



International BethanyKids Privacy Policy

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PREAMBLE

In accordance with applicable laws, BethanyKids is committed to protecting the privacy of its donors, volunteers, employees, directors, officers and any other persons about or from whom BethanyKids collects personal information.

BethanyKids embraces the principle that all personal information is properly collected, used only for the purposes for which it is collected, and is disposed of in a safe and timely manner when no longer required.

The term "Personal Information" as used in this Policy means any information that relates to an identified or identifiable individual. BethanyKids collects personal information provided directly by the individual and when visiting the website.

BethanyKids collects and processes the following information:

- Contact information: name and contact details including address, postcode, telephone number and email address
- Financial information
- Website user stats information: Internet Protocol (IP) address and information on how the website is used, using cookies

1. ACCOUNTABILITY

BethanyKids is responsible for maintaining and protecting the personal information under its control. It has appointed a Privacy Officer (privacy@bethanykids.org) who is responsible to ensure that it complies with its privacy obligations in accordance with applicable privacy laws.

2. IDENTIFYING PURPOSES

BethanyKids collects personal information provided directly by the individual and when visiting the website. The personal information is used for a variety of purposes including, but not necessarily limited to:

- Employee / volunteer records
- Managing payroll and benefits
- Employee / volunteer performance evaluations
- Board membership
- Establishing and maintaining a list of donors and their donations

3. CONSENT

The Privacy Officer shall ensure that individuals consent to the information being gathered from them and how it is to be used. The Officer will ensure that express consent is obtained wherever possible. Implied consent may be acceptable but will depend upon the sensitivity of the information and the purpose for the information. The

Officer shall ensure that the individual may withdraw consent at any time, subject to legal or contractual restrictions and reasonable notice. The legal basis for processing personal information is that it is necessary to perform contractual obligations. We have a legitimate interest in carrying out the processing or prior consent has been obtained.

4. LIMITING COLLECTION

BethanyKids limits the collection of information to that required for the purposes identified by BethanyKids. BethanyKids is committed to collecting personal information in a fair, open and lawful manner. The Officer shall ensure that financial information will be collected only for completing the transaction and will not be retained for any other purpose thereafter.

5. LIMITING USE, DISCLOSURE AND RETENTION

BethanyKids does not use or disclose information for purposes other than those for which it was collected, except with the consent of the person or as required by law. All collected personal information shall be destroyed, erased or made anonymous as soon as the purpose for which it was collected is no longer relevant, or as permitted by the law.

6. ACCURACY

BethanyKids maintains personal information in as accurate, complete and up-to-date form as possible in order to fulfil the purposes for which it was collected.

7. SAFEGUARDS

BethanyKids protects personal information by safeguards that are appropriate to the sensitivity of the personal information. Information kept in a physical form will be kept in a locked cabinet. Digital information will be kept on encrypted hardware. Access to information will be restricted to only those whose job or duties require access. When personal information is to be destroyed, the Officer will ensure that proper care is taken to delete, destroy and properly dispose of the information to prevent unauthorized access.

BethanyKids will only retain personal information for as long as necessary to fulfil the purposes for which it was collected and processed, including for the purposes of satisfying contractual obligations. Personal information will only be kept if necessary and for the duration required under applicable laws and regulations. Data retention obligations might differ within BethanyKids national entities subject to applicable local laws and regulations.

8. OPENNESS

The Privacy Policy for BethanyKids shall be made available on the BethanyKids website. BethanyKids will make information available regarding the management of personal information, upon request. The information will include:

- Name and contact information for the Privacy Officer
- Means of gaining access to personal information held by BethanyKids
- How to lodge a request or complain to BethanyKids
- Any documents that explain BethanyKids' policies

- What personal information is disclosed to related organizations, if any

9. Access to Personal Information

BethanyKids will grant access to personal information it has on file to the person to whom the information pertains, provided that the disclosure does not violate any applicable statutes or contracts. Any inaccuracy or incompleteness of personal information will be amended as required. Response to a request will occur as quickly as possible or within 30 days. If additional time is required, the individual would be informed of the delay prior to the extension. If we are unable to grant access to the personal information, we will explain why and provide some means of recourse if possible.

As individual has the following rights, which can be exercised under certain circumstances in relation to the personal information held by BethanyKids:

Right to request:

- information about how the personal information is processed
- a copy of personal information
- that anything inaccurate in the personal information held is corrected immediately
- raise an objection about how the personal information is processed
- request that the personal information is erased if there is no longer a justification for it
- ask that the processing of the personal information is restricted in certain circumstances

To exercise the above listed rights, contact the Privacy Officer
(privacyofficer@bethanykids.org)

10. Challenging Compliance

Complaints or inquiries about the collection, use, disclosure or retention of personal information should be directed to the Privacy Officer. The Privacy Officer will respond to such inquiries, investigate complaints and ensure that appropriate measures are taken.

11. MAILING ADDRESS

In addition to the above privacy email, complaints can also be sent by traditional mail.

BethanyKids Canada
PO Box 1202
Kingston, ON K7L 4Y8

Information and Privacy
Commissioner of Ontario:
www.ipc.on.ca

Forms for specific complaints about
Privacy can be found at:
www.ipc.on.ca/privacy-individuals/filing-a-privacy-complaint

BethanyKids UK
72 Bradbourne Road
Sevenoaks, Kent TN13 3QA

*A complaint may also be made to the
Information Commissioner, who is an
independent regulator:
Information Commissioner
icocasework@ico.org.uk
Telephone: 0303 123 1113*

Information Commissioner's Office
Wycliffe House, Water Lane
Wilmslow, Cheshire, SK9 5AF

BethanyKids USA
PO Box 1297
Abingdon, VA 24212-1297