



DATA PRIVACY POLICY

2022

Policy and Procedure Owner:		Mirror of Hope CBO
Approved by: Thomas Francis Kearney <i>T. Kearney</i>		Mirror of Hope Advisory board
First Approved	Date Revised	Next Review
Jan, 2017	March, 2023	March, 2026

Online Data Privacy Policy - Staff Review

This Mirror of Hope privacy policy ('Privacy Policy') sets out how Mirror of Hope C.B.O ('we', 'us' or 'our' being interpreted accordingly) uses and protects the personal information about you that we collect or that you provide, whether through our website at www.mirrorofhopecbo.org ('Website') or by other means.

Privacy Policy

Effective as of April 10, 2020

Changes to our privacy policy

We may modify this Privacy Policy at any time so please check often for the latest version. We will aim to send changes to the practices outlined in this Privacy Policy at least 30 days prior to them being implemented.

Personal information we collect.

We collect personal information from you in various ways, for example:

- When you supply personal details while donating through our payment gateways or registering to support us.
- when you donate through our appointed partners or third-party platforms, in which case our partners and third-party platforms will provide us with this information.
- if you order any merchandise; and/or
- if you raise an inquiry or issue with us.

Our Commitment to Our Donors

We will not sell, share or trade our donors' names or personal information with any other entity, nor send mailings to our donors on behalf of other organizations. This policy applies to all information received by Mirror of Hope C.B.O, both online and offline, on any Platform ("Platform", includes the Mirror of Hope website), as well as any electronic, written, or oral communications.

Introduction

Your privacy is a priority for Mirror of Hope C.B.O (<https://mirrorofhopecbo.org/>) (sometimes referred to as "MOH", "us", or "we") and we want you to be familiar with how we collect, use, and disclose information relating to you, your computer, or your device and that enable your identification (the "Personal Information"). This Privacy Statement describes our practices with information that we (or our service providers) collect from a user (sometimes referred to as

“you” or “your”) through our websites, applications, and our other network-connected products and services that link to this Privacy Statement (collectively, the “Site”). This Privacy Statement only addresses information collected directly through or from our Site – it does not address or govern any information-gathering, use, or dissemination practices related to information collected from you other than directly through or from the Site, such as from telephone, facsimile, postal mail, personal delivery, or other or additional offline means or media.

MOH can be contacted by email regarding this privacy policy and technical support at ict@mirrorofhopecbo.org.

International transfers

Personal Data that we collect will be processed by staff, volunteers and contractors who are based at our offices in Nairobi, Kenya. However, given the international nature of our organization, by providing us with Personal Data, you agree that we may share Personal Data with our partners in other parts of the world in accordance with this Privacy Policy.

Customer Relationship Management

We may also contract with a third-party Customer Relationship Management platform provider to manage our customer relationship management ('CRM') database.

1. Collection of Personal Information from Users

When you interact with us through the Site, we may collect information from you as described below.

a. Information You Provide

Some elements of the Site may ask you to submit Personal Information in order for you to benefit from the specified features or participate in a certain activity, such as newsletter subscriptions or donation processing. For example, if you register for an account on the Site, we may request Personal Information such as your name and contact information. If you make a donation on the Site, we will collect your credit or debit card or other financial account information. When you perform a search within the Site, MIRROR OF HOPE C.B.O may record information identifying you or linking you to the search performed and recording information related to the search request. We may combine the information you submit through the Site with other information we have collected from you, whether on-line or off-line. We treat the combined information in accordance with this Privacy Statement.

b. Sensitive Information

Unless we specifically request or invite it, we ask that you not send or otherwise disclose to us your racial or ethnic origin, political opinions, religion or other beliefs, health, criminal background, or trade union membership. In those cases where we may request or invite you to provide the foregoing information, we will only do so with your express consent, in accordance with applicable data protection law requirements. Where you provide us with such information without request from **MIRROR OF HOPE C.B.O.**, we reserve the right (but do not have any obligation) to erase any such information at our discretion.

c. Information About Minors

The website is not intended for persons under the age of 16. We do not knowingly collect Personal Information online from persons in this age group. We reserve the right to delete any information identified as having been provided by such persons at our discretion.

d. Location Information

Any comment system on the Site may utilize an opt-in Geolocation service in accordance with a prevailing community standard such as HTML 5. Such Geolocation opt-in ability is managed by the user's browser settings. If a user chooses to opt-in to the Geolocation service, the user's comments may be associated with the user's location, both internally within MIRROR OF HOPE C.B.O and publicly on the Sites.

e. Passive Information Collection, Use, and Choices

As you navigate the Site, certain Personal Information may be passively collected, meaning it is gathered without your actively providing it. This is done using the following techniques in the following ways: through your browser, IP Addresses, Social Media Widgets.

Cookies: You can refuse our use of some or all cookies by turning off the use of cookies in your web browser. If you use your browser settings to block all types of cookies you may not be able to access all or parts of our Site or functionality may be limited. You can set your browser to notify you before you receive a cookie, giving you the chance to decide whether to accept it. You can also set your browser to turn off cookies.

The cookie-related information will not be used for personal identification of individuals and data relating to usage patterns on our Website is kept under our control. These cookies will be used for the following purposes:

- to improve Website usability.
- so, we can remember your device or computer between successive actions or sessions; and

- to perform anonymous statistical analysis to improve the functionality of our Website or any services we offer through the Website.

Changing your internet browser settings can prevent the use of cookies. Each browser has a different procedure for disabling the use of cookies. The Help function within your browser should tell you how. Alternatively, you may visit <http://www.aboutcookies.org> where you can review information on how to control cookies on a variety of browsers. You will also find details of how to delete cookies from your computer and other general information about cookies. You can visit <https://tools.google.com/dlpage/gaoptout> for information on how to opt out of Google Analytics cookies.

Google Analytics: We use Google Analytics, which is provided by Google Inc. It uses cookies to collect, for example, information about the operating system and the browser that you use, your IP address, the website you previously accessed (referrer URL) and the date and time of your visit to the Websites. On subsequent repeated visits to the Websites, frequently used information is automatically displayed for you. We are able to track your usage patterns with the help of the cookies. The information generated by cookies about the use of the Websites is transmitted to a Google server, which may be located within or outside of, the Kenya, and stored there. Google will use this information to evaluate your use of the Websites. Google may transfer these rights to third parties insofar as it is required to do so by law or in order that data may be processed on Google's behalf. By accepting this policy, you consent to the processing of your data by Google. You can visit <https://www.google.com/analytics/learn/privacy.html> to learn more about Google Analytics' use of cookies

Our site currently does not respond to "Do Not Track" (DNT) signals and operates as described in this Privacy Statement whether or not a DNT signal is received, as there is no consistent industry standard for compliance.

2. How We Use the Information We Collect

We use Personal Information submitted by you or otherwise collected through the Site and through other sources for the purposes described in this Privacy Statement and as otherwise described to you at the point of collection. Generally, we use the information you provide to us for the reason for which it was provided. For example, if you sign up to receive email notifications, we will contact you by email. If you provide us with information to make a donation, we will use the information to process your donation. Specifically, we may use Personal Information from or about you:

- i. to respond to your inquiries and to send you information that you request and to process your donations.
- ii. to send you important information regarding our relationship with you or regarding the Site, changes to our terms, conditions, and policies, and other administrative information;

- iii. to notify you about upcoming events and donations.
- iv. to promote our products and services, and the products and services of our affiliates.
- v. for our business purposes, such as data analysis, audits, recordkeeping, developing new products or services, enhancing the Site, improving our services, identifying Site usage trends, optimizing your experience on the Site, and determining the effectiveness of our fundraising campaigns.
- vi. if you choose to complete a survey, we may use the information for purposes of evaluating your feedback from the survey; and
- vii. if we intend to collect and use Personal Information for another purpose, we may seek your permission at the time the information is collected.

We may use any information that does not personally identify you, your computer, or your device, for any purpose.

3. Our Disclosure of Your Information.

MIRROR OF HOPE C.B.O does not sell your Personal Information. We may share your Personal Information with third parties only as described in this Privacy Statement or as otherwise described at the point where we collect the information from you, including:

- i. to our affiliates and other Mirror of Hope C.B.O organizations for the purposes described in this Privacy Statement.
- ii. to the companies or individuals that we hire to provide services to us, such as website hosting services and payment processing; and
- iii. to a third party in the event of any partnerships that we may need to assist us to respond to your inquiry.

We will take reasonable steps to ensure that Personal Data is only used by those third parties for specific, lawful purposes in accordance with this Privacy Policy.

4. Uses and Disclosures to Comply with Laws.

In addition, we use and disclose Personal Information collected through the Site as we believe to be necessary or appropriate: (i) under applicable law, including laws outside your country of residence; (ii) to comply with legal process; (iii) to respond to requests from public and government authorities, including public and government authorities outside your country of residence; (iv) to enforce our terms and conditions; (v) to protect our operations or those of any of our affiliates; (vi) to protect our rights, privacy, safety, or property, and/or that of our affiliates, you, or others; and (vii) to allow us to pursue available remedies or limit the damages that we may sustain.

5. Links to Third Party Sites.

The Site may contain links to other Web sites for the convenience of users in locating information, products, or services that may be of interest. If you access a third-party website from a link on this Site, any information you disclose on that website is not subject to this Privacy Statement. It is possible that these links may be used by third parties or others to collect personal or other information about you. **MIRROR OF HOPE C.B.O** is not responsible for the privacy practices of such websites, advertisers, or third parties or the content of such websites and it is your sole obligation to review and understand the privacy practices and policies of these other websites. **MIRROR OF HOPE C.B.O** does not control these third parties' use of cookies, collection of information, or how they manage such information. It is solely your obligation to review and understand the privacy practices and policies of these other websites, advertisers and any third parties.

6. Where Your Information is Processed.

MIRROR OF HOPE C.B.O is based in the Nairobi, Kenya. No matter where you are located, your Personal Information will be collected and processed in the Nairobi, Kenya. The laws of Kenya and other countries governing data protection may not be as comprehensive or as protective as the laws in the country where you live.

7. Security

MIRROR OF HOPE C.B.O will take appropriate technical and organizational security measures to protect Personal Data from being accessed by unauthorized persons and against unlawful processing, accidental loss, destruction and damage. We also endeavor to take all reasonable steps to protect Personal Data from external threats. However, please be aware that there are always inherent risks in sending information by public networks or using public computers and we cannot 100% guarantee the security of all data disclosed or transmitted to us.

8. Data Retention

We generally retain Personal Information for so long as it may be relevant for the purposes identified in this Privacy Statement, unless a longer period of time is required by law.

9. Lawful Basis for Processing Your Personal Information.

The laws in some countries require us to tell you about the lawful grounds we rely on to collect, use, disclose, and otherwise process your Personal Information. To the extent those laws apply, our lawful bases for processing your Personal Information is in support of our legitimate interests, where those interests are not overridden by your fundamental rights and freedoms: In many cases, we handle Personal Information because it furthers our legitimate business and charitable interests. This includes:

- i. Providing a safe user experience on our Site;

- ii. Customer service.
- iii. Sending communications to you to let you know about what we are doing with your donations and to solicit additional donations.
- iv. Protecting users, our workers, and our property.
- v. Analyzing and improving our operations (e.g., optimizing the design and operation of our Site); and
- vi. Managing legal issues.

This Privacy Statement is issued on behalf of Mirror of Hope C.B.O as controller of your Personal Information under applicable data protection laws. A “controller” is the person or organization who alone or jointly determines the purposes for which, and the manner in which, any Personal Information is, or is likely to be, processed.

10. Your Data Rights and Choices.

You can opt-out of the use of certain cookie-related processing by following the instructions in Section 1(e)above (Passive Information Collection, Use, and Choices).

If you are within the European Union, you have the following rights:

- You have the right to request from MIRROR OF HOPE C.B.O access to your personal data, and the rectification of inaccurate personal data concerning you.
- You have the right to obtain from MIRROR OF HOPE C.B.O the erasure or the restriction of processing of your personal data in certain circumstances, including when the data are no longer necessary in relation to the purposes for which they were collected or otherwise processed, except when MIRROR OF HOPE C.B.O is required by law to maintain or otherwise process your personal data, for the establishment, exercise, or defense of legal claims, or for the protection of the rights of another person.

You may exercise these rights by contacting MIRROR OF HOPE C.B.O using the contact information provided above.

If you are within the European Union, you also have the right to lodge a complaint with a supervisory authority, in particular in the EU Member State of your habitual residence, place of work, or place of an alleged infringement of the applicable data protection law. However, we encourage you to contact us first at ict@mirrorofhopecbo.org and we will try to resolve your concerns.

If you would like to submit a data access, correction, restriction, or deletion request, you can do so by contacting us at ict@mirrorofhopecbo.org and we will process such request with respect to any Personal Information that we are able to link to you individually based on the information

that you can provide to us. These rights and options that you have with respect to Personal Information are subject to limitations and exceptions under applicable law.

11. Right to Change Privacy Statement.

MIRROR OF HOPE C.B.O reserves the right at any time to modify, alter, or update this Privacy Statement. Your use of the Site following any changes means that you agree to follow and be bound by the Privacy Statement as changed, subject to limitations under applicable law. Any change to this Privacy Statement shall be effective as to any user who has visited the Site before the change was made. Please review this policy periodically, and especially before you provide any Personal Information to us. The Privacy Statement was last updated on the date indicated above.

12. Contacting Us.

For questions about this website, please contact us at ict@mirrorofhopecbo.org

For questions about privacy or handling of your personal information, please contact us at ict@mirrorofhopecbo.org

To contact us by mail:

Mirror of Hope C.B.O

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