



Privacy and Ethical Policy 2023- 2025

The Mango Tree Privacy Policy covers how we will gather, store, use and protect data and outlines our commitment to ethical fundraising practices. In compliance with all current UK & RoI legislation, including the Data Protection Act 1998 and the General Data Protection Regulations which came into force on 25th May 2018, The Mango Tree UK (TMT UK) agrees to:

- Operate and encourage best practice in all our fundraising as part of our registration with the UK Fundraising Regulator and adhering to their 'Fundraising Code of Practice.'
- Adhere to the current Charity Commission guidance and the Institute of Fundraising code of conduct.

Ethical Fundraising

In soliciting and accepting gifts, donations, grants and sponsorships, TMT UK will accept funds for the general work of the charity, or a particular charitable programme, or current or planned project.

The TMT UK Trustees will agree to carry out checks on any large, unsolicited donations from organisations or individuals to confirm the donor's motives for donating, confirm the authenticity of the connection with our charity and ascertain where the funds originated as outlined in specified in our Donor Charter. The financial manager will comply with all banking compliance requirements and checks regarding the authenticity and origins of donor funding and will provide details of donors where required for the banks due diligence.

The charity will not consider a joint venture or commercial relationship with any organisation or company whose core business is deemed to be in conflict with our own and will carry out compliance checks before entering into partnership with any other organisation.

The charity is entirely independent and holds its own views, and asserts the right to do so even though such views may conflict with the views of the donor. The charity reserves the right to criticise the actions of a corporate donor and/or business partner, if the charity believes the company is not acting in the best interests of those sections of the public that the charity serves.

The Mango Tree UK does not and will not sell, hire out or otherwise pass on its database to any third parties unless required by law.

The Mango Tree UK will make every reasonable effort not to knowingly engage in joint promotions or sponsorship, solicit or accept offers of 'gifts in kind', or enter into any commercial agreement with companies, organisations or individuals acting on their behalf, who have reported, or suspected to be:

- Engaged in the trading of arms
- Engaged in testing on animals where there is no medical or health care priority

- In direct contradiction of The Mango Tree UK's equal opportunities policy
- Are not committed to due diligence regarding the implementation of child and adult safeguarding procedures

Data Protection & Security

The Mango Tree UK takes the privacy and security of all data we hold seriously.

We comply with all current guidance on Data Protection in line with the content of the Data Protection Act 1998 and the General Data Protection Regulations (GDPR) which come into force on 25th May 2018. The principles of the Data Protection Act 1998 are as follows:

Anyone processing personal data must comply with the eight enforceable principles of good practice. These state that data must be:

1. Fairly and lawfully processed
2. Processed for limited purposes
3. Adequate, relevant and not excessive
4. Accurate
5. Not kept longer than necessary
6. Processed in accordance with the data subject's rights
7. Secure
8. Not transferred to countries without adequate protection.

TMT UK will strive to observe the law in all collection and processing of data and will meet any access request in compliance with the law. We will only use data in ways relevant to carrying out our legitimate purposes and functions as a charity in a way that is not prejudicial to the interests of individuals. We will take due care in the collection and storage of all data and staff will do their utmost to keep all data accurate, timely and secure.

The Mango Tree Orphan Support Programme (charity reg: 1095767) will be what is known as the 'Controller' of the personal data provided to us by supporters, staff and beneficiaries who are supported by our projects. TMT UK will store the basic personal information which has been provided to us through standing order forms, letters, appeals responses and personal email and phone calls on no more than three secure, password protected devices. This information may include donor's name, title, postal addresses, email addresses, work addresses and phone numbers.

We store data using an excel-based database, and saved on an organisational Dropbox online platform. Both the files and the platform are password protected. We use this to keep all our contact information and donation information. All the data we process is only stored, accessed and processed by three TMT UK personnel, the UK Director of Operations, Emily Wilder, the UK Finance Manager, Georgina Brooks and the UK Chair of Trustees, William Fulton.

No third parties have access to personal data unless the law allows them to do so. The Mango Tree will never sell, rent or share data to any other party.

We store basic personal data so we can provide our donors and supporters with regular newsletters, annual reports, fundraising emails, and information about events and appeals we are organising.

The Mango Tree records all donation information including the amount of the donation, the company, trust or foundation connected with the donor, which appeal the donation was for and

details of all transactions carried out through our website – i.e Just Giving. All anonymous donations are stored as amounts with no name or contact details.

The Mango Tree will adhere to donor personal data preferences including their preferred method of contact, gift aid status and mailing list options. We store the address details of donors who have gift aided their donations, and make a note on database system whether or not the donor wishes to receive further communication from us. The Mango Tree, is required under UK tax law to keep this basic personal data (name, address, contact details) for a minimum of 6 years after which time it will be destroyed.

All donor contact information will be securely stored until we are notified by the donor that they no longer wish us to hold their information or receive communication from us.

Our promise to our donors:

- The Mango Tree UK will only ever ask for personal information that is required for us to complete our work
- We will store personal data securely (both physically and digitally). It will only be accessible by staff that require it to complete their duties
- We will act honestly and in such a manner that donors are not misled.
- We will not knowingly disseminate false or misleading information or permit others it knows to be acting on its behalf to do so.
- We will ensure that our own activities do not damage the reputation of the voluntary sector.
- No third parties have access to any personal data unless the law allows them to do so.
- The Mango Tree will never sell, rent or pass on personal data to any other person or organisation.
- We will be open about how we intend to use personal data.
- Donors may request information on the data which The Mango Tree UK holds about them and can ask for the data to be corrected or deleted at any time.
- We will ensure all financial transactions with The Mango Tree UK are safe and secure.

The Mango Tree UK will ensure that its staff are provided with a copy of this Privacy Policy and understand they are contractually required to comply with this Policy and observe UK data protection laws when handling personal data.

Publication of this Policy

Copies of this Policy will be made available to all staff, volunteers and project beneficiaries or other interested parties (such as funders) upon request. It will also be accessible on the Policy page of TMT UK's website.

Review of this Policy

This policy will be reviewed by The Mango Tree UK trustees every year, and updated according to changes in legislation, and in response to situations or issues that may arise within the organisation. The Policy was revised in 2023 and will be reviewed in April 2024.

Complaints

Any complaint regarding the practice and implementation of this policy should be made in writing to the William Fulton, Chair of Trustees c/o Emily Wilder, UK Director 57 Bisley Road, Stroud, Gloucestershire GL5 1HF emily@themangotree.org