of how their donations are being used, having the opportunity to meet other supporters of FMH, to contribute to the decision-making process and to contribute to future projects.

We expect to benefit by increasing future donations.

We expect the people of Buhera District Zimbabwe to benefit from this.

If we were unable to process this information we would expect a decline in donations and this would lead to a decline in health care provision at Murambinda Mission Hospital and an increase in morbidity and mortality in Buhera District.

We comply with Charity Commission requirements.

Part 2: Necessity test

You need to assess whether the processing is necessary for the purpose you have identified.

- Will this processing actually help you achieve your purpose?
- Is the processing proportionate to that purpose?
- Can you achieve the same purpose without the processing?
- Can you achieve the same purpose by processing less data, or by processing the data in another more obvious or less intrusive way?

The processing of names and contact details of our supporters and donors will help to maintain our income and hence to help to achieve our charitable objectives:

THE RELIEF OF SICKNESS AND THE PROMOTION OF GOOD HEALTH AMONG THE POPULATION OF BUHERA DISTRICT MANICALAND ZIMBABWE BY THE SUPPORT OF MURAMBINDA HOSPITAL AND ITS ASSOCIATED FACILITIES, AND BY AIDING HEALTH EDUCATION AND HEALTH PROMOTION INITIATIVES.

THE RELIEF OF POVERTY AND SICKNESS OF ORPHANED CHILDREN IN BUHERA DISTRICT AND THE ADVANCEMENT OF EDUCATION OF SUCH CHILDREN.

There are no obvious practical less intrusive alternatives. We do not use software profiling tools and third parties involvement is minimal. We get some data from Mydonate, if the donor consents to this, and some data from our bank.

Part 3: Balancing test

You need to consider the impact on individuals' interests and rights and freedoms and assess whether this overrides your legitimate interests.

First, use the [DPIA screening checklist](#). If you hit any of the triggers on that checklist you need to conduct a DPIA instead to assess risks in more detail.

Nature of the personal data
<ul style="list-style-type: none">• Is it special category data or criminal offence data?• Is it data which people are likely to consider particularly 'private'?• Are you processing children's data or data relating to other vulnerable people?• Is the data about people in their personal or professional capacity?
<p>We do not process special category criminal offence data, children's data or knowingly that relating to vulnerable adults. No DPIA screening trigger identified.</p> <p>We do not use automated decision making, profiling or collate data from a large range of sources.</p> <p>Data may be about people in a personal or professional capacity depending on what they have provided to us.</p>
Reasonable expectations
<ul style="list-style-type: none">• Do you have an existing relationship with the individual?• What's the nature of the relationship and how have you used data in the past?• Did you collect the data directly from the individual? What did you tell them at the time?• If you obtained the data from a third party, what did they tell the individuals about reuse by third parties for other purposes and does this cover you?• How long ago did you collect the data? Are there any changes in technology or context since then that would affect expectations?• Is your intended purpose and method widely understood?• Are you intending to do anything new or innovative?• Do you have any evidence about expectations – eg from market research, focus groups or other forms of consultation?

- Are there any other factors in the particular circumstances that mean they would or would not expect the processing?

We have an existing relationship with most of the individuals on our database. They support the aims of Friends of Murambinda Hospital and have contributed either financially or to the success of fundraising initiatives. Data has been used to send them Annual Reports detailing our activities or occasionally other updates or appeals for donations. Data has also been used to inform supporters of meetings or fundraising events.

We have not obtained data from third parties and have not passed on data to third parties. We may consider the future use of third parties if they would directly further our charitable objects.

Our methods are straightforward and would be in keeping with usual practices for small UK registered charities.

Likely impact

- What are the possible impacts of the processing on people?
- Will individuals lose any control over the use of their personal data?
- What is the likelihood and severity of any potential impact?
- Are some people likely to object to the processing or find it intrusive?
- Would you be happy to explain the processing to individuals?
- Can you adopt any safeguards to minimise the impact?

Our usual processing is not intrusive and we have not to date passed data on to third parties so the risk of loss of control of data is low.

We are a small organisation with five trustees and usually only two have access to the full database. We have no paid or volunteer workers.

Potential risks could include receiving Annual Reports that were not wanted.

Potential data breaches could lead to other people having access to their name, address, email address, phone numbers and potentially to donation history and bank details. This has not happened in almost 20 years of operation.

Can you offer individuals an opt-out?

Yes

Making the decision

This is where you use your answers to Parts 1, 2 and 3 to decide whether or not you can apply the legitimate interests basis.

Can you rely on legitimate interests for this processing?	Yes
Do you have any comments to justify your answer? (optional)	
LIA completed by	Dr Michael Thompson
Date	13/5/18

What's next?

Keep a record of this LIA, and keep it under review.

Do a DPIA if necessary.

Include details of your purposes and lawful basis for processing in your privacy information, including an outline of your legitimate interests.