

TEENAGE GIRL CHILD SUPPORT & DEVELOPMENT INITIATIVE

PRIVACY POLICY

1. Introduction and General Terms

Teenage Girl Child Support & Development Initiative (TGCSDI or we), and the people we seek to help, are dependent on the generosity of our members and supporters as well as the goodwill and trust of the public. We are therefore committed to protecting any personal information we obtain about you, whether you are just visiting our website www.teenagegirlchild.org (the site) or are a member, financial supporter or volunteer. This Privacy Policy sets out how we obtain, use and protect any personal information you provide to us or that we may collect about you, whether online, via phone, text, email, in letters or in other correspondence.

Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it. By visiting the site, you are accepting and consenting to the practices described in this Privacy Policy.

This privacy policy explains the following:

- What information TGCSDI may collect about you;
- How TGCSDI will use information we collect about you;
- When TGCSDI may use your details to contact you;
- Whether TGCSDI will disclose your details to anyone else;
- Your choices regarding the personal information you provide to us; and
- The use of cookies on the site and how you can exercise your choices in relation to those cookies.

TGCSDI is committed to safeguarding your personal information. Whenever you provide such information, we are legally obliged to use your information in line with all laws concerning the protection of personal information, including the Data Protection Act 1998 and the Privacy & Electronic Communications (EC Directive) Regulations 2003.

The site contains hyperlinks to websites owned and operated by third parties. These third party websites have their own privacy policies, including policies on their use of cookies. If you follow a hyperlink to a third party website, we urge you to review these policies before submitting any personal data to the third party website. The third party's policies will govern the use of personal information you submit or which is collected by cookies whilst visiting these websites. We do not accept any responsibility or liability for the privacy practices of third party websites and your use of such websites is at your own risk.

2. Who we are

TGCSDI is a Non- Governmental Organization that is passionate about and committed to improving the status of the teenage girl child. We are registered in Nigeria with the Corporate Affairs Commission with registration number RC . TGCSDI's registered addresses are;

- **Head Office:** 12, Jattu Road, PMB 995, Auchi, Edo State, Nigeria
- **Branch Office:** Aisu Road, Opposite NYSC Orientation Camp, Ede, Osun State, Nigeria.

3. What information will TGCSDI collect about me?

When you contact TGCSDI to become a member, make a donation or sign up to any of TGCSDI's activities or online content, such as newsletters or you telephone, email or write to TGCSDI, or engage with TGCSDI via social media channels, we may receive and retain personal information about you. This can consist of information such as your name, email address, postal address, telephone or mobile number, bank account details to process donations and whether or not you are a tax payer so that we can claim Gift Aid.

By submitting your details, you enable TGCSDI (and where applicable any sub-contractors we may use) to raise funds and to provide you with the goods, services, information, activities or online content you select.

We do not usually ask members to provide "sensitive personal data" (such as information relating to racial or ethnic origin, religious beliefs, sexual orientation, health information and political opinions). However, if you reveal such information in emails or other communications hosted by our site, you are consenting to this sensitive personal data being collected and processed by us. If you do not wish to consent, please do not include sensitive personal data in your communications to, or through, the site.

If there is a clear reason for collecting sensitive personal data, for example if you are participating in a marathon or similar fundraising event or where we need this to ensure that we provide appropriate facilities or support to enable you to participate in the event. Clear notices will be provided on applications for such events so that it is clear what information we need and why we need it.

If you are simply browsing the site as an anonymous visitor, TGCSDI may still collect certain information from you, such as your IP addresses (an IP address is a number that can uniquely identify a specific computer or other network device on the internet).

If you enter your contact details in one of our online forms, we may use this information to contact you even if you don't "send" or "submit" the form. We will only do this to see if we can help with any problems you might be experiencing with the form or with our websites.

We may combine the information we collect about you and the information you give to us with information we receive from other sources.

TGCSDI also uses cookies. Cookies are small text files on your device. They are made by your web browser when you visit a website. Every time you go back to that website, your browser will send the cookie file back to the website's server. They improve your experience of using a website, for example, by remembering your preference settings and by measuring your use of a website to ensure that it meets your needs. See Section [11] below for more detail on how we use cookies and how you can control your cookie preferences.

4. How will TGCSDI use the information it collects about me?

TGCSDI will use your personal information for a number of purposes including the following:

- in relation to any correspondence you have entered into with us whether by letter, email, text, social media, message board or any other means;
- for "service administration purposes", which means that TGCSDI may contact you for reasons related to donations you have made such as your tax status with regard to Gift Aid, the completion of commercial or other transactions you have entered into with TGCSDI or the activity or online content you have signed up for;
- for internal record keeping, to administer the site and for internal operations, including troubleshooting, data analysis, testing, statistical and survey purposes;
- to fulfill sales contracts you have entered into with TGCSDI;
- to contact you about any content you provide;
- to invite you to participate in surveys or research about TGCSDI or our work (participation is always voluntary);
- for marketing purposes where you have specifically consented to receive marketing communications from us (see below);
- to provide you with information about our activities or online content you have agreed to receive;
- to personalize the way TGCSDI content is presented to you;
- to use IP addresses to identify the location of users, to block disruptive use, to establish the number of visits from different countries;
- to analyze and improve the activities and content offered by the site and to provide you with the most user-friendly navigation experience. We may also use and disclose information in aggregate (so that no individuals are identified) for marketing and strategic development purposes;
- to notify you about changes to our service; and
- as part of our efforts to keep our site safe and secure.

5. Will I be contacted for marketing purposes?

TGCSDI will only contact you for marketing purposes where you have provided us with freely given consent to do so. You may provide that consent in various ways including through online or paper forms, responding to television adverts (where consent statements are clearly visible) or face-to-face through engagement with our staff.

Please see section [10] below for information on how to change your communication preferences, including opting out of future marketing communications.

6. Personal information submitted when you make a donation or purchase a ticket

We will collect your first and last name, and your email address, when you make a donation or purchase a ticket using our site. When you make a card payment, your credit or debit card details are only collected by our third party payment provider – Paystack. We do not store your credit or debit card details.

If you choose to claim Gift Aid on your donation, we will also collect your declaration of tax status and your home address.

7. Will TGCSDI share my personal information with anyone else?

We will only use your information for the purposes for which it was obtained. We may share your information with any member of our group, which means our subsidiaries, our ultimate holding company and its subsidiaries.

TGCSDI will not, under any circumstances, share or sell your personal data with any third party for marketing purposes and you will not receive offers from other companies or organizations as a result of giving your details to us.

We may share your information with selected third parties, including “data processors” such as our service providers, associated organizations and agents who help us to prepare and send the materials relating to our projects and fundraising activities. These “data processors” will only act under our instruction and we will not allow these organizations to use your data for their own purposes and will take care to ensure that they keep your data secure.

We may disclose your information to third parties:

- in the event that we buy or sell any business or assets, in which case we may disclose your personal data to the prospective buyer or seller;
- if TGCSDI or substantially all of its assets are acquired by a third party, in which case personal data held about members will be one of the transferred assets;

- if disclosure is required or permitted by law (for example to government bodies for tax purposes or law enforcement agencies for the prevention and detection of crime, subject to such bodies providing us with a relevant request in writing); and
- in order to enforce or apply our terms and conditions or to protect the rights, property or safety of The Circle, or our members or others. See Section [7] for more detail.

8. Offensive or inappropriate content placed on the site

If you post or send offensive, inappropriate or objectionable content to or anywhere on the site or otherwise engage in any disruptive behaviour on any TGCS DI service, we may use your personal information to stop such behaviour.

Where TGCS DI reasonably believes that you are or may be in breach of any applicable laws (e.g. because content you have posted may be defamatory), we may use your personal information to inform relevant third parties such as your employer, internet provider or law enforcement agencies about the content and your behaviour.

9. Where we store your personal data

It may sometimes be necessary to transfer personal information overseas. When this is needed, information is only shared within the European Economic Area (EEA). Data may also be processed by staff operating within the EEA, who works for us or for one of our suppliers. Such staff may be engaged in, among other things, the provision of goods, services, information, activities or online content that you select or the processing of your payment details. By submitting your personal data, you agree to this transfer, storing or processing. TGCS DI will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this Privacy Policy.

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 the 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 unauthorized access.

10. How long will TGCS DI keep my personal information?

We will hold your personal information on our systems for as long as it is necessary for the relevant activity, for example we will keep a record of donations for at least seven years.

If you request that we stop sending you marketing materials, we will keep a record of your contact details and appropriate information to enable us to comply with your request not to be contacted by us.

Where you contribute material to us, e.g. user generated content or in response to a particular campaign we will generally only keep your content for as long as is reasonably required for the purpose(s) for which it was submitted unless otherwise stated at the point of generation.

11. What is TGCSDI's policy on allowing me to update, correct, or delete my personal information?

The accuracy of your information is really important to us. We want to ensure that we are able to communicate with you in ways that you are happy with, and to provide you with information that is of interest. If you wish to change how we communicate with you, or update the information we hold, then please contact us. You may:

- email us at teenagegirlchild2018@gmail.com; or
- write to us at: TGCSDI:

Head Office: 12, Jattu Road, PMB 995, Auchi, Edo State, Nigeria

Branch Office: Aisu Road, Opposite NYSC Orientation Camp, Ede, Osun State, Nigeria.

You may also opt out of marketing emails at any time by clicking the unsubscribe link in any marketing email from TGCSDI.

Under the Data Protection Act, you have the right to request a copy of the personal information we hold about you and to have any inaccuracies corrected. (We charge N1,000 for information requests and require you to prove your identity with two pieces of approved identification).

Please address requests and questions about this or any other question about this Privacy Policy to the Executive Director, TGCSDI:

- **Head Office:** 12, Jattu Road, PMB 995, Auchi, Edo State, Nigeria
- **Branch Office:** Aisu Road, Opposite NYSC Orientation Camp, Ede, Osun State, Nigeria.

12. Cookies Policy – information TGCSDI collects from your computer or mobile device **a. What is a cookie?**

Cookies are small text files on your device. They are made by your web-browser when you visit a website. Every time you go back to that website, your browser will send the cookie file back to the website's server. Cookies are useful because they allow a website to recognize a user's device.

Cookies do lots of different jobs, like letting you navigate between pages efficiently, remembering your preferences, and generally improving the user experience.

They can also help to ensure that adverts you see online are more relevant to you and your interests.

b. Why does TGCSDI use cookies?

Like many websites, TGCSDI uses cookies in order to provide you with a more personalized web service.

Cookies help us identify which bits of the site people are using, and help us to work on those sections of the site to improve the user experience. We also use cookies to help show content on the site which is relevant to you and your interests, for example if on a previous visit you went to our pages about donations, about us or events, we might find this out from your cookie and show you other information on the site related to emergencies, festivals or events on subsequent visits.

Information supplied in cookies also allows us to measure the effectiveness of online marketing campaigns for TGCSDI. This enables us to ensure any money we spend on digital marketing gives us a good return on investment.

If you register with us or if you continue to use the site, you agree to our use of cookies.

13. Changes to TGCSDI's Privacy Policy

TGCSDI may update this Privacy Policy at any time by amending this page so please check this page from time to time and take notice of any changes. In particular, you may wish to check this page each time you submit personal information to TGCSDI. If you do not agree to these changes, then please do not continue to use the site.

14. Contact

If you have any comments or queries concerning our Privacy Policy, please email us at teenagegirlchild2018@gmail.com or write to us at:

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