



Rainbows4children Foundation Rainbows4children (UK) Trust Data Protection policy

Policy prepared by Kathryn Robinson: February 2018

Policy effective: March 6th 2018

Next review date: March 2019

Why this policy exists

This data protection policy (“Policy”) is issued by Rainbows4children Foundation and Rainbows4children (UK) Trust (together herein, “Rainbows4children” or “R4C”). The Policy requires that R4C

- Complies with data protection law and follows good practice
- Protects the rights of trustees, donors, partners, and all individuals from whom R4C collects data
- Is open about how it stores and processes individuals’ data
- Protects itself from risks of a data breach

Data protection law

The EU General Data Protection Regulation (GDPR) comes into force on 25th May 2018. At the heart of the GDPR is a requirement for transparency. It is required that individuals understand how Rainbows4children collects and uses personal information.

Rainbows4children has the following policy and procedures for the collection, holding and use of data:

- The Data Controller is normally the secretary and co-founder of R4C, Kathryn Robinson, tel: +41 78 626 2364, kwrlachen27@gmail.com. Reference herein to Data Controller shall include any person appointed or delegated by the Data Controller to perform specific duties under the Policy.
- Data is normally collected on line, in routine correspondence, in written form at fund-raising or promotional events, when given by a donor, or from bank transfer information at the time of donations.
- R4C does not purchase data, nor does it take data from any public sources (such as telephone books, electoral registers or donation websites). On donation websites, if a donor mark “no marketing material” this is respected and no data is recorded.
- R4C collects and retains the following personal data:
 - 1) Postal addresses and email addresses to enable the production and distribution of receipts for donations.
 - 2) Email addresses for:
 - a) communication of information about progress of sponsored students at the Nicolas Robinson School;



b) the production of periodic update newsletters for previous and current donors to Rainbows4children.

c) the request for support from donors for special skills, or to promote a special regional event relevant to donors.

3) Details of sponsored students at the Nicolas Robinson School, including, for example, their date of birth and general family circumstances, to enable a connection between the student and his or her sponsor.

4) Salary lists of all employees at the Nicolas Robinson School for budgeting and financial control reasons only.

- Individuals have the right to request the removal of their personal data from the data bases at any time by sending an email to the Data Controller.
- Individuals have a right to lodge a complaint with the relevant local body. For example, in the UK this would be the ICO.
- Individuals who have donated to R4C are considered as having a legitimate interest in the progress of the aims of Rainbows4children and to see that their donations have been used wisely and as directed.
- No personal data is ever shared with other organisations, nor is it bought from or sold to commercial mailing lists.

On the R4C website, any links to external sites are not the responsibility of R4C. Once users click on an external site, they will be subject to the privacy policy of the third-party organisation and not that of R4C.

Personal data is kept by the Data Controller and is not passed to other members of R4C unless specifically authorised by the Data Controller and for a specific purpose relevant to R4C and/or the Nicolas Robinson School and their aims and objectives. A back-up of all data is kept in a password protected, cloud-based back up, for security.

All individuals are entitled to know what personal data is held about them and why. Should they wish to know this information, they may request this information from the Data Controller. This data will be released subject to an administration fee of £10/US\$15 being paid to the R4C account, per subject access request. The data controller will aim to provide the relevant data within 14 days. The Data Controller will always verify the identity of the person making the subject request before handing over any information.

Policy approved by Rainbows4children trustees: 6th March 2018

Richard Max Robinson (Switzerland & UK)

Kathryn Robinson (Switzerland & UK)

Jean-Paul Rigaudeau (Switzerland)

John Bateson (UK)

Paul Reynolds (UK)

Philip Stockbridge (UK)