

Last updated: 23rd April 2021

MicroLoan Foundation Privacy Policy

MicroLoan Foundation (“**MicroLoan**”, “**we**”, “**our**”, or “**us**”) is a women’s empowerment and poverty alleviation charity registered in the UK. We rely on the generosity of thousands of supporters to help some of the poorest women in sub-Saharan Africa to find a way out of poverty.

We are committed to protecting your personal data, which is any information relating to an identified or identifiable natural person (a “**Data Subject**”) (“**Personal Data**”). This Privacy Policy relates to our use of any Personal Data you provide to us through www.microloanfoundation.org.uk (the “**Website**”) or other means, how we use it, and the rights that you have in relation to your Personal Data.

If you have any comments, questions or concerns regarding this Privacy Policy, please contact us at contact@mlf.org.uk, call +44 (0) 208 827 1688, or write to us at MicroLoan Foundation, 1-2 Paris Garden, London, SE1 8ND. The relevant contacts are: Malin Rosenkvist, Director of Fundraising and Communications (malin.rosenkvist@mlf.org.uk), and Nel Cabral, Fundraising Administrator (nel.cabral@mlf.org.uk).

MicroLoan will comply with all applicable data protection laws, including the UK-implemented General Data Protection Regulation (Regulation (EU) 2016/679) and the UK Data Protection Act 2018 (“**Applicable Data Protection Laws**”). For the purposes of Applicable Data Protection Laws, MicroLoan is a “**Controller**”. This means that MicroLoan is responsible for deciding how we handle and use your Personal Data.

Processing means any operation or set of operations which is/are performed on Personal Data or on sets of Personal Data. This is a broad definition, and ranges from the collection of Personal Data, to the organisation or storage of Personal Data, to the disclosure/transfer of Personal Data, to the use of Personal Data.

What information does MicroLoan collect about me?

We may collect Personal Data directly from you when you interact with MicroLoan. For example, this could occur when you:

- sign up to one of our campaigns;
- enquire about or participate in an event;
- volunteer with us;
- make a donation;
- use our Website; or
- otherwise provide us with Personal Data.

Information may be collected over the telephone, in person, through the post, online via our Website, or via third party sites linked to our events or fundraising work. We may also receive information about you from other sources, as explained below.

The information we collect may include:

- your name;

- your post and/or email address;
- your telephone number;
- your bank details (if you are making a donation or financial transaction);
- technical access data when using our Website (for example IP address, browser type, time zone setting and location); and/or
- website usage information (i.e. information about how you use our Website).

The types of Personal Data that we collect and how we use it depends on the reasons for which you provide it to us.

Please note that we will not store your bank account or credit card details. If you make a donation via our Website, all payments are processed via Blackbaud.

We do not knowingly collect Personal Data relating to children under the age of 16. If we obtain actual knowledge that we have collected Personal Data relating to a child under the age of 16, we will promptly delete that data.

This Privacy Policy does not apply to MicroLoan's subsidiaries or beneficiaries in other jurisdictions, which may process the Personal Data of children under 16 years of age.

What data do you collect from my IP?

We collect statistics about visits to the Website based on your IP address (an IP address is a number that uniquely identifies a specific computer or network device on the internet). This data is used to help us understand browsing preferences so that we can improve the Website. We do not use this data to identify you as an individual and you will remain anonymous. MicroLoan uses measurement and analysis tools to gather information regarding visitors to our Website using cookies, log file data, and code that is embedded on the Website. This type of information is used to help us provide you with a better user experience on our Website.

How do we use your Personal Data?

The legal basis that we rely upon to Process your Personal Data will depend on the circumstances in which it is collected and used. In most cases, the legal basis will be one of the following:

- you have provided consent for us to use the Personal Data in a particular way;
- the Processing is necessary for the performance of a contract with you;
- the Processing is necessary for a legal obligation we have; and/or
- the Processing is necessary for our legitimate interests, for example carrying out our charitable objectives.

Why do we use your Personal Data?

We may use your Personal Data for one or more of the following purposes:

- to let you know how your donation is helping our work;
- to provide you with the services, products or information you have requested, such as the newsletter campaign products or event information;

- to process donations or other payments;
- to reclaim Gift Aid, where authorised to do so by you;
- to send you fundraising campaign information;
- to record any contact we have with you to help us ensure we provide you with the most appropriate communications;
- to notify you of changes to our policies;
- to check on your preferences in order to ensure they are up to date.

We may also use your Personal Data for other purposes that we will specifically notify you about and, where appropriate, for which we will obtain your consent.

We will ask for your consent to send you marketing emails, but we may also rely on the legitimate interest of the charity to get in touch with you, in order to raise much-needed funds. You can always choose not to receive marketing communications from MicroLoan. If you are already receiving such communications you can ask us to stop at any time, including by clicking 'unsubscribe' on all emails received from us.

We may make use of profiling to provide a better experience for our supporters, including by producing communications that are more relevant to you. Profiling means that we will look at your giving history to help us target our resources more effectively. It helps us to build relationships that are most appropriate to our individual supporters' interests and donation levels. We use only publicly available information and do not rely on data brokers, investigators or third parties for this work. If you would prefer that we did not do this, you can let us know at any time by contacting us at contact@mlf.org.uk.

If we were to merge with another charity or to restructure, we may share your personal data with other entities involved in the merger/restructure.

International transfers of personal data

We may transfer your Personal Data to our affiliates based in other countries. This assists our effective communication with supporters based outside of the UK. For example, we may transfer Personal Data to the United States for to enable US-based supporters to be invited to US-specific events.

Your Personal Data may be processed in countries that may not provide the same level of protection with respect to Personal Data as the UK. We have put in place appropriate intra-group agreements using the approved Standard Contractual Clauses for controllers or processors, as appropriate, to protect intra-group transfers of Personal Data between our UK office and the MicroLoan representative offices in the United States and Australia. Please contact us should you require further information in this regard.

How do you work with third parties in processing my Personal Data?

Certain third party organisations collect data on our behalf as well as for their own use. We may receive your personal details from third party organisations for marketing purposes where you have agreed for this information to be shared.

Third party organisations we currently receive data from include JustGiving, Virgin Money Giving, Stewardship, Benevity, Charitable Giving, Charities Trust, Barclays, Transferwise, The Big Give, CAF, Blackbaud, Paypal, Zoom, Stripe, Work For Good and Eventbrite.

We also use trusted third parties to provide services and to process your Personal Data on our behalf, including communications handling. Some of these third parties may be based outside the UK where data protection laws may provide lesser protection than under UK laws. However, we will only provide those companies with the information they need to deliver the specific service and we require them to ensure that your data is treated in accordance with Applicable Data Protection Laws.

We can provide further information to you about these trusted third parties on request.

MicroLoan will disclose or use personal information if required to do so by law, and may use external data for the purposes of fraud prevention, for example to comply with money laundering regulations. More details can be found at www.fundraisingregulator.org.uk. We may share your Personal Data with our legal advisors for the purposes of obtaining advice and for the protection of our legal rights.

How secure is the information I give you?

We are serious about maintaining the security of your Personal Data and the details of any transactions made. We take appropriate organisational and technical security measures to protect your data against unauthorised disclosure or processing.

Our server and backups used to store the data you give us are held in a secure environment behind firewalls and are password protected. However, you should keep in mind that no Internet transmission is ever completely secure or error-free. In particular, any email sent to or from our Website or us may not be secure. Accordingly, MicroLoan is not responsible for the security of information transmitted via the internet and any such transmission is at your own risk.

For how long will you keep my information?

We will retain your Personal Data on our system for as long as you have an active relationship with MicroLoan, and/or as long as is necessary for the legitimate purposes of our legal rights and obligations.

If you cease to have an active relationship with us or request to receive no further contact, we will retain some basic information in order to avoid sending you unwanted materials in the future, and to ensure that we do not accidentally duplicate information.

Links

Our Website may contain links to sites not owned or managed by us. Clicking on those links may allow third parties to collect or share information about you. We cannot be held responsible for the privacy of information collected by websites not managed by us. When you leave our Website, we encourage you to read the privacy policies of other sites you visit.

Cookies

MicroLoan's Website uses a small number of cookies. A cookie is a small text file created by your browser and stored on the hard drive of your computer. You can find out more about cookies at:

- www.allaboutcookies.org and www.youronlinechoices.eu if you are in Europe; or
- www.aboutads.info/choices if you are in the United States of America.

There are two main types of cookies: *Session* and *Persistent* cookies. Our Website uses persistent cookies, which allow the Website to remember information that would otherwise be lost when your browser is closed. Persistent cookies remain on your device until the expiry date specified in the cookie is reached. Our Website also uses session cookies, which are automatically removed from your device when you close your browser. Our Website uses cookies to distinguish you from other users of our Website. This helps us to provide you with a better experience when you browse our Website and also allows us to improve our Website.

Our Website uses both first-party cookies and third-party cookies. First party cookies are cookies that are placed on your device by the website provider and are commonly used to recognise your device and remember your preferences. Third-party cookies are served by a service provider on behalf of the website provider (for example, Google) and are commonly used for website analytics or advertising purposes.

We use the following non-session cookies:

Cookie	Name	Purpose	More information
EU Cookie Law Version 3.1.4	EU Cookie Law	This cookie informs users that the Website uses cookies, with an option to lock scripts before consent is provided.	https://wordpress.org/plugins/eu-cookie-law/
Facebook for WordPress Version 3.0.4	Facebook for WordPress	This is an analytics tool that helps us to measure the effectiveness of our advertising. It allows us to understand the behaviour of visitors to our Website and enables us to reach our audiences better.	https://wordpress.org/plugins/official-facebook-pixel/

Your rights and the ability to complain

If you are in the UK or EEA, you have a number of rights relating to your Personal Data under Applicable Data Protection Laws. These include your right to:

- access a copy of the Personal Data we hold about you;
- correct inaccuracies in the Personal Data we hold about you;
- in certain circumstances, have your Personal Data erased;
- in certain circumstances, restrict our Processing of your Personal Data;
- in certain circumstances, object to our Processing your Personal Data;
- transfer the Personal Data we hold about you to a third party; and
- withdraw your consent to our Processing your Personal Data.

If you would like to exercise any of your rights under Applicable Data Protection Laws, or complain about the way MicroLoan is using your Personal Data, please contact us at contact@mlf.org.uk or write to us at MicroLoan Foundation, 1-2 Paris Garden, London SE1 8ND.

We reserve the right to change this Privacy Policy from time to time, so please check it periodically. This policy was last update on 23 April 2021.