


<h1>Privacy Policy</h1>			
Effective Date	1 January 2019		
Accountable Department	All m2m entities		
Policy Number	CORP_12_v02_2018	Version	2
Applicability	Employees, partners, donors, volunteers, advocates, suppliers, those who make payments to m2m, and those who request information from m2m.		

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I. PURPOSE

mothers2mothers (m2m) as the data controller (under the EU General Data Protection Regulation) or the responsible party (under the South Africa Protection of Personal Information Act) is committed to both protecting your personal information (as defined in the Protection of Personal Information Act, No 4 of 2013 as amended) and being transparent about its usage. This policy covers m2m employees, partners, donors, volunteers, advocates, suppliers, those who make payments to m2m, and those who contact us or request information from us.

This policy reflects m2m's commitment to protecting your personal information and highlights how personal information is collected and used.

Please note that we may update this Policy from time to time by posting the latest version on m2m's website, please ensure that you refer to it periodically.

In this Privacy Policy, reference to "Personal Data" is as defined in the General Data Protection Regulation (GDPR) and reference to "Personal Information" is as defined in the Protection of Personal Information Act (POPIA). Reference to "Data Controller" is as defined in the GDPR and reference to "Responsible Party" is as defined in POPIA.

II. WHAT INFORMATION m2m MAY COLLECT

m2m collects and maintains different types of information including:

- Non-personal information such as web pages accessed, and social media sites visited. This helps m2m determine how many people visit our website and social channels on a regular basis, and how popular these channels are. This information does not tell m2m anything about who you are or where you live. It simply allows m2m to monitor and improve services. Please see m2m's "cookies" policy for further information.
- Personal information including your name, contact information (postal address, phone number, email address), identity/passport number, education and employment history, and date of birth (where appropriate). In certain circumstances, outlined in the Major Gifts section below, m2m may collect further information about you that can be found in the public domain, including profession and interests.
- Payment information, including credit card number and expiration date, and billing information.

III. HOW DOES m2m USE THIS INFORMATION?

m2m uses your information for a variety of reasons including to:

- Fulfil your requests – for example, making donations, attendance at events, participation in campaigns and research, and provision of information.
- Record m2m's engagement with you so that we can be as effective as possible in future engagements with you.
- Comply with all charity and NGO laws and other regulations.
- Handle orders, deliver products, and communicate with you about orders, where appropriate.
- Provide you with information if you have agreed to receive it or that m2m thinks may be of interest to you as outlined in our marketing section below.
- Communicate with you regarding events.
- Send you our newsletters which you have subscribed to receive.
- Create an account on our careers portal or when you apply for employment.

Marketing:

From 25 May 2018, m2m operates an opt-in only policy with regards to mass marketing. This means that m2m will only send you marketing materials if you have specifically agreed to receive them, and m2m will only share it with you in the methods that you have indicated. Marketing material refers to automated, mass invitations to events, m2m newsletters, and information about m2m campaigns and appeals.

If you would like to receive m2m marketing materials but have not opted-in, you can do so by emailing info@m2m.org or by calling: +44 (0)203 867 7120 or +27 (0) 21 466 9160.

Processing Payments:

As outlined above, m2m will use your payment information to process donations and payments made to m2m. Any credit card and account number information collected will be disposed of immediately following the successful processing of a payment.

Major Gifts:

m2m may carry out research to determine the potential of an individual or a juristic person to become a regular donor or a member of our Global Giving Circle. Areas that m2m may research include profession, charitable interests, and propensity to support m2m. You can opt-out of this research at any time by contacting m2m using the information provided in Paragraph IX below.

m2m uses publicly available data, from reputable sources, where an individual may expect their information to be publicly available. This may include data from Companies House or CIPC, corporate and charity websites, media coverage, and business due diligence websites.

IV. HOW DOES m2m GET INFORMATION?

Most of the information we process is provided to us directly by you for a variety of reasons, including your wish to attend, or have attended, an event, you subscribe to our newsletter, you have donated to us, you wish to fundraise or partner with us or you have applied for a job.

m2m also receives personal information through research to determine the potential of an individual to become a regular donor or a member of our Global Giving Circle from other donors.

We may automatically collect and store certain information about you when you visit our website. For example, technical information, including your Internet Protocol (IP) address and information about your use of our website including details of your visits such as pages viewed.

V. SHARING INFORMATION

m2m may disclose your information (including Personal Information) to third-party service providers. Our service providers may not use or disclose your Personal Data or Personal Information for any purpose other than providing the services on our behalf. For example, m2m may use the services of external vendors/consultants to carry out relevant research to determine the potential of an individual to become a regular donor or a member of our Global Giving Circle.

Where m2m shares your Personal Data, m2m ensures such vendors are GDPR and POPIA compliant in the manner in which m2m uses Personal Data with and from such third parties within the European Union (EU) and South Africa.

Where m2m shares your Personal Information, m2m will require the service providers to take appropriate, reasonable, technical and organisational measures to keep your Personal Information secure.

m2m may also disclose your Personal Information:

- when you consent to disclosure;
- when such disclosure is necessary to protect the legitimate interests (safety, property or other rights) of m2m, our directors, employees, consultants, or any other person (for example in cases of suspected fraud or defamation);
- when such disclosure is necessary to protect your legitimate interests;
- where required or permitted by law;
- required or requested to by a regulator or law enforcement;
- when under a duty to disclose or share your Personal Information to comply with any legal obligation;
- if necessary to carry out actions for the performance of a contract to which you are a party; or
- If you have made a Gift Aid declaration in the UK, m2m may disclose the information you have provided as part of the declaration to Her Majesty's Revenue and Customs (HMRC) to reclaim Gift Aid on your donation.

There is a possibility that your Personal Information may be transferred to, and stored at, a destination outside of your country of residence (for example, by a third-party data hosting service provider or to our offices in the UK).

VI. HOW DOES m2m PROTECT YOUR INFORMATION?

- m2m will not sell your personal information.
- m2m will take all appropriate, reasonable, technical, and organisational measures to safeguard your Personal Information to prevent the loss of, damage to or unauthorised destruction or unlawful access to or processing of Personal Information provided to m2m.
- Our website does not store personal information when it is entered into one of our contact preference forms — it links directly to our secure global database.
- m2m uses Secure Sockets Layer (SSL) technology to protect against the loss, misuse, and unauthorised access to and alteration of the information under our control. Unfortunately, the transmission of information via the Internet is not always completely secure. Although m2m makes every effort to protect personal information, m2m cannot guarantee the security of personal information transmitted to m2m. Any transmission of personal information is at your own risk. m2m is not responsible for circumvention of any privacy settings or security measures m2m employs for your protection.
- m2m may send communications to you by email. E-mail is not a fully secure means of communication, and while m2m makes every effort to keep systems and communications protected m2m cannot guarantee the security of such communications.
- m2m makes no representations about any other websites, and when you access any other website through a link on our website (including social media sites) you should understand that it is an independent site and that m2m has no control over that website or the manner in which your personal information is collected through those websites. Those websites may have their own privacy policies and m2m encourages you to review those policies or contact the website operators directly to understand how your personal information is used.
- Security measures may not prevent all losses and m2m is not responsible for any damages or liabilities relating to security failures.

VII. STORING AND RETAINING YOUR DATA

m2m stores your data on a secure private server. As m2m is a global organisation, our Customer Relationship Management system is a global cloud-based database and is held on a secure third-

party server. This database is secured and there are multi-faceted protection levels to ensure the safety of your Personal Data and Personal Information. Therefore, your data may be accessed by m2m employees outside of the country in which you live to send global communications (such as newsletters) and to perform research.

Only personal information such as your name, contact details, donation information, and notes regarding our relationship and our contact with you is stored on this system. No credit or debit card information is stored on this system and is never transferred outside of the country where you have provided it.

Information may also be held on secure computers in the country in which your donation originated. m2m may also store information in paper files for which adequate security measures are in place to ensure the security of this data.

In respect to financial transactions, m2m maintains your personal information for as long as the law requires for tax or accounting purposes.

In respect of other personal information, m2m will retain it for no longer than is necessary for achieving the purposes for which it was collected, taking into account m2m's Privacy Policy and guidance or regulations issued by governments applicable to m2m.

VIII. WHAT ARE YOUR RIGHTS?

The GDPR provides you with certain rights over your data and how m2m uses it. These include the right to:

- Access the personal information m2m holds about you, known as a **subject access request**;
- Object to or restrict the processing of your personal information;
- Object to your information being used for marketing purposes;
- Rectify your personal information if you believe it is incorrect;
- Request the deletion/erasure of your personal information. Please note that in certain circumstances m2m may need to retain your data for a specified period to comply with our legal obligations, for example with regards to financial transactions;
- If you are in the UK, you may make a complaint to the Information Commissioner's Office via www.ico.org.uk.

POPIA is South Africa's Protection of Personal Information Act. POPIA aims to promote the protection of personal information processed by public and private bodies by, among others, introducing certain conditions for the lawful processing of personal information to establish minimum requirements for the processing of such information.

POPIA provides you certain rights over your personal information and how m2m uses it. These include the right to:

- Access the personal information m2m holds about you;
- Object to the processing of your personal information;
- Object to your information being used for marketing purposes;
- Rectify your personal information if you believe it is incorrect;
- Request the deletion of your personal information. Please note that in certain circumstances m2m may need to retain your data for a specified period to comply with our legal obligations, for example with regards to financial transactions.
- If you are in South Africa, you may make a complaint to the Information Regulator's Office via <https://www.justice.gov.za/inforeg/contact.html>

The Information Regulator is, among others, empowered to monitor and enforce compliance by public and private bodies with the provisions of POPIA. You have the right to lodge a complaint to the Information Regulator.

For enquiries or information, please contact:

The Information Regulator (South Africa)

Street Address: 33 Hoofd Street Forum III, 3rd Floor Braampark
 Postal Address: P.O Box 31533 Braamfontein, Johannesburg, 2017
 Email: inforeg@justice.gov.za
 Website: <http://www.justice.gov.za/inforeg/>

IX. GETTING IN TOUCH

For any questions about m2m's Privacy Policy, including if you wish to exercise any of your rights as outlined above, please contact us via any of the following methods:

United Kingdom:

mothers2mothers UK

For the attention of Data Protection Officer – Charlotte Gellatly

Email: privacy@m2m.org

Phone: +44 (0) 203 867 7120

Postal and Street Address: Unit 21 St Mark's Studios, 14 Chillingworth Road, London, N78QJ, United Kingdom

South Africa:

For the attention of Information Officer - Sarah Sheldon
 mothers2mothers South Africa NPC

Postal Address: P.O. Box 841, Cape Town, South Africa 8001

Street Address: 33 Martin Hammerschlag Way, 5th Floor, Foreshore, Cape Town, South Africa 8001

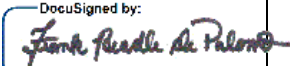
Phone: +27 (0) 21 466 9160

Fax: +27 (0) 86 661 4912

E-mail: sarah.sheldon@m2m.org or info@m2m.org

This policy was last updated on the date of signature below. m2m regularly reviews this policy and may make relevant amendments from time to time. Please visit this page regularly to check for any specific updates.

Approved and Reviewed by:

Name	Title/Department	Signature	Date
Frank Beadle de Palomo	President & Chief Executive Officer		Jun 22, 2021