

# **Privacy Policy**

| Document Control   |                          |
|--------------------|--------------------------|
| Approved by:       | MannionDaniels Directors |
| Responsible Owner: | Operations Team          |
| Created:           | 10 January 2017          |
| Revised:           | 10 January 2023          |
| Approved:          | 10 January 2023          |
| Next Review:       | 10 January 2024          |
| Version:           | 1                        |

This privacy policy applies only to the actions of MannionDaniels and Users with respect to this website. It does not extend to any websites that can be accessed from this website.

#### Introduction

Mannion Daniels Limited works for a more healthy, equitable, inclusive, safe and sustainable world. We provide advice and support in policy, strategic planning, governance and programme management, with a particular focus on international health and social care. Mannion Daniels Limited is a registered company in the United Kingdom, the company number is 4105827.

If you have any questions regarding our privacy policy, you can phone, email us or write to:

The Data Protection Officer
MannionDaniels Limited
Universal House
1-2 Queen's Parade Place
Bath, BA1 2NN
operationsandcompliance@manniondaniels.com

Tel: +44(0)1225 421153

We are committed to safeguarding the privacy of our website visitors and treat your personal information appropriately. This privacy and cookie policy is in place to ensure your personal information is appropriately protected.

We keep our privacy notice under regular review. This privacy notice was last updated on 21 May 2019 and will be reviewed again no later than May 2020.

# Personal information collection

For the purposes of the Data Protection Act 1998 (DPA) and General Data Protection Regulation (GDPR), MannionDaniels is the "data controller".

We collect certain information or data about you when you call us, email us and use our services. This includes;

- Questions, queries or feedback you leave, including your email address or telephone number if you contact us
- Information about your use of our website services including what pages you visited, how long you visited the website for
- Information that you provide for the purpose of registering and accessing our services including names, address, organisational data, email and telephone numbers.
- Information that you provide for the purpose of subscribing to the website services.

The general categories of personal information that we may collect for the aforementioned purposes are as follows:



- Name
- Address
- Contact phone number
- Email address.

When you register with us, you are agreeing that you are over 18 years of age or are acting with parental consent.

### **Using personal information**

We may use your personal information to;

- Administer and personalise this website for you
- Enable your access to and use of the website services
- Publish information about you on the website, providing you have given specific consent to do so
- Send you updates and notifications relating to our services
- · Send you news and communications about the services you have expressed an interest in
- Use your email address for survey purposes via a third party organisation.

# Lawful basis

Under the GDPR (General Data Protection Regulation) we control your personal information about you electronically using the following lawful bases:

- **Consent**: through certain actions such as when you browse our website or ask us to provide you with further information you provide your consent to us to process information that may be personal information. This can be done by entering our website and filling in your information for the purposes set out in section 2.1 using personal information. Wherever possible, we aim to obtain your consent to process this information, for example, by asking you to agree to our use of cookies set out in this policy under section 4.2. Collecting information with cookies.
- Legitimate interests: we may process information on the basis there is a legitimate interest, either to you or to us. Where we process your information on this basis, we do after careful consideration whether the same objective could be achieved through other means and whether you would expect us to process your data, and whether you would consider it reasonable to do so. For example, in order to deliver our services for your benefit, we may share your personal data with a trusted third party organisation for the

# md

# MannionDaniels | Privacy Policy

purpose of our business activities or to conduct a survey to better understand your needs and requirements of us as set out in this section

### Where your data is stored

We store your data on our secure servers in the UK. It may also be stored outside of Europe, where it could be viewed by our staff or suppliers. By submitting your personal data, you agree to this.

#### **Information disclosure**

Through our business activities, we may disclose your personal information to donors, consortium partners and subcontractors for purposes directly related to the management and delivery of our services. This includes the grant making process where we receive applications from interested parties for funding. Those in question will be obligated to use the personal information in accordance with the terms of this privacy statement.

We may also need to disclose your information if required to do so by law and for the purpose of defending our legal rights (including providing information to others for the purposes of fraud prevention).

### **Information protection**

We take reasonable technical and organisational precautions to prevent the loss, misuse or alteration of your personal information. All personal information is stored securely in accordance with the principles of the General Data Protection Regulation.

By using our website services, you acknowledge that the transmission of information over the internet is inherently insecure, and we cannot guarantee the security of data sent over the internet.

You are responsible for keeping the password you use for accessing our website and application portal confidential; we will not ask you for your password (except when you log in to our website).

#### **Cross-border data transfers**

Information that we collect may be stored and processed in and transferred between any of the countries in which we operate to enable the use of the information in accordance with this privacy policy.

In addition, personal information that you submit for publication on the website will be published on the internet and may be available around the world.

You agree to such cross-border transfers of personal information.

# Your individual rights

Under the GDPR your rights in relation to the personal data we hold are expressed as follows. You have;

- The right to be informed about how we use your personal data
- The right of access to the data we hold
- The right to rectification of any data we hold;



- The right to erasure of your data
- The right to restrict processing of your data
- The right to data portability of your data
- The right to object; and
- The right not to be subject to automated decision-making including profiling.

You also have the right to complain to the  $\underline{ICO}$  (opens in a new window) if you feel there is a problem with the way we are handling your data.

If you would like any further information about your rights, please contact using the contact information in section 1.

# **Accessing your personal information**

Individuals can find out if we hold any personal information by making a 'subject access request' under the General Data Protection Regulation (GDPR). If we do hold information about you, we will:

- Give you a description of it;
- Tell you why we are holding it;
- Tell you who it could be disclosed to; and
- Let you have a copy of the information in an intelligible form

You may request a copy of the personal information by emailing us at:

operationsandcompliance@manniondaniels.com

#### **Data retention period**

Personal data that we process shall not be kept for longer than is necessary. Our retention period is in line with our contract conditions with the donors we serve and the default legal standard retention period which is specified as six years.

Personal data acquired as a result of your consent for receiving our newsletters will be kept until the consent is removed. However, we will review and refresh your consent on a regular basis, at least every 24 months.

# Withdrawing your consent

You may exercise your right to withdraw your consent in relation to your personal data being used at any time by written notice to us via email to: operationsandcompliance@manniondaniels.com or by way of letter to:

The Data Protection Officer MannionDaniels Limited Universal House

# md

# MannionDaniels | Privacy Policy

1-2 Queen's Parade Place Bath, BA1 2NN

By withdrawing your consent this does not affect the lawfulness or processing based on consent before its withdrawal.

#### Visitors to our websites

When someone visits our website, we use a third-party service, Google Analytics, to collect standard internet log information and details of visitor behaviour patterns. We do this to find out things such as the number of visitors to the various parts of the site. This information is only processed in a way which does not identify anyone. We do not make, and do not allow Google to make, any attempt to find out the identities of those visiting our website.

Our website uses Google Analytics, a web analytics service provided by Google, Inc. ("Google"). Google Analytics uses "cookies", which are text files placed on your computer, to help the website analyse how users use the site. The information generated by the cookie about your use of the website (including your IP address) will be transmitted to and stored by Google on servers in the United States.

Google will use this information for the purpose of evaluating your use of the website, compiling reports on website activity for website operators and providing other services relating to website activity and internet usage. To opt out of being tracked by Google Analytics across all websites visit <u>Google</u> (opens in a new window).

#### Use of cookies

Our website uses cookies. Cookies are small text files that are placed on your computer by websites that you visit. They are widely used in order to make websites work, or work more efficiently (e.g. by recognising a user's device), as well as to provide information to the owners of the site. We use the following types of cookies:

- 1. Strictly necessary cookies: These cookies are essential for the user to move around the website and to use its features
- Performance cookies: These cookies collect information about how the user makes use of the site, e.g. which pages the user visits most. These cookies do not collect information that identifies the user
- 3. Functionality cookies: These cookies remember choices made by the user and enhance the features, e.g. language or users location. This cookie is also used to remember a user's preferences for a font size, or customisable parts of a web page.

# **Collecting information with cookies**

We may use cookies to collect information about how you use the website, for example we may store information related to:

- The website pages you visit
- How long you are on the website for
- Whether you are a new or returning user
- How you came to the website
- The type of device and browser you use.



# Disabling or deleting cookies

Most web browsers allow some control of most cookies through the browser settings. To find out more about cookies, including how to see what cookies have been set and how to manage and delete them, visit <a href="About Cookies">About Cookies</a> (opens in a new window) or <a href="All About Cookies">All About Cookies</a> (opens in a new window) If you disable cookies by blocking them, or delete cookies, the functionality of the website will likely be affected.