Privacy Policy

INTRODUCTION

Oxfam Aotearoa (**OAO, Oxfam, we, us, our**) promises to take great care with your personal data. We commit to protecting any personal information we obtain about you, whether you are a financial supporter, shopper, volunteer, partner, staff member, event participant, fundraiser or campaigner.

This Privacy Policy sets out how and why we obtain, use and protect personal information if you interact with us in one of these roles. We strive to ensure we comply with best practice and professional standards in the charitable sector and as a fundraising organisation.

In the event that you work with us in another way - for instance, enrol in a specific event, program, apply for a job, or are a member of staff, there may be a separate Privacy Policy or Terms and Conditions which describes how we use that data.

WHO WE ARE

Oxfam Aotearoa is a registered charity (charity number CC24641) and a charitable trust (charitable trust number 502175). Our registered address is Level 1, 14 West Street, Eden Terrace, Auckland 1010.

Oxfam Aotearoa is an affiliate member of Oxfam International. Oxfam International brings together over twenty Oxfam organisations from around the world who seek to work collaboratively with a common mission to transform the systems that drive injustice: climate breakdown, women's inequality, and unfair economies.

Although locally we are sometimes just referred to as Oxfam, overseas we are known as Oxfam Aotearoa to distinguish ourselves from our sister organisations from other countries. This Privacy Policy relates only to information which is obtained by Oxfam Aotearoa.

OXFAM'S PURPOSE

Oxfam's purpose and overall mission is to challenge poverty and injustice. We provide humanitarian aid in times of crisis, fund long term community development programmes and conduct research and campaign for long term solutions to poverty.

Our supporters help us to achieve this in a variety of ways, primarily by:

1. Fundraising, donating money and purchasing goods for sale on our online Oxfam shop in order to support our programme of work
2. Campaigning for change, through signing petitions, writing letters and taking part in other campaigning actions
3. Volunteering, including in our offices and at events

We take active steps to make sure that our supporters are aware of the ways in which they can help us achieve our overall purpose.

WHY WE HOLD AND PROCESS SUPPORTERS' PERSONAL DATA

We hold and process supporters' personal data for a number of reasons:

- To keep a record of donations made and actions taken by our supporters and our communications with them
- To send our supporters information about our projects, campaigns, fundraising activities and appeals where we have their consent or are otherwise allowed to for operational reasons
- To support volunteers, whether in our offices or participating in fundraising events

- To support community-based fundraising and campaigning
- To provide supporting documentation to allow supporters to claim tax credits on donations
- To fulfil contractual obligations entered into with supporters e.g. online purchases
- To keep people safe, whether they are staff, volunteers or participants in events
- To comply with legal obligations
- To manage our organisation
- To help understand the preferences and demographics of our supporters to better meet their interests
- To ensure we do not send unwanted information to supporters or members of the public who have informed us they do not wish to be contacted

WHEN AND WHY WE WILL SEND YOU PERSONALISED MARKETING COMMUNICATIONS

Oxfam will only contact you for marketing purposes, where we have your consent or we are otherwise allowed to do so, where consent is inferred from your previous repeat conduct, business, or other relationships with us, as allowed for under the Unsolicited Electronic Messages Act 2007 and subsequent amendments.

We will make it easy for you to tell us if you would like to receive marketing communications from us and hear more about our work. We may ask you to reconfirm your consent if we have evidence that suggests you may no longer wish to hear from us. We will not send you marketing material if you have told us that you do not wish to receive it. There are a variety of ways you can do this, see *HOW TO CONTROL WHAT WE SEND YOU*.

WHEN WE COLLECT INFORMATION ABOUT YOU

Oxfam may collect your personal data in the following circumstances:

1. When you give it to us DIRECTLY

You may give us your personal data directly when you make a donation, sign up for one of our events, take part in a campaigning action, volunteer for us, purchase products from the Oxfam Online Shop, or when you communicate with us.

2. When you give it to us INDIRECTLY

You may give us your information indirectly when you sign up to third-party events such as the Auckland Marathon, contribute to Oxfam via fundraising sites like Givealittle, donate to us through payroll giving participate in a campaigning action with a partner, or express interest in the type of work we do through one of our advertising partners. These independent third parties will pass your data to Oxfam only where you have indicated that you wish to support Oxfam and have given your consent to that third party or it is a necessary part of their completing a contract with you.

Sometimes your personal data is collected by an organisation working on our behalf (for example a professional fundraising agency) but as they are acting on our behalf we are the "data controller" and responsible for the security and proper processing of that data.

3. When you access Oxfam's Social Media

We might also obtain your personal data through your use of social media such as Facebook, Instagram, Twitter or LinkedIn, depending on your settings or the privacy policies of these social media and messaging services. To change your settings on these services, please refer to their privacy notices, which will tell you how to do this.

https://www.facebook.com/privacy

https://twitter.com/en/privacy
https://www.instagram.com/legal/privacy/
https://www.linkedin.com/legal/privacy-policy

4. When the information is publicly available

We might also obtain personal data about individuals who have expressed an interest in giving major gifts to charities or organisations like Oxfam. In this scenario, Oxfam may seek to find out more about these individuals, their interests and motivations for giving, but only through publicly available information. This information may include newspaper or other media coverage, open postings on social media sites such as LinkedIn, and data from the Companies Register.

We may also gather information if your activities relate to our work - for instance, if you are a public figure such as a Member of Parliament or you represent an organisation which we work with or which is related to one of our campaigns we may gather information about you in order to inform our campaigning and make decisions - for instance, whether we engage with you to seek your support for our work, ask your constituents to write to you, or choose to work you in another way.

5. When we use cookies and tracking technologies

Cookies are a useful way for us to understand how supporters use our website and/or use an Oxfam app. When you visit our web site or use an Oxfam app, data is collected from your computer or other device such as a smart phone or tablet through the use of "cookies". Cookies are created by your web browser when you visit our website. Every time you go back to the Oxfam website, your browser will send the cookie file back to the website's server. They improve your experience of using our website, for example, by remembering your preference settings so that you are presented with information likely to be most relevant to you, and by measuring your use of the website to enable us to continuously improve our website to ensure that it meets your needs. Cookies can also be used to show you relevant Oxfam content on social media services such as Facebook - these are known as "retargeting"' or "advertising" cookies.

If you visit our website as an anonymous visitor (e.g. you switch off cookies), Oxfam may still collect certain information from your browser, such as the IP address (an IP address is a number that can uniquely identify a computer or other internet device), to help ensure we are communicating with legitimate supporters in a safe and secure manner.

The Oxfam website contains hyperlinks to websites owned and operated by other organisations including Oxfam affiliates in other countries. These third-party websites have their own privacy policies, including policies on their use of cookies, and we urge you to review them. They will govern the use of personal information you submit or which is collected by cookies whilst visiting these websites. We cannot accept any responsibility or liability for the privacy practices of such third-party websites and your use of such websites is at your own risk.

WHAT INFORMATION MIGHT OXFAM COLLECT ABOUT YOU?

We only collect personal data relevant to the type of transactions or interaction you may wish to have with Oxfam. For example, **when you contact Oxfam** to make a donation, purchase an item online, take a campaign action, or sign up to any of Oxfam's activities or online content (such as newsletters, competitions, or message boards) or you telephone, email, write to or text Oxfam, or engage with Oxfam via social media channels, we may receive and retain personal information associated with that interaction.

In these cases we are likely to process details such as your name, email address, postal address, telephone or mobile number, credit card and bank account details to process donations.

If you **visit one of our offices or participate in one of our events** you may give information to our staff via a visitors sign-in book, through a registration or ticketing process or through a feedback process.

If you **participate in or attend an event** we may (with your permission) take your photograph or video, or interview you.

If you **participate in market research**, we may ask you questions regarding your experience with us, or other survey questions relating to your experience.

If you are a **campaigner or work with our campaigns team**, we may collect information such as correspondence with you regarding campaigning, details of your background and activities with us or relating to the issue, the events you attend, or how we would like to work with you.

Where we gather information about you which is **publicly available** - for instance as **a major donor** or your views on our **campaigning activity** - this may include your name, contact details, views and positions you have expressed, and details regarding your circumstances where these are publicly available - for instance which political roles you hold or what your background is.

HOW WILL OXFAM USE YOUR PERSONAL DATA?

Oxfam will use your personal information for the following purposes:

1. ***For administrative reasons***, including:

    - "service administration", which means that Oxfam may contact you for reasons related to administering any donations you have made, the completion of commercial or other transactions you have entered into with Oxfam or the activity or online content you have signed up for;
    - to confirm receipt of donations, and to say thank you and provide details of how your donation might be used;
    - in relation to correspondence you have entered into with us whether by letter, email, text, social media, message board or any other means, and to contact you about any content you provide;
    - for internal record keeping so as to keep a record of your relationship with us;
    - to fulfil sales contracts you have entered into with Oxfam;
    - to provide logistical and fundraising information to people who are taking part in a fundraising event in aid of Oxfam, such as the Oxfam Trailwalker event;
    - to communicate with Oxfam volunteers - to support you in your designated role or administer that role and our organisation;
    - to keep your data up to date - for instance we may use NZ Post's data on postal address changes to ensure that we can maintain contact with you where we believe you are happy to be contacted by post, we may also use services which notify us of the recently deceased to avoid any distress that continued communications would cause;
    - to implement any instructions you give us with regard to withdrawing consent to send marketing information;
    - to use IP addresses to identify the location of users, to block disruptive use and to establish the number of visits from different countries;

- to protect our staff and those with whom we work, or to prevent crime and dishonesty. This will involve frequent fraud and anti-terrorism screening of employees and partner organisations using the World-Check database (Refinitiv - Thomson Reuters), and the use of eDiscovery features on our Microsoft tools to support investigations.

2. ***For marketing and fundraising reasons*** (see *WHEN AND WHY WE WILL SEND YOU PERSONALISED MARKETING COMMUNICATIONS*).

3. ***For market research:***

- to invite you to participate in surveys or research about Oxfam or our work (participation is always voluntary);
- to analyse and improve the activities and content offered by the Oxfam website 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.

WILL OXFAM SHARE YOUR PERSONAL INFORMATION WITH ANYONE ELSE?

We will only use your information within Oxfam for the purposes for which it was obtained. Oxfam will not, under any circumstances, share or sell your personal data with any third party for their own marketing purposes, unless you have expressly asked us to do so, and you will not receive marketing from any other companies, charities or other organisations as a result of giving your details to us.

Oxfam's suppliers

We may need to share your information with service providers who help us to deliver our projects, fundraising activities and appeals. These service providers will only act under our instruction and are subject to pre-contract scrutiny and contractual obligations containing strict data protection clauses. They will only have access to the limited data necessary for them to carry out their role. We do not allow these organisations to use your data for their own purposes or disclose it to other third parties without our consent and we will take all reasonable care to ensure that they keep your data secure.

Social media sites

As with many businesses and charities, we may also use your email address and phone number to match to your social media accounts in order to show you Oxfam content while using these services. We only do this where you have opted in to marketing emails or phone calls and we keep your data secure by encrypting it. No data we hold about you is retained by the third party.

In addition, we may also use your email address and phone number to link to social media sites in order to identify other users of these sites whom we believe would be interested in Oxfam, and we may then show them Oxfam content. No data we hold about you is retained by the third party.

There are two ways to prevent this use of your data, you can **contact us** directly and request to opt out of the relevant channel of communication or you can do this via the social media site in question:

Facebook: **https://www.facebook.com/help/568137493302217**
Instagram: **https://www.facebook.com/help/instagram/2885653514995517**

LinkedIn: **https://www.linkedin.com/help/linkedin/answer/62931**
Twitter: **https://business.twitter.com/en/help/troubleshooting/how-twitter-ads-work.html**

Updating your preferences with Oxfam will not guarantee that you never see Oxfam content on social media, since the social media site may select you based on other criteria and without your data having been provided by Oxfam.

Current and former Oxfam employees

We have a separate **Employee Privacy Notice** that covers the personal information we collect from our employees and how we use this information when you are employed by us.

When you leave Oxfam, Oxfam may process your data to respond to requests for employment references. In addition, OAO participates in the Inter-Agency Scheme for the Disclosure of Safeguarding-related Misconduct in Recruitment Process within the Humanitarian and Development Sector ('Scheme'). Where you apply for employment with another member of the Scheme, they will request a statement from Oxfam disclosing whether you have been found to have committed misconduct (in the form of sexual exploitation, sexual abuse or sexual harassment) while employed at Oxfam. Oxfam will respond to these requests in line with the rules of the Scheme.

More details about the Scheme are available on the **Steering Committee for Humanitarian Response website**.

Where legally required

We will also comply with legal requests where disclosure is required or permitted by law (for example to government bodies, statutory bodies, or law enforcement agencies for tax purposes, where it is in the public interest, or the prevention and detection of crime, subject to appropriate protection in law).

HOW LONG WILL OXFAM KEEP YOUR PERSONAL INFORMATION?

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

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.

Legacy income is vital to the running of the charity. We may keep data you provide to us after you have died, to carry out legacy administration and communicate effectively with the families of people leaving us legacies. This also enables us to identify, honour and analyse the source of legacy income we receive.

Where you contribute material to us, e.g. user generated content or in response to a particular campaign, we will 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.

HOW TO CONTROL WHAT WE SEND YOU

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 at the details provided in the *HOW TO CONTACT US* section of this document.

Additionally, you can opt out of email and SMS separately:

- Email - You can opt out of marketing emails at any time by clicking the unsubscribe link in any marketing email from Oxfam.
- SMS - You can also opt out of SMS messages by responding to the unsubscribe instructions in the text.

How long will it take for these changes to be effective?

We endeavour to meet the following service levels where supporters request we do not send them marketing information:

- Email – 5 working days from receipt of email
- SMS - 24 hours from receipt of SMS
- Telephone - 5 working days from receipt of request to opt out
- Mail - 28 days from receipt of 'do not mail' request. This period is longer than for other channels due to the production times for mailing campaigns, and in most cases we would expect the change to be effective much more quickly.

HOW OXFAM KEEPS YOUR DATA SAFE

We ensure that there are appropriate and secure technical controls in place to protect your personal details. For example, our online forms are always encrypted and our IT network is protected and routinely monitored.

We undertake regular reviews of who has access to information that we hold to ensure that your information is only accessible by appropriately trained staff, volunteers and contractors.

All staff have to sign a code of conduct which includes a commitment to complying with legal requirements such as the Privacy Act.

We use external companies to collect or process personal data on our behalf. We do comprehensive checks on these companies before we work with them, and put a contract in place that sets out our expectations and requirements, especially regarding how they manage the personal data they collect on our behalf, or have access to.

These external organisations also have legal liability for the way in which your data is used, providing you with additional protection.

YOUR RIGHTS OVER YOUR PERSONAL DATA

The accuracy of your information is really important to us. You have a variety of rights in respect of your data, including the rights to see, request changes, object to the use of or withdraw use of your data.

You can contact us to request to exercise these rights at any time, see *HOW TO CONTACT US* for details of how to get in touch.

Opting out of Direct marketing

You have the right to stop the use of your personal data for direct marketing activity through channels that you select. We will always comply with your request.

Access and corrections of your personal information

You have the right to request a copy of the personal information we hold about you, and to ask for changes if it is incorrect or out of date. We will provide this information as soon as possible (unless an exception in the Privacy Act applies), and within a month unless there are specific reasons why this would not be possible. We will always let you know if this is likely to be the case.

Checking your identity

To protect the confidentiality of your information, we will ask you to verify your identity before proceeding with any request you make under this Privacy Notice.

If you have authorised a third party to submit a request on your behalf, we will ask them to prove they have your permission to act.

HOW TO CONTACT US

If you would like more information, to update your details or have any questions about this policy, please contact our supporter relations team.

- email us at **oxfam@oxfam.org.nz**
- write to us at: PO Box 68357, Victoria St West, Auckland 1142
- call us on 0800 600 700 / +64 9 355 6500 (Mon-Fri 9am-5pm)

To make a formal complaint about Oxfam's approach to data protection, or raise privacy concerns with our Operations Director, you can do so at the above contact details.

If you are unhappy with our response to any requests you have made to us regarding the use of your personal data, or you feel that your data has not been handled correctly, you also have the right to lodge a complaint with the Privacy Commissioner. You can contact them by calling **0800 803 909**, or go online to **https://www.privacy.org.nz/your-rights/making-a-complaint/**.

CHANGES TO OXFAM'S PRIVACY POLICY

This Privacy Policy may be updated from time to time so you may wish to check it each time you submit personal information to Oxfam.

Document department, owner(s)	Operations, Operations
Last reviewed, by, month, year	Geo Bidois, People and Culture Manager, March 2024
Next review date	March 2027
Board approval	ED to Board
Document location	Organisation policies > Risk and Compliance