
Privacy Policy

Summary

SeeBeyondBorders is committed to respecting your privacy and we will treat personal information you share with us with utmost care. We hold just the personal information about you that allows us to carry out the services we provide to you. Primarily, we will use personal information such as your name and address and contact details, to provide you with information about what work we are doing, update you about fundraising activities, and process donations or payments where we have a lawful basis to do so (see 'Uses Made of the Information' for further details).

If you are an employee or are coming with us to Cambodia on a programme, we may have other relevant information that we have asked for and you have given us.

We commit to treating your personal data in a way that we would expect our own personal data to be treated. You have the right to ask us not to use personal information about you to send you marketing materials, at any time by contacting info@seebeyondborders.org.

Thank you for your support of SeeBeyondBorders. Please see the full policy document below for comprehensive details about the collection, processing and protection of your personal data. If you have any questions, please do not hesitate to contact us and ask.

Please see www.seebeyondborders.org for details about getting in touch.

Policy

SeeBeyondBorders is committed to protecting and respecting your privacy and details are set out in this Privacy Policy ("the Policy"). SeeBeyondBorders is an organisation that aims to improve the quality of teaching and learning in Cambodian primary schools.

In this Policy, whenever you see the words 'We', 'Us' or 'Our', it refers to all SeeBeyondBorders entities, i.e. SeeBeyondBorders Australia (and SeeBeyondBorders Cambodia as a branch of SeeBeyondBorders Australia), SeeBeyondBorders UK and SeeBeyondBorders Ireland.

This Policy sets out the basis on which any personal data We collect from you, or that you provide to Us, will be processed by Us. Please read the following carefully to understand Our views and practices regarding your personal data and how We will treat it.

The lawful bases upon which we process your data are:

- Your consent (which you are entitled to withdraw at any time)
- Performance of a contract between you and us
- Legitimate interests of SeeBeyondBorders – this means where we have an interest in processing your information to carry out our business where this does not interfere with your rights.

For the purpose of the Data Protection Act 1998 (the **UK Act**) and the *General Data Protection Regulation (Regulation (EU) 2016/679)* (GDPR) which came into force in May 2018, the data controller is SeeBeyondBorders UK (charity number 1146044 and company number 07912198) whose registered office is at 31 Sistova Road, London, SW12 9QR.

For the purpose of the Australian Privacy Act 1988 (the **Privacy Act**) the data controller is SeeBeyondBorders Australia (ABN13 159193638) whose registered office is at Suite 106, 1-3 Gurrigal Street, Mosman, NSW, 2088.

For the purpose of the Irish Data Protection Act 2018 (the **Irish Act**) the data controller is SeeBeyondBorders Ireland (company number 666381) whose registered office is at 31 Woodlands, Portmarnock, County Dublin, D13YN34.

INFORMATION WE COLLECT FROM YOU

We will collect and process the following data about you:

Information you give Us. This is information about you that you give Us by filling in forms on Our site www.seebeyondborders.org (**'Our site'**) or by corresponding with Us by phone, e-mail or otherwise. It includes information you provide when you contact Us through Our site, subscribe to Our newsletter, make a donation, participate in volunteer or project visit events and when you report a problem with Our site.

The information you give Us may include your name, address, e-mail address and phone number, postal address, financial and credit card information, and tax status.

If you are an employee or a volunteer visiting Cambodia, the information you give Us may also include sensitive information including criminal record history or health information (such as any health conditions you suffer from, health care records, medical history, medical/health treatment you are seeking, health insurance fund memberships) but only when you voluntarily give it to Us.

The collection of this personal information is required to enable Us to provide the services to you and to ensure the quality of service provision. Individuals do not have to supply Us with their personal or sensitive information, however, if you choose not to do so We may be unable to provide the services required or sought.

Information We collect about you. With regard to each of your visits to Our site We may automatically collect the following information:

- Information about your visit, including the full Uniform Resource Locators (URL), clickstream to, through and from Our site (including date and time), number of times you have visited Our site, where you were when you accessed Our site, length of visits to certain pages, and page interaction information (such as scrolling, clicks, and mouse-overs).

We will only collect personal information that is reasonably necessary to enhance your use of the Website and to enable us to provide the services on the Website.

Information We receive from other sources. This is information We receive about you from third parties who We are working closely with (including, for example, business partners, sub-contractors in technical, payment and delivery services, advertising networks, analytics providers, search information providers, and in exceptional and relevant circumstances, credit reference and security vetting agencies). We will only receive information from third parties when you have indicated that you wish to support SeeBeyondBorders and with your consent (for example from a donation site, such as JustGiving, VirginMoneyGiving, Global Giving, The Big Give, iDonate, Benjojo or Benevity, or a payment services provider such as Stripe or PayPal). It is your responsibility to check the third party's Privacy Policy when you provide your information to understand fully how they will process your data. This data can include information such as your name, postal address, email address, phone number, your geographic location (for mobile devices), credit/debit card details and tax status.

Depending on your settings or the privacy policies for social media and messaging services like Facebook, WhatsApp or Twitter, you might give Us permission to access information from those accounts or services.

We will always:

- Ensure information is relevant to the purpose of collection
- Ensure the information is collected in a fair way, without unreasonable intrusion
- Keep information as up to date and complete as possible

USES MADE OF THE INFORMATION

We use information held about you in the following ways:

Information you give to Us. We process your information in the following ways:

- to carry out Our obligations arising from any contracts entered into between you and Us, to process your donations, for Our internal administrative purposes, and where We need to take steps to protect Our network security or risk of fraud;
- if you have agreed to it, to provide you with information about other activities We implement that are similar to those that you have already supported or enquired about;
- to provide you with information about any of Our activities that We feel may interest you, for marketing and fundraising purposes. If you are in the UK or the EU We will only contact you by electronic means (e-mail or SMS) if you have consented to this, as per the GDPR. If you do not want Us to use your data in this way, please let Us know by emailing info@seebeyondborders.org.
- to help identify you
- to support Our marketing and information services
- to fulfil your requests – such as applications for donations, competition entries, participation in campaigns and provision of information
- to process sales transactions, donations, or other payments and verify financial transactions
- to identify visitors and contributors
- to provide a personalised service to you when you visit Our websites – this could include customising the content and/or layout of Our pages for individual users
- to record any contact We have with you
- to prevent or detect fraud or abuses of Our websites and enable third parties to carry out technical, logistical or other functions on Our behalf
- to carry out research on the demographics, interests and behaviour of Our users and supporters to help Us gain a better understanding of them and to enable Us to improve Our service. This research may be carried out internally by Our employees or We may ask another company to do this work for Us
- to carry out credit rating checks, which would only occur in exceptional and relevant circumstances
- to communicate with Our supporters and donors
- to enable Us to comply with employee/employer legislation
- to comply with tax legislation in various jurisdictions.

Information We receive from other sources. We will combine this information with information you give to Us and information We collect about you. We will use this information and the combined information for the purposes set out above given particular circumstances.

DISCLOSURE OF YOUR INFORMATION

We may share your information with others in certain circumstances, which would include the following:

- Any SeeBeyondBorders entity which may include Our Australian, UK, Irish and/or Cambodian operations.
- We may not always have the necessary resources and therefore We may use an email service provider (e.g. Mailchimp). In these cases We need to provide them with your name and email address.
- If We are legally required to do so, which would include requests from government bodies and law enforcement agencies
- If We are taking action to protect Our intellectual property or in cases of fraud being suspected
- Credit reference agencies for the purpose of assessing your credit score where this is a condition of Us entering into a contract with you which we would see as only

occurring in exceptional and relevant circumstances which you would be fully aware of at the time.

- Vetting reference agencies for the purpose of assessing your criminal background where this is a condition of Us entering into a contract with you

For the avoidance of doubt, We never provide any third parties with your personal data for their own marketing purposes.

SeeBeyondBorders will honour the confidentiality of programme participants, staff, volunteers, sponsors, donors and supporters. We agree to consider information pertaining to social and medical conditions, family situations, and other facts of a highly sensitive nature as confidential. Such information will not be disclosed to any person who is not authorised to have access to this information without the specific permission of the individual concerned or where the disclosure is authorised by law.

WHERE WE STORE YOUR PERSONAL DATA

The data that We collect from you will sometimes be processed at a destination outside the European Economic Area ("EEA") and outside Australia, due to cloud-based servers being located across the world. It will also be processed by staff who work for Us in the UK, Ireland, Australia or Cambodia. This includes staff engaged in, among other things, the processing of your donation(s), management of events, marketing campaigns and the provision of support services. All staff have signed our Code of Conduct in which they agree to abide by all SeeBeyondBorders Policies, which includes the confidentiality of personal data. By submitting your personal data, you agree to this transfer, storing or processing. SeeBeyondBorders will take all steps reasonably necessary to ensure that appropriate safeguards are in place so that your data is treated securely and in accordance with this Policy and the relevant legislation. Our appropriate safeguards include Standard Contractual Clauses in place between each SeeBeyondBorders entity to protect international transfers of personal data, and a data protection declaration of understanding signed by individual staff members.

For complete transparency, We have provided a list of IT tools that We use and where the servers for these tools are located¹:

- Salesforce: All information you provide to Us is stored on Our secure Customer Relationship Management database, Salesforce, and your data is stored on Salesforce servers in Japan. Your personal data is protected through Standard Contractual Clauses in Our agreement with Salesforce.
- Mailchimp: We use Mailchimp for Our email marketing campaigns, and as such your name and email address is stored on Mailchimp servers which are located in the US². Mailchimp contractually commits to transfer and process all user data in compliance with the Standard Contractual Clauses which are outlined in the Data Processing Addendum that we have accepted.
- Xero: All financial transactions are recorded in our secure financial database, Xero, which uses a top tier, third party data hosting provider (Amazon Web Services) with servers located in the US to host online services. Data security is their top priority and they constantly monitor the privacy regulatory and legislative landscape to adhere to evolving requirements. Any payment transactions will be encrypted using SSL technology.
- Google Drive: Occasionally, your personal data is stored on Our secure servers on Google Drive. Google stores this data on its servers in the USA.
- Civica Involve Ltd: We use Civica to store and analyse programme data for

¹ Information correct in January 2021. These third parties may change the data storage location at any time but all privacy controls will remain in place. SeeBeyondBorders cannot be held responsible for changes made by the third parties listed above.

² For UK and EEA based individuals, your data is only stored on Mailchimp if you have given consent for us to hold this data.

monitoring and evaluation purposes. This is a data platform with end-to-end encryption and full compliance with GDPR and the Australian Privacy Act. Civica stores data on its servers in Australia.

Unfortunately, the transmission of information via the Internet is not completely secure. Although We will do Our best to protect your personal data, We cannot guarantee the security of your data transmitted to Our site; any transmission is at your own risk. Once We have received your information, We will use strict procedures and security features to try to prevent unauthorised access and we will only use third parties that have appropriate safeguards in place

Please contact us immediately if you become aware of or have reason to believe there has been any unauthorised use of your personal information.

HOW LONG WE KEEP YOUR PERSONAL DATA

We do not keep data for longer than is necessary for the purpose it has been collected and used. To ensure this is the case, We review your information regularly to determine whether it remains relevant and seek to update it if it is not. The criteria We use for determining whether it is necessary to retain your information includes whether you:

- have advised that you do not want to be included in marketing activities
- continue to be a donor
- continue to be an employee
- your involvement with SeeBeyondBorders continues or has ceased

Where information is no longer relevant, or if you ask Us to do so, We may delete your information We hold.

If We become aware of someone showing signs of vulnerability, either by being informed or if We suspect it to be the case, We may delete that person's information and no longer include them in any fund raising activity.

We are required to retain certain information for accounting, audit and tax purposes; such information will be retained for as long as legislation requires.

COOKIES

Our website uses cookies to distinguish you from other users of Our website. This helps Us to provide you with a good experience when you browse Our website and also allows Us to improve Our site. For detailed information on the cookies We use and the purposes for which We use them please see [Our Cookies Policy, which is appended to this Policy.](#)

YOUR RIGHTS

You have the right to ask Us not to process your personal data for marketing purposes. We will usually inform you (before collecting your data) if We intend to use your data for such purposes or if We intend to disclose your information to any third party for such purposes. You can exercise your right to prevent such processing by checking certain boxes on the forms We use to collect your data. You can also exercise the right at any time by contacting Us at info@seebeyondborders.org.

Our site may, from time to time, contain links to and from the websites of Our partners, sponsors and supporters. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that We do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites.

You have several rights under GDPR and other relevant law regarding your data, including rights relating to:

- request access to, deletion of or correction of, your personal data
- request your personal data be transferred to another person
- complain to Us or escalate this complaint to a supervisory authority

Any subject access requests or data transfer requests can be made in writing to info@seebeyondborders.org and We will respond within 5 working days.

MANDATORY DATA BREACH NOTIFICATIONS

Since 22 February 2018, the Privacy Act in Australia has required Us to notify you and the Australian Information Commissioner if we suspect that a data breach (relating to Your personal and / or sensitive information) has occurred and there is real risk of serious harm to you as a result of the breach.

In the UK and Ireland, the General Data Protection Regulations that came into force on 25th May 2018 require Us to notify you and the Information Commissioner's Office (UK) or the Data Protection Commission (Ireland) within 72 hours of a data breach occurring if the breach is likely to result in a high risk to your rights and freedoms.

CHANGES TO OUR PRIVACY POLICY

Any changes We make to Our Policy in the future will be posted on this web-page. Please check back frequently to see any updates or changes to Our privacy Policy.

MAKING A COMPLAINT

If you have any concerns about how We manage your personal information, you may write to any of the addresses above or email to our Privacy Officer at info@seebeyondborders.org. We will reasonably endeavour to provide a response within 30 days of receipt of your complaint.

If you are not satisfied with Our response, and you are in Australia, you may lodge a complaint with the Office of the Australian Information Commissioner (**OAIC**) by writing to the OAIC at GPO Box 5218, Sydney NSW 2001. For further information about the OAIC, please visit www.oaic.gov.au.

If you are not satisfied with Our response, and you are in the UK, you may lodge a complaint with The Information Commissioner's Office (**ICO**) by telephoning their helpline on 0303 123 1113. For further information about the ICO, please visit <https://ico.org.uk>.

If you are not satisfied with Our response, and you are in Ireland, you may lodge a complaint with the Data Protection Commission through their online form available here: <https://forms.dataprotection.ie/contact>.

CONTACT

Questions, comments and requests regarding this Policy are welcomed and should be addressed to info@seebeyondborders.org.

POLICY MANAGEMENT

This Policy has been approved by the Australian Board and the Trustees of SeeBeyondBorders' other entities as noted below.

Amendments and or developments will be recommended to the Board from time to time as deemed appropriate by senior management. Formal reviews are recommended within three years from the anniversary date of approval by the Board. Recommendations for minor changes can be approved by the CEO before the Board review every three years, and recommendations for changes to the background or policy in practice can be approved by the relevant Sub-Committee

Doc ref	Doc type	Approved by Australian Board Date	Minute ref.	Approved by UK Trustees Date	Minute ref	Approved by Irish Board Date	Minute ref
	Policy Review	Board 21 Feb 2017				N/A	N/A
5350007 13/v1	Policy Review	Board 27 Mar 2018	10	24 Apr 2018			
PandCP/01/2022/1.0	Policy Update	Board Jan 2022	5				

Appendix 1 – Cookies Policy

The SeeBeyondBorders' entities referred to in the first page of this of the Privacy Policy ("Us", "We", or "Our") uses cookies on Our website (www.seebeyondborders.org) (the "Service"). By using the Service, you consent to the use of cookies.

Our Cookies Policy explains what cookies are, how We use cookies, how third-parties We may partner with may use cookies on the Service, your choices regarding cookies and further information about cookies.

What are cookies?

Cookies are text files placed on your computer to monitor how you use Our website. We use them to improve Our website and to help provide you with a good experience. The type of information We collect may include your internet service provider's name and details about the pages you accessed. None of the cookies used on Our website collect personally identifiable information about you.

We may, at one time or another, use three different types of cookies on Our website:

- Session cookies that are deleted after each visit
- Persistent cookies that remain in place across multiple visits to Our sites
- Third party cookies that are used by Our approved business partners.

How SeeBeyondBorders uses cookies

When you use and access the Service, We may place a number of cookies files in your web browser. When you access Our website, We will ask you whether you want to accept Cookies or not.

We use cookies for the following purposes: to enable certain functions of the Service, to provide analytics, and to store your preferences.

We may also use:

- Big data analytics – This cookie enables Us to access all web traffic to help Us improve your browsing experience on Our site.
- Big data conversion code – Our website may use conversion code tracking to establish whether an advertisement has driven an enquiry.
- Data capture – The enquiry forms within Our website capture a user's data prior to form submission. This is so We can further improve the user journey and also perform a customer service call (if needed) to ensure the user had obtained all of the information required from Our website.

Third-party cookies

In addition to Our own cookies, We may also use various third-parties cookies to report usage statistics of the Service, deliver advertisements on and through the Service, and so on.

What are your choices regarding cookies

You can set your browser not to accept cookies and the websites listed below tell you how to remove cookies from your browser. You can also visit the help pages of your web browser for more information.

Please note, however, that if you delete cookies or refuse to accept them, the usability of Our website may be reduced, you may not be able to store your preferences, and some of Our pages might not display properly.

Where can you find more information about cookies

You can learn more about cookies and the following third-party websites:

- All About Cookies: <http://www.allaboutcookies.org/>
- About Cookies: <http://www.aboutcookies.org>

About Us

This website is owned and operated by SeeBeyondBorders Australia, ABN 13 159 193 638. The registered office address is Suite 106, 1-3 Gurrigal Street, Mosman, NSW 2088, Australia.

We are contactable by the following means:

Email: info@seebeyondborders.org

Tel: +61 (0)2 9960 7077

Post: Suite 106, 1-3 Gurrigal Street, Mosman, NSW 2088, Australia

For enquiries relating to the UK or Ireland, Our contact details are as follows:

UK Email: uk@seebeyondborders.org

UK Tel: +44 (0)7910 145210

UK Post: 31 Sistova Road, London, SW12 9QR

Ireland Email: info@seebeyondborders.org

Ireland Tel: +353 (0)86 375 6554

Ireland Post: 31 Woodlands, Portmarnock, Co. Dublin, D13YN34

Last Updated: 10th January 2022