



Together there is enough

COMMON CHANGE UK PRIVACY POLICY FOR GROUP MEMBERS

BACKGROUND:

Please read this Privacy Policy carefully and ensure that you understand it.

Common Change UK understands that your privacy is important to you and that you care about how your personal data is used. We respect and value the privacy of everyone who interacts with us online via our two connected platforms:

- Commonchange.uk – the public website for our UK registered charity
- App.commonchange.com – the global platform used to manage all user accounts

We will only collect and use personal data in ways that are described here, and in a way that is consistent with our obligations and your rights under the law.

1. Information About Our Websites

Commonchange.uk is a publicly-accessible website owned and operated by Common Change UK (CCUK).

CCUK is regulated by The Charity Commission for England and Wales (no.1171076) also registered with The Information Commissioners Office (no. ZB581684) and also with The Fundraising Regulator.



CHARITY COMMISSION
FOR ENGLAND AND WALES



Registered address: Saffron Grove, Crowborough, East Sussex, TN6 2GJ

Data Protection Officer: Fiona Stiff.

Email address: hello@commonchange.uk

App.commonchange.com is a password-protected member management website owned and operated by our connected charity in the USA: 'Relational Tithe Inc.' which is the legal name of the Common Change brand in the USA, registered as a 5013(c) entity by the IRS (EIN: 20-2942970).

Common Change UK utilises the **app.commonchange.com** platform by agreement.

Registered address: Congress Ave, Oakland, California 94601, United States

Email address: support@commonchange.com

2. What Does This Policy Cover?

This Privacy Policy applies only to your use of the websites listed above. Our websites may contain links to other websites.

Please note that we have no control over how your data is collected, stored, or used by other websites and we advise you to check the privacy policies of any such websites before providing any data to them.

3. **Definitions and Interpretation**

In this Policy the following terms shall have the following meanings:

- “Account”** means an account required to access and/or use certain areas and features of our websites;
- “Cookie”** means a small text file placed on your computer or device by our websites when you visit certain parts of our websites and/or when you use certain features of our websites. More details on Cookies are set out in Part 14, below; and
- “Cookie Law”** means the relevant parts of the Privacy and Electronic Communications (EC Directive) Regulations 2003;

4. **What Is Personal Data?**

Personal data is defined by the UK GDPR and the Data Protection Act 2018 (collectively, “the Data Protection Legislation”) as ‘any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier’.

Personal data is, in simpler terms, any information about you that enables you to be identified. Personal data covers obvious information such as your name and contact details, but it also covers less obvious information such as identification numbers, electronic location data, and other online identifiers.

5. **What Are Your Rights?**

Under the Data Protection Legislation, you have the following rights, which we

- a) The right to be informed about our collection and use of your personal data. This Privacy Policy should tell you everything you need to know, but you can always contact us to find out more or to ask any questions using the details in Part 12.
- b) The right to access the personal data we hold about you. Part 11 will tell you how to do this.
- c) The right to have your personal data rectified if any of your personal data held by us is inaccurate or incomplete. Please contact us using the details in Part 12 to find out more.
- d) The right to be forgotten, i.e. the right to ask us to delete or otherwise dispose of any of your personal data that we hold. Please contact us using the details in Part 12 to find out more.
- e) The right to restrict (i.e. prevent) the processing of your personal data.
- f) The right to object to us using your personal data for a particular purpose or purposes.
- g) The right to withdraw consent. This means that, if we are relying on your consent as the legal basis for using your personal data, you are free to withdraw that consent at any time.
- h) The right to data portability. This means that, if you have provided personal data to directly, we are using it with your consent or for the performance of a contract, and that data is processed using automated means, you can ask us for a copy of that personal data to re-use with another service or business in many cases.
- i) Rights relating to automated decision-making and profiling. We do not use your personal data in this way.

For more information about our use of your personal data or exercising your rights as outlined above, please contact us using the details provided in Part 12.

It is important that your personal data is kept accurate and up-to-date. If any of the personal data we hold about you changes, please keep us informed as long as we have that data.

Further information about your rights can also be obtained from the Information Commissioner's Office or your local Citizens Advice Bureau.

If you have any cause for complaint about our use of your personal data, you have the right to lodge a complaint with the Information Commissioner's Office. We would welcome the opportunity to resolve your concerns ourselves, however, so please contact us first, using the details in Part 12.

6. What Data Do We Collect and How?

Depending upon your use of our websites, we may collect and hold some or all of the personal and non-personal data set out in the table below, using the methods also set out in the table. We do not collect any 'special category' or 'sensitive' personal data, personal data relating to children or data relating to criminal convictions and/or offences.

| Data Collected | How [We] OR [I] Collect the Data |
|--|---|
| Identity Information including your name and in some circumstances, gender. | Via self-complete web forms, email correspondence and telephone calls.. |
| Contact information including your email address and in some circumstances, home address and telephone number. | Via self-complete web forms, email correspondence and telephone calls. |
| Your bank account details if you are a direct donor via BACS or Standing Order. Note: We do not have access to the Credit Card details of online donors using the Donorbox service. | Via self-complete web forms and bank feeds. |
| Technical information including IP address, browser type, operating system. | Via systems analytics. |

7. How Do You Use My Personal Data?

Under the Data Protection Legislation, we must always have a lawful basis for using personal data. The following table describes how we may use your personal data, and our lawful bases for doing so:

| What We Do | Our Lawful Basis |
|--|--|
| Registering you as an interested party | Consent. By completing an enquiry form you have consented to an informal correspondence relationship with us. |
| Administering your group membership, including communicating with you by email, telephone or SMS | Contract. By joining a Common Change group you have entered into a service contract with us that requires use of your data to fulfil. |
| Supplying our services to you, including managing your donations and requests | Contract. By joining a Common Change group you have entered into a service contract with us that requires use of your data to fulfil. |
| Administering our business | Legitimate interests. In order to comply with the expectations of the organisations responsible for regulating our sector (see point 1). |

With your permission and/or where permitted by law, we may also use your personal data for marketing purposes, which may include contacting you by email and/or telephone and/or text message with information and news about our network.

You will not be sent any unlawful marketing or spam. We will always work to fully protect your rights and comply with our obligations under the Data Protection Legislation and the Privacy and Electronic Communications (EC Directive) Regulations 2003, and you will always have the opportunity to opt-out.

We will not share your personal data with third parties for marketing purposes.

We will only use your personal data for the purpose(s) for which it was originally collected unless we reasonably believe that another purpose is compatible with that or those original purpose(s) and need to use your personal data for that purpose. If we do use your personal data in this way and you wish us to explain how the new purpose is compatible with the original, please contact us using the details in Part 12.

If we need to use your personal data for a purpose that is unrelated to, or incompatible with, the purpose(s) for which it was originally collected, we will inform you and explain the legal basis which allows us to do so.

In some circumstances, where permitted or required by law, we may process your personal data without your knowledge or consent. This will only be done within the bounds of the Data Protection Legislation and your legal rights.

8. How Long Will You Keep My Personal Data?

We will not keep your personal data for any longer than is necessary in light of the reason(s) for which it was first collected. Your personal data will therefore be kept for the following periods, for retrospective audit purposes and in case of regulatory review.

| Type of Data | How Long We Keep It |
|---------------------------|--|
| Identity Information | For as long as you remain a member and up to 5 years afterwards. |
| Contact information | For as long as you remain a member and up to 5 years afterwards. |
| Your bank account details | For as long as you remain a member and up to 5 years afterwards. |
| Technical information | For as long as you remain a member and up to 5 years afterwards. |

9. How and Where Do You Store or Transfer My Personal Data?

We will store some of your personal data in the UK. This means that it will be fully protected under the Data Protection Legislation.

AND

We will store some or all of your personal data in countries outside of the UK. These are known as “third countries”. We will take additional steps in order to ensure that your personal data is treated just as safely and securely as it would be within the UK and under the Data Protection Legislation as follows:

We ensure that your personal data is protected under binding corporate rules. Binding corporate rules are a set of common rules which all our group companies are required to follow when processing personal data. For further information, please refer to the [Information Commissioner’s Office](#).

NOTE

We only store or transfer personal data in or to countries that are deemed to provide an adequate level of protection for personal data. For further information about adequacy decisions and adequacy regulations, please refer to the [Information Commissioner's Office](#).

Please contact us using the details below in Part 12 for further information about the particular data protection safeguards we use when transferring your personal data outside the UK.

The security of your personal data is essential to us and to protect your data, we take a number of important measures, including the following:

- limiting access to your personal data to those employees, agents, contractors, and other third parties with a legitimate need to know and ensuring that they are subject to duties of confidentiality;
- procedures for dealing with data breaches (the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, your personal data) including notifying you and/or the Information Commissioner's Office where we are legally required to do so;
- this includes ensuring that member data is only ever stored within secure, password-protected databases.

10. **Do We Share Members' Personal Data?**

We will not share any of your personal data with any third parties for any purposes, subject to the following exception;

- In some limited circumstances, we may be legally required to share certain personal data, which might include yours, if we are involved in legal proceedings or complying with legal obligations, a court order, or the instructions of a government authority.

If any of your personal data is shared with a third party, as described above, we will take steps to ensure that your personal data is handled safely, securely, and in accordance with your rights, our obligations, and the third party's obligations under the law, as described above in Part 8.

11. **Can I Withhold Information?**

You may access **commonchange.uk** without providing any personal data at all. However, to use the features and functions available on **app.commonchange.com** you are required to allow for the collection of the data described in the points above.

12. **How Can You Access Your Personal Data?**

If you want to know what personal data we have about you, you can ask us for details of that personal data and for a copy of it (where any such personal data is held). This is known as a "subject access request".

All subject access requests should be made in writing and sent to the email or postal addresses shown in Part 12.

There is no charge for a subject access request.

We will normally respond to your subject access request within 7 days and, in any case, not more than one month of receiving it. Normally, we aim to provide a complete response, including a copy of your personal data within that time. In some cases, however, particularly if your request is more complex, more time may be required up to a maximum of three months from the date we receive your request. You will be kept fully informed of our progress.

13. **How Do You Contact Us?**

To contact us about anything to do with your personal data and data protection, including to make a subject access request, please use the following details, for the attention of our administrator Fiona Stiff:

Email address: hello@commonchange.uk

Telephone number: 0300 302 3033.

14. **How Do We Use Cookies?**

Our websites may place and access certain first-party Cookies on your computer or device. First-party Cookies are those placed directly by us and are used only by us. We use Cookies to facilitate and improve your experience of our websites and to provide and improve our services. We have carefully chosen these Cookies and have taken steps to ensure that your privacy and personal data is protected and respected at all times.

By using our websites, you may also receive certain third-party Cookies on your computer or device. Third-party Cookies are those placed by websites, services, and/or parties other than us. These Cookies are not integral to the functioning of our websites and your use and experience of our websites will not be impaired by refusing consent to them.

All Cookies used by and on our websites are used in accordance with current Cookie Law.

Before Cookies are placed on your computer or device, you will be shown a prompt requesting your consent to set those Cookies. By giving your consent to the placing of Cookies you are enabling us to provide the best possible experience and service to you. You may, if you wish, deny consent to the placing of Cookies; however certain features of our websites may not function fully or as intended.

Certain features of our websites depend on Cookies to function. Cookie Law deems these Cookies to be "strictly necessary". Your consent will not be sought to place these Cookies, but it is still important that you are aware of them. You may still block these Cookies by changing your web browser's settings as detailed below, but please be aware that our websites may not work properly if you do so. We have taken great care to ensure that your privacy is not at risk by allowing them.

15. **Changes to this Privacy Policy**

We may change this Privacy Policy from time to time. This may be necessary, for example, if the law changes, or if we change our business in a way that affects personal data protection.

Any changes will be immediately posted on **commonchange.uk**

This Privacy Policy was last updated on 14/08/23.