

## Privacy Policy

**Skateistan is committed to respecting and protecting your data and privacy.**

### 1. What is Skateistan?

Skateistan is an international non-governmental organisation which empowers children through skateboarding and education. We were founded as an NGO in Kabul in 2009 and we currently operate in Afghanistan, Cambodia and South Africa. Our Headquarters are in Berlin, Germany and we have fundraising entities in the USA, Netherlands, Germany and the UK. Our registration details are:

Skateistan International: Skateistan Gemeinnützige GmbH HRB143259 B

Germany: Skateistan e.V. Steuernummer: 47025/13601

USA: Skateistan USA 501c3 EIN number: 27-0729804

Netherlands: Stichting Skateistan NL KvK: 68169310

UK: Skateistan UK Registered charity number: 1147956 Registered company number: 7941695

### 2. Data Protection

Your personal data is protected by the EU legislation, the General Data Protection Regulation, which came into force on 25 May 2018. This policy was updated in July 2018 to reflect the requirements of GDPR.

This Privacy Policy outlines how we collect, use and store personal information when using our website. Personal data is all data that can be related to you personally, e.g. name, address, e-mail addresses, user behaviour.

The person responsible pursuant to Art. 4 para. 7 of the Basic EU Data Protection Regulation (DS-GVO) is Skateistan, Oppelnerstrasse 29, Berlin-Kreuzberg, 10997, Germany. If you have any questions about how Skateistan processes your information or you would like to change the way we communicate with you, you can contact us in the following ways:

- Email: [dataprotection@skateistan.org](mailto:dataprotection@skateistan.org)
- Phone (Berlin office): +49 (30) 914 92101
- Post: Data Protection Officer, Skateistan, Oppelnerstrasse 29, Berlin-Kreuzberg, 10997, Germany

When you contact us by email or via a contact form, the data you provide us (your email address, possibly your name and telephone number) will be stored by us in order to answer your questions. We will delete the data that arises in this context after it is no longer required to be stored, or restrict processing if there are legal storage obligations.

If we use contracted service providers for individual functions of our offer or use your data for advertising purposes, we will inform you below in detail about the respective processes. We will also specify the criteria for the storage period.

We may change this Policy from time to time so please check this page occasionally to ensure that you're up to date with any changes. By using our website, you're agreeing to be bound by this Policy.

### **3. What information do we collect from you?**

If you only use the website for information purposes, i.e. if you do not register or otherwise provide us with information, we only collect the personal data that your browser transmits to our server. If you wish to view our website, we collect the following data, which is technically necessary for us to display our website to you and to guarantee stability and security (legal basis is Art. 6 Para. 1 S. 1 lit. f DS-GVO):

- IP address
- Date and time of the request
- Time zone difference to Greenwich Mean Time (GMT)
- Contents of the request (concrete page)
- Access status/HTTP status code
- Amount of data transferred in each case
- Website from which the request originates
- Browser
- Operating system and its interface
- Language and version of the browser software.

In addition to the purely informational use of our website, we offer various services that you can use if you are interested. For this purpose, you must usually provide further personal data which we use to provide the respective service and to which the aforementioned data processing principles apply.

This information may include, but is not limited to, the following:

- Your contact details such as name, postal address, phone number and email address
- Your date of birth
- If you are supporting us financially; your financial information such as bank account details
- A record of our communications with you
- Your communication preferences
- Your donation history
- Your interests and reasons for your support.

To some extent, we use external service providers to process your data. These have been carefully selected and commissioned by us, are bound by our instructions and are checked regularly.

Furthermore, we may pass on your personal data to third parties if we offer participation in promotions, competitions, contracts or similar services together with partners. You will receive further information on this when you enter your personal data or in the description of the offer below.

If our service providers or partners are based in a country outside the European Economic Area (EEA), they are obliged to comply with European Law in regards to the way they manage and store your data.

#### **4. How do we collect this information?**

We will obtain personal information directly from you in a number of ways when you interact with Skateistan, for example when you:

- Subscribe to our email newsletter
- Make a donation
- Enquire to volunteer or submit a job application
- Attend an event
- Fundraise for us
- Communicate with us online, in writing or over the phone.

We may also obtain your personal information indirectly, for example when you:

- Make a donation to us through other websites like Just Giving, Virgin Money giving, Facebook, PayPal, Benevity, Crowdrise or Betterplace.
- Sign up to hear from us through other websites like Facebook, Instagram, Twitter or LinkedIn.

These independent third parties will only share your information with us when you give consent. These organisations operate according to their own Data Protection Policies. You should ensure you are familiar with their policies before you interact with them.

#### **5. How is your information used?**

We collect this information in order to process your requests and keep in touch with you about our work. Examples include:

- To process donations
- To send communications in line with the preferences you have told us about that may be of interest to you, such as fundraising appeals and supporter newsletters
- To record any contact we have with you to help us provide you with the most appropriate communications
- To process volunteering enquiries or job applications
- To check that your communications preferences are up to date
- To ensure that the content from our website is presented effectively for you and your digital device.

#### **6. Your consent**

Skateistan's fundraising activity helps us to raise the funds which enable us to empower vulnerable children through skateboarding and education programs.

We will seek your consent to send you marketing messages via email and occasionally, by telephone. If you choose to hear from us in this way, you may receive email updates about our work and from time to time, requests for donations.

Skateistan may occasionally use a legitimate interest basis to send you relevant marketing and fundraising communications by post, if you have provided a postal address. Unless you tell us not to, we may contact you by post with communications we believe you'll be interested in. If you would like

to opt out of these communications, you can let us know at any time by contacting us at the details found at the start of this Policy.

This legal ground for processing means that we can process your personal information if we have a genuine and legitimate reason for doing so, and that reason is not overridden by your rights and interests as an individual.

Here are some examples of legitimate processing:

- For fundraising purposes: to process your donations where you have asked us to do so, and to send you marketing communications.
- For administration purposes: to provide you with information about any fundraising activities you have agreed to take part in, and to follow up with you about your enquiry.
- To conduct research: such as supporter satisfaction research, to invite you to take part in surveys to improve our services, or to conduct desk research to help identify high value supporters.
- To analyse data: to improve our services, understand our supporters and to tailor our marketing communications to you.

We have considered and balanced our legitimate interests against individuals' privacy rights in these scenarios and we do not believe that any adversely affect our supporters' rights or interests. If you would like to find out more or ask us to stop processing your data in these ways, you can do this at any time by contacting us at the details found at the start of this Policy.

#### **7. Use of blog functions**

In our blog, in which we publish various articles on topics related to our activities, we currently do not have the facility for readers to make public comments. Should this change in the future, your comment will be published with your username. We recommend using a pseudonym instead of your username. It is necessary to provide your username and e-mail address, all other information is voluntary. If you make a comment, we will continue to store your IP address, which we will delete after one week. The storage is necessary for us to be able to defend ourselves against liability claims in cases of a possible publication of illegal content. We need your email address in order to contact you if a third party should object to your comment as unlawful. Legal bases are art. 6 para. 1 sentence 1 lit. b and f GDPR. The comments will not be checked before publication. We reserve the right to delete comments if they are objected to as unlawful by third parties.

#### **8. Use of our web shop**

If you would like to order in our web shop, it is necessary for the conclusion of the contract that you enter your personal data, which we need for the processing of your order. Mandatory information required for the processing of contracts is marked separately, further information is voluntary. We process the data provided by you in order to process your order. For this purpose we can pass on your payment data to our house bank. The legal basis for this is art. 6 para. 1 sentence 1 lit. b GDPR

You can voluntarily create a customer account through which we can store your data for later further purchases. When you create an account under "My Account", the data you provide will be stored revocably. You can always delete all other data, including your user account, in the customer area. We may also process the data you provide in order to inform you about other interesting products from our portfolio or to send you emails with technical information.

We are obliged by commercial and tax law to store your address, payment and order data for a period of ten years. However, after two years we will restrict processing, i.e. your data will only be used to comply with legal obligations.

To prevent unauthorised access by third parties to your personal data, in particular financial data, the ordering process is encrypted using TLS technology.

## **9. Data retention**

We retain personal information for different periods of time depending on your relationship with Skateistan and the legal requirements pertaining to types of information. For example, there is a legal requirement to retain some types of financial information for up to seven years after your last interaction with us.

We will keep some data indefinitely (for example, your basic personal details like your name and giving history). We may use these details to exclude you from future marketing activities. It is also important for us to retain a record of donations should we receive a legacy gift in a Will many years later.

Sometimes this legacy is left many years after the supporter's last interaction with us. It can be important for us to know that the individual was a supporter in the past in case the Will is contested.

If you decide you no longer wish to hear from us, we'll need to keep a note of that on our suppression list indefinitely.

If you'd like more information on our retention policy, please contact us.

## **10. Data storage**

Skateistan is aware that countries outside the European Economic Area have differing approaches to data privacy laws and that enforcement may not be as robust as it is within Europe's borders.

If we work with organisations that process data outside the EU, we ensure data security is in line with the law. International organisations we work with who process data have verified their data processing standards at a minimum meet the EU-US Privacy Shield which sets out clear safeguards and transparency responsibilities for US-based organisations processing data from EU citizens.

## **11. Data sharing**

We will never exchange or sell your personal information to another organisation for their marketing purposes.

We may also 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 or otherwise to protect the rights, property or safety of individuals.

We may also use other companies to provide services and process your personal data on our behalf including delivering post, sending emails, making telephone calls and processing credit card payments. We will only provide those companies with the information they need to deliver the specific service and ensure that your data is treated with respect and integrity.

In these situations, the relationship between Skateistan and the third-party data processor will be governed by a contract and strict security requirements will be in place to protect your personal information.

## **12. Analysing your information**

It's important for us to know why you choose to support Skateistan as this helps us to give you the information that is most relevant for you. We'll analyse your data in order to better understand your preferences and to improve our communications to you.

In some instances, we may add publicly available information to our analysis. This might include information that is contained in the Companies House or Charity Commission Registers, press and web articles and LinkedIn.

Skateistan also carries out click-through email tracking, which allows us to analyse when an email has been interacted with (e.g. opened or when links within it are clicked). This helps us to better understand the impact of our communications and success of our campaigns.

## **13. Your data protection rights**

When we use your personal information on the basis of your consent, you have the right to withdraw that consent at any time. You also have the right to ask us to stop using your personal information for direct marketing purposes. Simply [contact us](#) at the contact details found at the top of this Policy and we will amend your contact preferences.

Presuming that these rights are not overridden by our legal obligations, or where our legitimate interests are not overridden by your rights and interests as an individual, you have the following data protection rights:

### **Right to be Informed**

You have the right to be told how your personal information will be used. This policy document and shorter summary statements used on our communications are intended to be a clear and transparent description of how your data may be used.

### **Right of Access**

You can contact us about what information we hold on you and to request a copy of that information. We have 30 days to comply once we are satisfied you have rights to see the requested records and we have successfully confirmed your identity.

### **Right of Erasure**

You have the right 'to be forgotten' (i.e. to have your personally identifiable data deleted). We'll be required to keep an appropriate record (such as a suppression list) so that we can make sure you don't receive future communications. In some instances a legal basis will override the right to erasure. An example of this would be the legal requirement to record financial transactions for six years.

### **Right of Rectification**

If you believe our records are inaccurate you have the right to ask for those records concerning you to be updated.

### **Right to Restrict Processing**

In certain situations you have the right to ask for processing of your personal data to be restricted because there is some disagreement about its accuracy or legitimate usage.

#### Right to Object to direct marketing

You have an absolute right to stop the processing of your personal data for direct marketing purposes.

#### Right to object to automated decisions

In a situation where a data controller is using your personal data in a computerised model or algorithm to make decisions that have a legal effect on you, you have the right to object. This right is more applicable to mortgage or finance situations; Skateistan does not undertake complex computerised decision-making that produces legal effects.

#### Right to data transferability

You have the right to receive the personal data that you have provided to us in a structured, common and machine-readable format and to have this data transmitted by us to another responsible person without hindrance.

If you want to exercise any of these rights, please contact us using the contact details at the top of this policy.

#### **14. If you are dissatisfied:**

- Please talk to us directly so we can help resolve any problem or query. You can contact us using the contact details at the top of this policy.
- You also have the right to complain to a data protection supervisory authority about the processing of your personal data by us, e.g. the local office for data protection issues:

Berliner Beauftragte fuer Datenschutz und Informationsfreiheit

(<https://www.datenschutz-berlin.de//index.html> or +49 (0)30 13889 777).

#### **15. Our Use of Cookies**

Our website uses ‘cookies’ as most sites do. Cookies are small packets of data that are stored on your hard drive assigned to the browser you are using and through which certain information flows to the location that sets the cookie (here by us). Cookies cannot execute programs or transmit viruses to your computer. They serve to make the website more user-friendly and effective.

Cookies help us to identify information such as how many people are using our website and what devices they are using. This allows us to improve our site for the people who use it.

You can choose how your browser handles cookies or turn them off entirely by changing your browser settings. This may affect how you see our website and how well it works for you.

The website [www.aboutcookies.org](http://www.aboutcookies.org) has useful information on how to manage cookies in your browser.

By using this site you give consent to our use of cookies.

This website uses the following types of cookies, the scope and functionality of which are explained below:

- Transient cookies

- Persistent cookies.

Transient cookies are automatically deleted when you close your browser. These include in particular session cookies. They store a so-called session ID, which can be used to assign various requests from your browser to the shared session. This enables your computer to be recognised when you return to our website. The session cookies are deleted when you log out or close your browser.

Persistent cookies are automatically deleted after a specified period, which may vary depending on the cookie. You can delete cookies at any time in the security settings of your browser.

You can configure your browser settings according to your wishes and, for example, refuse to accept third-party cookies or all cookies. We would like to point out that you may not be able to use all the functions of this website.

We use cookies to identify you for subsequent visits if you have an account with us. Otherwise, you will have to log in again for each visit.

#### **16. Objection or revocation against the processing of your data**

If you have given your consent to the processing of your data, you can revoke it at any time. Such a revocation influences the permissibility of the processing of your personal data after you have given it to us.

Insofar as we base the processing of your personal data on a weighing of interests, you may object to the processing. This is the case if the processing is in particular not necessary for the fulfilment of a contract with you, which is described by us in the following description of the functions. In the event of such an objection, we ask you to explain the reasons why we should not process your personal data as we have done. In the event of your justified objection, we will examine the situation and either discontinue or adapt the data processing or point out our compelling reasons worthy of protection on the basis of which we will continue the processing.

You may of course object to the processing of your personal data for advertising and data analysis purposes at any time. You can inform us about your advertising objection under the following contact data:

Skateistan, Oppelnerstrasse 29, Berlin-Kreuzberg, 10997, Germany or

[dataprotection@skateistan.org](mailto:dataprotection@skateistan.org).