



Data Privacy Policy

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1 Introduction

This document outlines **Mango Ethical Direct Marketing Ltd.** (Mango) Data Privacy Policy.

2 Data Privacy Policy

2.1 Purpose

The purpose of this policy is to state the Mango Direct Marketing's position on data privacy and to provide information and guidance on recognising and dealing with all aspects of data privacy in line with the Data Protection act of 1998.

2.2 Scope

This policy covers all employees including those on temporary and fixed term contracts, external resources, agents, distributors, consultants, standards committee members, business partners and any other person or organisation who performs services for or on behalf of Mango Direct Marketing Ltd in any location around the world.

2.3 Policy

As is the core value of Mango Direct Marketing Ltd, integrity is a key value. It is a Mango policy to maintain the highest standards of data privacy in all our business dealings worldwide.

3 Data Protection Fundamentals

3.1 Introduction

Mango Ethical Direct Marketing Ltd. needs to collect and use information about the Data Subjects who we come into contact with, in order to carry on our work. This information must be collected and dealt with appropriately— whether on paper, electronically, or recorded on other material - and there are safeguards to ensure this under the Data Protection Act 1998.

3.2 Data Controller

Mango Ethical Direct Marketing Ltd. is the Data Controller under the Act and will determine what purposes the information held will be used for. It is also responsible for notifying the Information Commissioner of the data it holds or is likely to hold, and the general purposes that this data will be used for.

3.3 Disclosure

Mango Ethical Direct Marketing Ltd. is unlikely to share data with other organisations, but in circumstances where this is required, the Data Subject will be made aware how and with whom their information will be shared. There are circumstances where the law allows Mango Ethical Direct Marketing Ltd. to disclose data without the data subject's consent; these are:

1. Carrying out a legal duty as authorised by an appropriate legal officer
2. The Data Subject has already made the information public
3. Conducting any legal proceedings, obtaining legal advice, or defending any legal rights

Mango Ethical Direct Marketing Ltd places great importance on the correct treatment of personal information as a key element in the success of our working relationships, and in maintaining the confidence of those with whom we deal. Mango Ethical Direct Marketing Ltd intends to ensure that personal information is treated lawfully and correctly.

To this end Mango Ethical Direct Marketing Ltd will adhere to the Principles of the Data Protection Act 1998.

Specifically, the Principles require that personal information:

- shall be processed fairly and lawfully and, in particular, shall not be processed unless specific conditions are met,
- shall be obtained only for one or more of the purposes specified in the Act, and shall not be processed in any manner incompatible with that purpose or those purposes,
- shall be adequate, relevant, and not excessive in relation to those purpose(s)
- shall be accurate and, where necessary, kept up to date,
- shall not be kept for longer than is necessary
- shall be processed in accordance with the rights of data subjects under the Act,
- shall be kept secure by the Data Controller who takes appropriate technical and other measures to prevent unauthorised or unlawful processing or accidental loss or destruction of, or damage to, personal information,
- shall not be transferred to a country or territory outside the European Economic Area unless that country or territory ensures an adequate level of protection for the rights and freedoms of data subjects in relation to the processing of personal information.

Mango Direct Marketing Ltd will, through appropriate management, strict application of criteria and controls:

- observe fully conditions regarding the fair collection and use of information,
- meet its legal obligations to specify the purposes for which information is used,
- collect and process appropriate information, and only to the extent that it is needed to fulfil its operational needs or to comply with any legal requirements,
- ensure the quality of information used,
- ensure that the rights of people about whom information is held, can be fully exercised under the Act. These include:
 - the right to be informed that processing is being undertaken,
 - the right of access to one's personal information
 - the right to prevent processing in certain circumstances and
 - the right to correct, rectify, block or erase information which is regarded as wrong information
- take appropriate technical and organisational security measures to safeguard personal information,

- ensure that personal information is not transferred abroad without suitable safeguards,
- treat people justly and fairly whatever their age, religion, disability, gender, sexual orientation, or ethnicity when dealing with requests for information,
- set out clear procedures for responding to requests for information.

3.4 Data Collection

Informed consent

Informed consent is when

- a Data Subject clearly understands why their information is needed, who it will be shared with, the possible consequences of them agreeing or refusing the proposed use of the data
- and then gives their consent.

Mango Direct Marketing Ltd will ensure that data is collected within the boundaries defined in this policy. This applies to data that is collected in person, or by completing a form.

When collecting data, Mango Direct Marketing Ltd will ensure that the Data Subject

- clearly understands why the information is needed
- understands what it will be used for and what the consequences are should the Data Subject decide not to give consent to processing
- as far as reasonably possible, grants explicit consent, either written or verbal for data to be processed
- is, as far as reasonably practicable, competent enough to give consent and has given so freely without any duress
- has received sufficient information on why their data is needed and how it will be used

3.5 Data Storage

Information and records relating to service users will be stored securely and will only be accessible to authorised staff.

Information will be stored for only as long as it is needed or required statute and will be disposed of appropriately.

It is Mango Ethical Direct Marketing Ltd.'s responsibility to ensure all personal and company data is non-recoverable from any computer system previously used within the organisation which has been passed on/sold to a third party.

3.6 Data Access and Accuracy

All Data Subjects have the right to access the information Mango Ethical Direct Marketing Ltd holds about them. Mango Ethical Direct Marketing Ltd will also take reasonable steps to ensure that this information is kept up to date by asking data subjects whether there have been any changes.

In addition, Mango Ethical Direct Marketing Ltd will ensure that:

1. it has a Data Protection Officer with specific responsibility for ensuring compliance with Data Protection
2. everyone processing personal information understands that they are contractually responsible for following good data protection practice,
3. everyone processing personal information is appropriately trained to do so,
4. everyone processing personal information is appropriately supervised,
5. anybody wanting to make enquiries about handling personal information knows what to do,
6. it deals promptly and courteously with any enquiries about handling personal information,
7. it describes clearly how it handles personal information,
8. it will regularly review and audit the way it holds, manages, and uses personal Information
9. it regularly assesses and evaluates its methods and performance in relation to handling personal information
10. all staff are aware that a breach of the rules and procedures identified in this policy may lead to disciplinary action being taken against them

This policy will be updated as necessary to reflect best practice in data management, security, and control and to ensure compliance with any changes or amendments made to the Data Protection Act 1998.

In case of any queries or questions in relation to this policy please contact the Mango Ethical Direct Marketing Ltd Data Protection Officer.

The following list below of definitions of the technical terms it has used is intended to aid understanding of this policy.

Data Controller – The person who (either alone or with others) decides what personal information the Mango Direct Marketing Ltd will hold and how it will be held or used.

Data Protection Act 1998 – The UK legislation that provides a framework for responsible behaviour by those using personal information.

Data Protection Officer – The person responsible for ensuring that it follows its data protection policy and complies with the Data Protection Act 1998 is Gary McClean

Data Subject/Service User – The individual whose personal information is being held or processed by a Mango Direct Marketing Ltd (for example: a client, an employee)

'Explicit' consent – is a freely given, specific and informed agreement by a Data Subject (see definition) to the processing* of personal information* about her/him. Explicit consent is needed for processing sensitive* data* See definition

Notification – Notifying the Information Commissioner about the data processing activities of Mango Direct Marketing Ltd as certain activities may be exempt from notification.

Information Commissioner – The UK Information Commissioner responsible for implementing and overseeing the Data Protection Act 1998.

Processing – means collecting, amending, handling, storing, or disclosing personal information

Personal Information – Information about living individuals that enables them to be identified – e.g., name and address. It does not apply to information about companies and agencies but applies to named persons or employees within Mango Direct Marketing Ltd.

Sensitive data – means data about:

- Racial or ethnic origin
- Political opinions
- Religious or similar beliefs
- Trade union membership
- Physical or mental health
- Sexual life
- Criminal record
- Criminal proceedings relating to a data subject's offences

4 Data Privacy Fundamentals

4.1 Introduction

Mango Direct Marketing Ltd. hold and process data on behalf of current and previous clients. The data will be client customer and donor data, going forward it will be termed 'Client Data'.

Mango Direct Marketing Ltd. are identified in client contract for services as the primary data controllers of that client's data.

We take the data protection rights and our legal obligations seriously. Client data will be treated in a secure and confidential manner and only as set out below or otherwise notified to the client in writing.

This Data Privacy Policy describes the categories of client data we collect, how client data is processed, for what purposes we process client data and how client privacy is safeguarded in the course of our relationship. It is intended to comply with our obligations to provide the client with information about our processing of their data under privacy laws.

If a client has any questions regarding the processing of their data; if they believe privacy rights have been violated; or if they are aware of an unauthorised use or disclosure of data, they can contact their associated contact within Mango.

4.2 What Personal Data Do We Process?

Personal data means any information describing or relating to an identified or identifiable individual. An identifiable individual is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural, or social identity of that individual.

We collect various types of personal data for a client for the purposes described below

Personal details: name, gender, date of birth, personal contact details (e.g. address, telephone or mobile number, e-mail).

Other data related to the call; credit card, debit card, start date, expiry date, cv2, Bic, Iban, marketing opt in and opt out, media, number dialled, amount, direct debit dates, product name

4.3 How does the company collect data?

The Company mainly collects data over the telephone. Information is provided on the call directly to our agents and electronically stored in real-time. Other data sources are email and SMS. The former detail is stored in Microsoft 365 while the latter is processed automatically into a database for retention and outbound call back.

In some circumstances, data is collected indirectly from telephony systems using IVR and stored as an encrypted voice recording.

All call data is also stored as an encrypted voice recording.

4.4 Retention of Data

The Company ensures that client data is processed and retained within a secure environment and that stored data is accurate. Excessive data can be deleted or made anonymous as soon as reasonably practicable or under a 'Right To Be Forgotten' submitted by the client.

We generally retain client data for as long as is required to satisfy the purpose for which it was collected. Customised data retention policy's can be created at the start of any campaign to expedite the deprecation process based on the instruction within the policy.

4.5 Disclosure of Data

Client data is only accessible to processors at initial data capture time and to IT in order that data may be passed back to clients for their own processing.

Data is passed to third parties associated with the client for that specific campaign in order they may carry out their own processing. This may be fulfilment or marketing.

4.6 Security of Data

The Company is committed to protecting the security of the client data. The Company uses a variety of technical and organisational methods to secure client data in accordance with applicable laws.

4.7 Client Rights as a Data Subject

Clients have the right to request corrections and delete their data.

Clients have the right to request access to any of their data that the Company may hold, and to request correction of any inaccurate data relating to them. They furthermore have the right to request deletion of any irrelevant data we hold outside of their retention policy.

5 Notice of Changes

Should we change our approach to data protection\data privacy, the client will be informed of these changes or made aware that we have updated the Data Privacy Policy

Clients will know which information we process and how we use this information.

This Data Privacy Policy was last updated and reviewed in January 2021.