



Privacy and Cookie Policy

S0001

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1. Introduction

Salvus Charity is committed to protecting your personal information and being transparent about what we do with it, no matter how you interact with us. That's whether you want to work, volunteer or advocate for us, donate, buy goods or use our services, want information, training or want to learn more about what we do.

We are committed to using your personal information in accordance with our responsibilities. We are required to provide you with the following information under the European Union General Data Protection Regulation (Regulation (EU) 2016/679) ('GDPR').

We won't do anything with your information you wouldn't reasonably expect. Transparency is at the core of what we do.

2. About us

Processing of your personal information is carried out by or on behalf of Salvus Charity, based in Cluj-Napoca, Romania and registered in the NGO National Register of the Ministry of Justice under no. 22755/A/2017 and in the Associations and Foundations' Register (Cluj-Napoca Municipal Court) under no. 51/2017, CIF 37090533.

The legal phrase that's used to describe an organisation that makes these decisions is 'data controller'.

Salvus Charity is a non-profit legal person, a non-governmental organization independent of political parties, state organisms and other such entities. Salvus Charity carries out its activity according to the legislation in force, its memorandum of association and its statute.

3. What information we collect from you

3.1. Name and contact details

When you engage with us by phone, mail, in person or online, we may collect information about you (referred to in this Privacy Policy as 'personal information'). This may include your name, address, email address, telephone number, date of birth, job title and details of your education and career, why you are interested in Salvus Charity, and other information relating to you personally which you may choose to provide to us.

3.2. Digital data

3.2.1. Social media

Salvus Charity uses social media to promote the causes we support. We have accounts on Facebook, Twitter, LinkedIn and Instagram. When you interact with us on these social media platforms we may also obtain some personal information about you. The information we receive will depend on the privacy preferences you have set on each platform and the privacy policies of each platform. To change your settings on these platforms, please refer to their privacy notices.

We collect donations through PayPal and may collect donations through Facebook Fundraisers or Facebook Donate. Where members of the public engage with our posts or publish content relevant to our work, we may like the posts, follow them, reply or write to them. We conduct research on what people say on public social media platforms to better understand how people feel about our sector and to improve our work. This research may be done by staff or companies we work with.

3.2.2. Our website

When you browse our website, we collect some cookie information regarding your use of the website, and this is used to help our website work well and to track information about how people are using it. Cookie information can include your IP address, the browser you're using and your language settings. The IP address allows your computer to communicate over the internet and connect to our website and it can also show us where in the world you're browsing from.

3.2.3. Our office and premisses

If you visit our offices, we may collect video, audio and still images via security cameras located in public areas such as entrances and hallways.

3.2.4. Payment data

If you use your credit or debit card to donate to us, we will use a specialist payment processor (PayPal). We will also ensure that card details are handled securely under Payment Card Industry (PCI) Data Security Standards. For more information about these Standards see here: https://www.pcisecuritystandards.org/security_standards/index.php.

Please do not send an email containing any credit or debit card details, since it will be immediately deleted and no payment will be taken. If this happens, we'll let you know.

All donations should be completed through the donation page on our website (www.salvuscharity.org) or via bank transfer. When you perform a bank transfer your payment details are supplied directly to Banca Transilvania.

Other tracking technologies are sometimes used, for example, a web beacon or tracking URL. These technologies can be used to retrieve information from your device such as your operating system, or help us understand from which website you have been referred (e.g. Google). These are wholly referred to as 'Cookies' and are detailed below.

3.3. Sensitive personal data

'Sensitive' or 'special category' personal data is information revealing racial or ethnic origin, religious or philosophical beliefs and political opinions, trade union membership, genetic or biometric data, information concerning health or data concerning a person's sex life or sexual orientation.

We do not usually collect 'sensitive personal data' about our supporters unless there is a clear reason for doing so, such as participation in a fundraising event or where we need this information to ensure that we provide appropriate facilities or medical support to enable you to safely participate. We may also collect sensitive personal data if you make the information public.

We will always make it clear when we collect this information from you what sensitive personal data we are collecting and why.

This is a simple overview of the information we collect from you. If you'd like to know more, further information is available below.

3.4. Young persons' personal data

If you're aged under 18, you must get your parent / guardian's permission before you provide any personal information to us. Our website is not intended for use by young persons aged under 18 and we do not knowingly collect data on young persons.

4. Why we collect your personal data and what we do with it

We collect your personal details to help us improve the lives of people in need in Romania.

We use your personal information to:

- to have effective communications and fundraising activity
- provide you with information you've asked us for;
- provide further information about our work and activities;
- allow you to purchase goods;
- process your donations;

- further our charitable aims, including for fundraising activities;
- research the impact and effectiveness of our work;
- register and administer your participation in events you've registered for;
- administer and keep our website safe and secure and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes;
- improve your interactions with our website, for example by making sure that content is presented in the most relevant and effective manner for you and for your computer/mobile device;
- report on the results and impact of our work and events;
- analyse and improve our work, activities or information (including our website) or for our internal records;
- use IP addresses and monitor website use to identify locations, block disruptive use, record website traffic or personalise the way information is presented to you;
- process your application for a job or volunteer role with us;
- training and/or quality control;
- audit and/or administer our accounts;
- satisfy legal obligations which are binding on us, for example arising from contracts entered into between you and us or in relation to regulatory, government and/or law enforcement bodies with whom we may work;
- prevent fraud, misuse of services or money laundering and to perform due diligence in respect of larger donations;
- communicate with you in any other way; and
- for the establishment, defence and/or enforcement of legal claims.

Furthermore, if you have opted-in when making your enquiry, we will send you marketing materials such as our monthly newsletter that details promotions, special offers and discounted rates. Depending on your preferences, we may send you further correspondence from time to time.

The CCTV images collected at our offices are used for business security, health and safety and fraud monitoring. We collect this data to comply with our insurance obligations and to keep our premises and data safe. CCTV data is stored for 10 days unless required for criminal or insurance investigations in which case it's held for as long as necessary to fulfil that investigation.

We will retain data for no longer than necessary for the purposes for which it was collected, taking into account guidance issued by the ANSPDCP (the National Supervisory Authority For Personal Data Processing).

5. Who we share your personal data with

We will only use your information for the purposes for which it was obtained. We will not, under any circumstances, sell or share your personal information with any third party for their own purposes, and you will not receive marketing from any other companies, charities or other organisations as a result of giving your details to us.

We will only share your data for the following purposes:

- Third party suppliers: We may need to share your information with data hosting providers or service providers who help us to deliver our services, projects, or fundraising activities and appeals. These providers will only act under our instruction and are subject to pre-contract scrutiny and contractual obligations containing strict data protection clauses.
- Where legally required: We will comply with requests where disclosure is required by law, for example, we may disclose your personal information to the government for tax investigation purposes, or to law enforcement agencies for the prevention and detection of crime. We may also share your information with the emergency services if we reasonably think there is a risk of serious harm or abuse to you or someone else.

We always aim to ensure that personal information is only used by those third parties for lawful purposes in accordance with this Privacy Policy.

6. International transfers of information

Your information is normally kept within Romania or within the European Economic Area (EEA) and this is a priority for Salvus Charity when selecting where we host and use your information.

On some occasions, we may have to use the services of a supplier outside the EEA, which means that your personal information is transferred, processed and stored outside the EEA. You should be aware that, in general, legal protection for personal information in countries outside the EEA may not be equivalent to the level of protection provided in the EEA.

However, when this occurs, we will only ever use highly reputable suppliers that have contractual clauses about the high standard of data processing, and meet all requirements that your information is looked after to a standard as if it were in the EEA. If and when this occurs, usually this is a company in the USA.

When we transfer your personal information and process it in the USA, we do so in accordance with the EU-U.S. Privacy Shield Framework and the European Commission approved standard contractual clauses. By submitting your personal information to us you agree to this transfer, storing or processing at a location outside the EEA.

7. Legal bases for processing personal data

The law requires us to set out the lawful grounds on which we collect and process your personal information as described in this Policy. Depending on the purposes for which we use your data, one or more of the grounds listed below may be relevant:

7.1. Legitimate Interest

We rely on the “legitimate interest” ground for processing where we believe it is in the legitimate interests of you, as the data subject, or of the Salvus Charity, to process your data. When we process your personal information in this way, we also consider and balance any potential impact on you (both positive and negative), and your rights under data protection laws. We will not use your personal information for activities where our interests are overridden by the impact on you, for example where collection and use of your information would be excessively intrusive (unless, for instance, we are otherwise required or permitted to by law). We will only use your information in accordance with the purposes described in this Policy. Examples of processing based on the legitimate interests ground are:

- Sending direct marketing material to supporters by post for fundraising purposes;
- Conducting research to better understand who our supporters are and better target our fundraising activity;
- Measure and understand how our audiences respond to a variety of marketing activity so we can ensure our activity is well targeted, relevant and effective;
- Taking and using photos and/or films of event participants and attendees;
- Administering events;
- Sending relevant communications to your work email address;
- Staff recruitment and taking applications for volunteers and contacting volunteers about their role;
- The use of CCTV recording equipment in and around our premises for monitoring and security purposes; and
- Promoting Salvus Charity on social media, Google, YouTube and other online platforms.

7.2. Consent

In many instances, we will rely on obtaining your consent to our use of your personal information in a certain way (for example, asking for your consent to use your personal information to send you direct marketing information, and we may ask for your explicit consent to share sensitive personal information with us).

7.3. Legal Obligation

We may need to collect, process and disclose personal information to comply with a legal obligation. For example, where we are ordered by a court or regulatory authority or accounting/tax purposes.

7.4. Performance of a contract

For example if you agree to work for us, we need to be able to process your information for the purpose of meeting our contractual obligations. Or if you volunteer with us then we will keep information about you to ensure we provide you with the best volunteer experience we can.

8. How you can control your data

You have the right to access and to review the personal data we hold for you. You can request an overview of this data by emailing info@salvuscharity.org. When emailing, please write 'Personal information request' in the subject line so we're able to expedite the process, together with copies of two separate identification documents which provide photo identification and confirm your address, such as a passport, driving licence, or utility bill. More information about your rights can be found below.

9. How we protect your data

We use technical and corporate organisational safeguards to ensure that your personal information is secure. We limit access to information on a need-to-know basis and take appropriate measures to ensure that our people are aware that such information is only used in accordance with this Privacy Policy.

We undertake regular reviews of who has access to information that we hold to ensure that your information is only accessible by appropriately trained staff, volunteers and contractors.

10. Your data rights

As a user of our service, you have rights as an individual which you can exercise in relation to the information we hold about you.

10.1. Right to be informed

You have a right to be informed in a clear, transparent and easily understandable way about how we use your personal information and about your rights. This is why we are providing you

with the information in this policy. If you require any further information about how we use your personal information, please let us know.

10.2. Right of access

You can request access to your personal information by making a 'Personal information request'. We can tell you what information we hold about you, why we are holding it and who it may be shared with. If it's been shared, this will only have been with a property that you have made a reservation with. Further to this, you may request a full copy of the personal information we hold for you which we will send to you.

10.3. Right of rectification

If you believe our records of your personal information are inaccurate, you have the right to ask us to update those records. You can also ask us to check the personal information that we hold about you if you are unsure whether it is up to date or not.

10.4. Right of erasure

At your request we will delete your personal information from our records. We will only retain your data if we're under a legal obligation to do so or we need to keep it to establish, exercise or defend a legal claim, and you will always be informed in these scenarios.

10.5. Right to restrict processing

You have the right to ask us to restrict the processing of your personal information if there is disagreement about its accuracy or whether our use is legitimate or not. We only use your data to process your reservation and if you request us to restrict processing then this will take place after your reservation and stay has been completed. Further to this, if you feel your data has been processed incorrectly or unfairly then you have the right to object to the processing of this data.

10.6. Right to data portability

If you want us to transfer your personal information to another party where you provided it to us and we are using it based on your consent, or to carry out a contract with you, and we process it using automated means, you can ask us to do so.

10.7. Rights related to automated decision-making

Where we take automated decisions in relation to your personal information with no human involvement you have the right to ask us for human intervention or to challenge any such decision.

10.8. Right to object

You have the right to object to processing where we are: (i) processing your personal information on the basis of the legitimate interests ground and we have no compelling reason we can demonstrate to continue with that processing; (ii) using your personal information for direct marketing, or; (iii) using your personal information for statistical purposes.

In the limited circumstances where we are relying on your consent (as opposed to the other bases set out above) to the collection, processing and transfer of your personal information for a specific purpose, you have the right to withdraw your consent for that specific processing at any time. Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose or purposes you originally agreed to, unless we have another compelling legitimate interest in doing so.

You can do any of the above by emailing info@salvuscharity.org.

If you think that we are using your information in a way which breaches data protection law, you have the right to lodge a complaint with the relevant national data protection supervisory authority (see below).

11. Privacy policies of other websites

The Salvus Charity website contains links to other websites. Our privacy policy applies only to our website, so if you click on a link to another website, you should read their privacy policy.

12. Changes to this policy

Our privacy policy may change without notice. The current version was updated April 2020.

13. How to contact us

For any further information you can contact us:

- By email at: info@salvuscharity.org
- By phone on: see phone numbers on website <https://salvuscharity.org/contact-us>

- Or write to us at Salvus Charity, 24 Iuliu Maniu Street, Ap.1, 400095 Cluj-Napoca, Cluj, Romania

14. How to contact the appropriate authority

Should you wish to report a complaint or if you feel that Salvus Charity has not addressed your concern in a satisfactory manner, you may contact ANSPDCP (the National Supervisory Authority For Personal Data Processing - <https://www.dataprotection.ro/>):

- By email at: anspdcp@dataprotection.ro
- By phone on: + 40 (0)318 059 211
- Or write at: ANSPDCP, 28-30 G-ral Gheorghe Magheru Bld., District 1, 010336 Bucharest, Romania

15. How we contact you

15.1. Marketing

It is always your choice as to whether you want to receive information about our work, how we raise funds and the ways you can get involved. If you do not want us to continue to contact you, you have the right to object or change your mind at any time. You may opt-out of our marketing communications at any time by clicking the 'unsubscribe' link in at the end of our marketing emails or by telephoning us and letting us know.

15.2. During a fundraising appeal

We may also contact you during a fundraising appeal to either ask you whether you would like to contribute, or if you have already done so, to simply give you an update which we reasonably think may be of interest to you. Please be assured that we will not spam you and such communications will be aligned to the consent you have given us.

15.3. Business to Business

If we think you can help our causes then we may reach out to ask you to support our causes directly with goods or services. If you receive communication from us and don't wish to receive more, then simply hit the 'Unsubscribe' button at the bottom of the email.

16. Cookies

16.1. What are cookies?

Our website uses cookies for various web functions, and to help improve the user experience.

A cookie is a small data file stored on your computer that comes from the web browser you're using. It can have a variety of uses and functionalities including storing information about your preferences, speeding up your searches and recognising you when you re-visit. Cookies are also used to track overall visits and visitor location. This helps us identify visitor numbers and patterns.

Some cookies have a session-limited lifespan and are removed when you close your browser; whereas permanent cookies last a lot longer and sometimes indefinitely.

16.2. Types of cookies

We use the following cookies:

- Strictly necessary cookies. These are cookies that are required for the operation of parts of our websites. They include, for example, cookies that enable you to log into secure areas of our websites or make use of reservations services. Strictly necessary cookies do not require consent as they provide functionality as requested by the browser.
- Performance cookies. They allow us to recognise and count the number of visitors to our web pages and see how these visitors navigate around our site. This helps us to improve the way our website works by optimising our page layouts, search tools and general usability.
- Functionality cookies. These are used to recognise when you return to our websites in the future. This enables us to personalise our content for you, greet you by your name and remember your preferences such as language settings and time zone.
- Targeting cookies. These cookies record your visit to our websites, the pages you have visited and the links you have followed. We will use this information to make our websites and the advertising we display more relevant to your interests.

16.3. How to manage cookies

Most internet browsers automatically accept cookies unless you change your browser settings. If you wish to restrict, block or delete the cookies which are set by any websites, you can generally do this through your browser settings. These settings are usually found in the 'options' or 'preferences' menu of your internet browser.

Please note however that if you set your internet browser preferences to block all cookies, you may not be able to access all or parts of our website.

If you would like to read more information about cookies, or would like to find out about how to disable them, please visit <http://www.aboutcookies.org/>

If you would like more information about the specific cookies our website uses, please contact info@salvuscharity.org.