

Website Privacy Policy.

30th March 2023 Review March 2026

The Doxa Project: structure

We are a charitable company limited by guarantee, with company number 7917747, and registered charity number 1149836 (England and Wales).

Information on this policy

This privacy policy aims to give you information on how The Doxa Project is responsible for your personal data. We collect and process your personal data through your use of this website, including any data you may provide through this website or offline. Please note that we may update this policy from time to time. If you have any queries relating to this privacy policy or our privacy practices, please contact: ben@thedoxaproject.org

We collect information about you if you:

- make a donation or sponsorship to the The Doxa Project;
- are a volunteer of the The Doxa Project;
- apply to volunteer for the The Doxa Project;
- are a Trustee of the The Doxa Project;
- are an employee or agent of one of our suppliers, contractors or business partners;
- visit this website;
- attend a fundraising event;
- contact us with an enquiry or complaint.

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

Identity Data includes first name, last name, title and date of birth.

Contact Data includes address, postal address, email address and telephone numbers.

Financial Data includes bank account and payment card details.

Technical Data includes internet protocol (IP) address, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, and other technology on the devices you use to access this website.

Marketing and Communications Data includes your preferences in receiving marketing from us and our third parties and your communication preferences.

1 – Why we collect and use personal data

We collect personal data to help us to process your requests, keep in touch with you and to help us to interact with you in the most effective way including:

- To keep you updated on our work and the impact of your support;
- To make sure you know about events that you can participate in as a Doxa Project supporter;
- To invite you to participate in campaigns;
- To send you fundraising appeals;
- To support you as a volunteer;
- To process donations or other payments, and verify financial transactions to protect you from fraud;
- To process Gift Aid donations and Gift Aid Declarations;
- To process a legacy or gift that you leave in your will;
- To provide services, products or information you have requested;
- To check with you on how you want us to contact you, and record these preferences;
- To keep notes of conversations that you have with our team, as a reference if you want to revisit the conversation later;
- To notify you of changes to our policies when these affect you;
- To ensure that content from our site is presented in the most effective way for you and your devices;

If we need to do so to comply with a law, process or regulatory requirement; and

To process an application, you may make to us.

2 – How is your personal data collected?

We use different methods to collect data from and about you including through:

Direct interactions

You may give us your Identity and Contact and Financial Data by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:

- apply for sponsorship or donation;
- subscribe to our newsletter;
- request sponsorship information to be sent to you;
- apply as a volunteer or Trustee or
- give us feedback or contact us.
- Third Parties

Sometimes you will also provide data to third parties who then pass it to us with your permission. For example, you may be raising money for The Doxa Project through JustGiving, Facebook or similar fundraising platforms or in usage reports in response to our newsletter via MailChimp's email distribution platform.

3 – How we use your personal data

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Where we need to fulfil a contract, we are about to enter into or have entered into with you as a supplier or partner.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal obligation.

4 - Use of cookies

We use cookies on our website and in our services to distinguish you from other users of our website or services. This helps us to provide you with a good experience when you browse our website or use our services and also allows us to improve the website and services.

What are cookies?

A cookie is a data file stored on a computer hard drive, mobile phone or other device which contains information about the user of our website. Cookies can be “persistent” or “session” cookies. We use persistent cookies and session cookies.

Cookies we use on our website

Our website is built on the Squarespace platform. The cookies used by websites on this platform are described [here](#). This includes information on their type and duration.

Persistent cookies

A persistent cookie is stored on a user’s device in between browser sessions which allows the preferences or actions of a user across the website (or in some cases across different websites) to be remembered. We use persistent cookies to save your login information for future logins to the website or services.

Session cookies

A session cookie allows the website or services to link your actions during a browser session. We use session cookies to enable certain features of the website or services, to better understand how you interact with the website or services and to monitor aggregate usage by users and web traffic routing on the website. Unlike persistent cookies, session cookies are deleted from your computer when you log off from the website or services and then close your browser.

Which cookies we use and why

We use cookies to collect information about how you interact with our website and allow us to remember you. We use this information in order to improve and customise your browsing experience and for analytics and metrics about our visitors to our website.

You can decide whether or not to accept the use of cookies on our website by enabling or disabling cookies in your browser settings. If you do not accept cookies, however, you may not be able to use the whole of the website or all functionality of the services.

To find out more about cookies, including how to see what cookies have been set and how to manage and delete them, visit www.aboutcookies.org. To opt out of being tracked by Google Analytics across all websites visit <http://tools.google.com/dlpage/gaoptout>.

4 – Our legal basis for processing your information

We will always make sure that we consider why we are processing your personal data and identify our legal basis for doing so. Usually this will be because you have given us your consent. We may also process your data where we are furthering our legitimate aims and have assessed that the processing is not likely to be significantly intrusive, or to unduly infringe on your rights and freedoms. In legal terms, this is called the “legitimate interests” basis.

In some cases, we have a legal or statutory duty to process information, and we will always comply with any legal requirement. We may also process your personal data where it is necessary to carry out the terms of a contract which we have with you (or when we are in the process of forming that contract with you).

Processing your data on the basis of your consent:

There are a number of circumstances where we only process your data on the basis of your consent. Examples of this are:

- To send you marketing by email.
- To send you direct messages through social media.
- When you give your consent for us to contact you, but we do not treat this as valid indefinitely. However, we understand that our supporters want to continue to hear from us whilst they have an active relationship with us, and for a period afterwards.

Here are some examples of what we mean by an active relationship:

- If you make a donation or sponsorship payment to us, including regular monthly gifts or sponsorship donations
- If you participate in an event on our behalf (for example fundraising)
- If you tell us that you have left us a gift in your Will
- If you take a campaigns action for us, such as signing a petition
- If you have an ongoing conversation with one of our fundraisers about our work

We will consider your consent to be valid whilst you take these actions, and then for 5 years afterwards, to enable us to keep you up to date with our work and to offer you other ways you might choose to support us. At the end of this time period then we will get in touch with you to re-confirm that you are happy to continue to hear from us.

You can withdraw your consent at any time. If you wish to do so, or have any questions on this, please do contact us at: ben@thedoxaproject.org

The Legitimate Interests basis

We have a duty to community of Kwa Murugi who we stand with: to promote ourselves and our work; to responsibly raise as much money as possible to further our charitable aims; to update our supporters and the general public on our progress; and to operate in an effective way. We always pursue these interests in a respectful manner, with our supporters at the heart of what we do.

We might further our legitimate interests in the following ways:

- To communicate with you about marketing and fundraising materials or products:
- To send you mail relating to activity that we think you may be interested in (unless you have told us you do not want this). We will always consider how much mail you receive from us, and what the topic is, to ensure that it is appropriate.
- To manage our everyday business needs
- To update our database records to keep them accurate, for example, to amend an address where we receive returned mail.

You have the right to object to us processing your data on the grounds of our legitimate interests. If you would like us to stop using your data on this basis, please do get in touch with us. You will also see an 'unsubscribe' link on our newsletter communications where we are using the legitimate interest basis, and you can also tick this to ask us to stop sending these.

5 – How we work with third parties in processing personal data

At The Doxa Project, we sometimes work with third parties. It's important that you understand the circumstances where this might happen, and who we work with. These are some examples of how we work with third parties:

Where we sign a contract with a third-party supplier to carry out services for us. These contracts will always hold a supplier to our own high standards of data protection, to ensure that they treat your information with the same care as we do.

- Where you register to take part in an event, and we have to provide your details to the event organiser to secure your place.
- Where a company sends us data because you have given permission for them to share it, for example, where you set up an online giving fundraising page, sign up for an event via a third party.
- Where we legally have to share information. For example, if you make a Gift Aid declaration to enable us to claim Gift Aid on donations that you make, we have to share your name and address with HMRC so that they can audit our claim.

Whenever we work with a company in this way, we will always have a contract with them, to be certain that they treat your data with the same level of care and respect as we do. We will only send them the data that they need to carry out their specific service, and they are required to delete it or return it to us once they have completed this. Your data will only ever be passed to them for the services that they carry out on our behalf, it is never shared for their marketing purposes.

Event organisers

Some events require us to pass your personal information to the event organisers to secure your place. We will always make this clear to you at the point of your registration, so you understand the information that we will transfer, and who will receive it.

Where we have a legal requirement

We will always share data where we have a legal requirement to do so. Examples of this include providing audit information to HMRC for our Gift Aid claims or if we are required to do so by law enforcement officials. If we were to merge with another charity or restructure, we may also share your personal details with other entities involved in the merger/restructure for that purpose.

6 – How long we keep your data for

We will only retain your personal data for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

We want to make sure that we have up to date records for as long as you are actively supporting The Doxa Project, so for as long as you take actions on our behalf or to engage with us, such as participate in our campaigns, donate to us or correspond with us. Once you are no longer an active supporter, we will keep your data for a set period of time, which we calculate depending on the information that you originally provided, and why you gave it to us. At the end of this time period, we will remove any personal details from our records of you, to ensure that any information is entirely anonymous.

In general, we will keep records of financial donors for at least seven years after your last donation, to meet our requirements for any audits and in particular Gift Aid audit from HMRC

If none of these circumstances apply to you then we will keep your data for five years. We want to make sure that we have appropriate records of any conversations or enquiries, in case you ask us to come back to them later.

What happens at the end of this time period?

At the end of this time period, we will remove your personal details from our records, to ensure that they are entirely anonymous. We keep records on how our supporters have interacted with us, but not of who those supporters are. For example, we want to be able to see how many supporters donated to a particular appeal, told us that they took a campaign

action or requested information from us. This helps us to understand how to use our resources in the future, so that we can raise funds in the most effective way.

You have a right to be forgotten, which means that you can ask us to delete your personal details before the end of the time limits above. You should know that there are some circumstances where we may need to keep your details, for example, in order to comply with a legal obligation. If this situation occurs then we will explain and discuss these circumstances with you.

7 – How we keep your information secure

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality. We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

We make sure that only volunteers and staff who need to access your personal data for the role they perform, can do so. Any member of our staff who has access to your personal data will receive training to make sure that they understand the importance of keeping your information and its privacy safe and secure at all times.

Whilst we take all of the measures that we've outlined above, unfortunately, the transmission of information using the internet is not completely secure. Although we will do our best to protect your personal data sent to us this way, we cannot guarantee the security of data transmitted to our site.

In the extremely unlikely event that we experience a data breach, our chair of trustees would immediately work with the Information Commissioner's Office if necessary.

8 – Where we keep your information and when it might be transferred outside of Europe

The Doxa Projecty is aware that countries outside of the UK and the European Economic Area have differing standards of data privacy. Much of our data is kept within The Doxa

Project systems here in the UK, but there are a number of exceptions that you should be aware of:

We contract with MailChimp for email distribution, who hold the minimum set of your personal data if you have subscribed for our newsletter. MailChimp may transfer that information to data centres outside of the UK or European Economic Area. For more information on how MailChimp handle your data please [click here](#).

9 – How we use your information if you apply for a role at Beehive

We collect information from anyone who applies to work or volunteer at Beehive. We only use this information for our recruitment or employment purposes and it is entirely separate to our supporter data. As an applicant or employee, you are entitled to the same rights as our supporters, and these are outlined in our Rights section.

Volunteers and Staff

When you apply to volunteer at the Beehive we will ask for information about you and your work history to understand how your skills and past experience matches the requirements of a role.

There are two circumstances where we might disclose details outside of Beehive as we process your application:

1. We may ask for details of referees, and we will contact them to verify the information that you have given us – when we contact them, we will share your name and the role that you have applied for. We contact referees on the basis of our legitimate interests as an organisation to understand applicants and their suitability for the roles they apply for.
2. Some roles also require us to obtain a disclosure from the Disclosure & Barring Service. This will be clearly marked in the advertisement, and so we will not give you further notice before we apply for this disclosure.

All candidates applying to work or to volunteer at Beehive will automatically have their application details saved and retained for 12 months. We will use this to identify candidates

who were unsuccessful in their application, but who we feel may have an interest in and suitability for another role. If you would like for us to remove your personal details from our system at any time before that, please contact us.

10 – Understanding your rights

It is important that you understand your legal rights around your personal data and how we may use it. If you would like to discuss or exercise any of these rights, please do get in touch with us.

Right to be informed

This Privacy Policy ensures that you are informed about how we will process your personal data. You might also see messages on some of our forms (or otherwise when we collect personal data from you) that explain why we ask for specific pieces of information from you.

Right of access

You have the right to access a copy of your personal data and receive certain information about what the data is and how and why we are processing it. Please note that we will require you to prove your identity before we disclose any information.

Right to rectification

If you feel that any of the information that we hold about you is incorrect, do let us know so that we can look into it and amend if necessary

Right to object

You have the right to object to the processing that we have outlined in this policy.

Right to erasure / to be forgotten

You have the right to request that we delete your information and can discuss this with us at any time. You should know that there are some circumstances where we may need to keep your details, for example, if it is necessary to comply with a legal obligation on us. If this situation occurs, then we will explain and discuss these circumstances with you.

Right to restrict processing

You can request that we restrict processing of your data, as an alternative to deleting it – this means that we will keep the data but stop processing for most purposes. You may want to exercise this right if you feel that the data is inaccurate, that our processing of it is unlawful, whilst we progress a request from you to object to processing, or if we have no further need of the data, but you require us to keep it in relation to the establishment, exercise or defence of a legal claim.

Rights related to automated decision making

You have rights to avoid being subject to decisions based solely on automated processing (including profiling) which has a significant effect on you. At The Doxa Project we do not carry out any such processing.

Right to data portability

You have the right to request a copy of certain personal data to have it transferred to another organisation in certain circumstances.

You should know that there are some circumstances where these rights may not apply, but where this is the case, we will always explain this to you.

Questions, concerns and complaints

Please do contact us at ben@thedoxaproject.org or write to 'Company Secretary' at our company address if you have any questions or concerns on how we collect and use your personal data, or on your rights, as we are always happy to speak to you. If you are unhappy

with our response to the way we are handling your personal data, you also have the right to make a complaint direct to the UK's data protection authority, the Information Commissioner's Office (ICO). The ICO can be contacted at: <https://ico.org.uk/global/contact-us/> .