



**Northern Lines CIO**  
**Working Name: The Javaad Alipoor Company**

## **Privacy Policy**

### Privacy commitment

The Javaad Alipoor Company (JAC) is committed to protecting your privacy. We will use the information that we collect about you in accordance with, the Privacy and Electronic Communications Regulations 2003, the Data Protection Act 2018 (DPA) and the General Data Protection Regulation (GDPR).

JAC is the working name of Northern Lines CIO registered in England and Wales, number 1169480. This Privacy Policy explains how we treat your personal information which is collected while you use this website, subscribe to our mailing list or make a donation.

### Personal Data

Across our operations the personal information that we collect can include:

- If you subscribe to our mailing list - name and email address
- If you make a donation via text message - amount, phone number, and name / postal address (if you tell our provider you are eligible for give aid).
- If you make a donation via PayPal - amount, and if you opt in PayPal also shares your name and email address.
- If you use our website - details of visits to the website including traffic data, location data, operating system, browser usage, and the resources that you access.

Data Protection gives organisations a number of different conditions to allow us to process your information lawfully. Below we have listed why we use your Personal Data and what our legal grounds are.

- To provide you with information about products and services and fundraising activities which may be of interest to you;
  - We use the legal grounds 'consent' for this marketing activity
- To process donations and gift aid;
  - We use the legal grounds 'necessary for a contract' for the core processing of the donation
  - We also use the grounds 'compliance with a legal obligation' for any mandatory reporting to HMRC such as in relation to gift aid

### Sharing Data

We use a third party called donor.com for donations by text message. They process the payment on our behalf, and if you follow the link to claim Gift Aid they also collect your name and address to facilitate this. We will receive a record of your first name, location (to town / city level), network provider, phone number and the date and time of the donation.

For donations by Paypal, you can donate anonymously or you opt in to share your name and email address with us. We'll also get details of the amount, date and time of the donation, plus if you opt in to Gift Aid we'll get the amount paid.

We use Mailchimp to collect subscriber information and to send out our newsletters, which keeps you up to date about our artistic activities, fundraising initiatives and other news. Each e-mail we send you offers you the opportunity to unsubscribe from these preferences, or you can ask us to do this by e-mailing [sarah@javaadalipoor.co.uk](mailto:sarah@javaadalipoor.co.uk)

We may also share your data with;

- The police and other crime protection and detection agencies or regulatory bodies, in order to comply with any legal obligation.
- Our legal or other professional advisors
- Regulators such as the Charity Commission or the Information Commissioner's Officer
- Funding bodies, particularly Arts Council of England, who may use anonymised Personal Data to understand the impact of the public investment made in JAC

### Transfers

As a small charity, we do use third party providers for a lot of our systems. This includes US companies such as Mailchimp. Where we do transfer Personal Data to a place deemed to have lower standards than the GDPR, we'll put in place Standard Contractual Clauses which contractually commits the provider to UK standards.

### Giving you control

You have the right to obtain a copy of all your Personal Data.

If you would like to revise the information provided to us at any time, or feel what we currently have on record is incorrect, let us know and we'll update it.

If you want us to stop using your Personal Data, restrict our use of it, or delete it please let us know. We'll do what we can, but sometimes we'll need to keep your data to comply with our legal obligations.

From time to time we may ask you for further information in order to update our records or for particular purposes. We will always tell you how we will use any further information received from you.

To make any request, please e-mail [sarah@javaadalipoor.co.uk](mailto:sarah@javaadalipoor.co.uk)

You also have the right to lodge a complaint with the supervisory authority, The Information Commissioner's Office – [www.ico.org.uk](http://www.ico.org.uk)

### How long we will keep your information

We will keep your information only for as long as is reasonably necessary for the purposes set out in this privacy policy and to fulfil our legal obligations. We will not keep more information than we need.

This policy may change from time to time so please check it periodically. This update is current as from February 2021.

If you have any queries regarding this policy please get in touch with Sarah Kingswell

E-mail: [sarah@javaadalipoor.co.uk](mailto:sarah@javaadalipoor.co.uk)

Phone: 02920 353070

Website: [www.javaadalipoor.co.uk](http://www.javaadalipoor.co.uk)