



Lighthouse Relief Privacy Policy

Introduction & Purpose of the Document

This Privacy Policy (hereinafter referred to as the "Policy") describes the manner in which non-profit organisation Lighthouse Relief, hereinafter referred to as "Lighthouse Relief" or "we" based in Athens, Greece, and Stockholm, Sweden, processes your data (hereinafter "Data").

For any questions you may have about processing your Data, feel free to contact us at: dpo@lighthouserelief.org.

About Lighthouse Relief

Lighthouse Relief is a civil non-profit organisation with the mission of providing support to refugees and asylum seekers, through psychosocial support on the mainland of Greece.

Section 1: Data Collected & Purposes of Collection

Section 1.1. Whose Data Does LHR Collect?

Newsletter Recipients & Website Visitors

When registering for our newsletters through our website, consent is given to receive newsletters. For newsletter registration, the information saved include - contact Information (email). Visitors consent to having their IP address and cookies stored.

General visitor data, such as the most commonly requested pages, are recorded on our website.

Private Donors

Contributors/donors register the information themselves, as a regular donor through bank or SMS or financial contribution given once through our website (Stripe), GlobalGiving, Paypal, or Swish.

Institutional Donors

In order to process Memoranda of Understanding with our partners and to fulfil tax or other legal obligations, we may retain the following a) Basic identification data (b) Unique Identification Data (Tax number) c) Contact Information (telephone number) and d) Finance information.



Volunteer

Prospective volunteers apply through a Google form on LHR's website. Information shared in the Google Form includes (1) Name and surname (2) Age (3) Phone number (4) Emergency Contact (5) Nationality (6) Sex (7) Email (8) Date of Birth .

When a volunteer is accepted they are asked to provide a passport number and a photo of their passport, as well as filling out a form with personal information that is forwarded to the authorities (i.e. camp management in Ritsona) where he/she will be volunteering. This information is recorded in our email-system and in our Google drive for a limited period of time not exceeding two months after the departure of the volunteer.

We may also receive volunteer applications and information from third parties such as IndieGo.

Volunteers in both locations provide their phone number and address of their accommodation which will be kept by Coordinators as long as the volunteers are present.

Volunteers also sign a Volunteer Agreement and a code of conduct that will be stored in the Google drive for a limited time not exceeding five years.

Applicants for Employment/Internships

Information is stored from the applicants' e-mail application. Information of applicants who move forward and are selected for an interview may be stored in the organisation's Google Drive. This will be stored for a limited time, as per Section 2.3. Candidates may also have to provide references from prior to being hired.

Employees

Information is provided by the employee prior to writing a contract of employment, as well as collected from the Tax Administration, public welfare institutions and public health service.

Refugee or Asylum Seeker

Information is obtained from a refugee when he/she provides their personal information in a conversation with representatives. This and other information observed may be used to track protection and mental health concerns, or might be reported to authorities during the week for security purposes. Other identifying information may be gathered through monitoring and evaluation initiatives, in order to keep track of the daily and weekly engagement.

Individuals may also provide identifying information (name) through consent gathering for photography/videography. These consent forms remain in the LHR Google Drive until the individual leaves Ritsona, or if they request for it to be rescinded at any point.



Other identifying information may be given to LHR by the representatives from the management of the refugee camp, as well as through other acts via the referral pathways.

Section 1.2 Why is this data collected?

A. Recruitment: LHR collects data listed above for the purposes of recruiting and engaging staff members including interns and volunteers for our programmes.

B. Human Resources: In order to manage employees and volunteers, LHR may gather information related to performance reporting, benefits, travel planning, annual leave, expenses, payroll processing, et cetera, in addition to the personal information listed above under "Employees" and "Volunteers"

C. Agreements with volunteers, employees, donors, suppliers and business partners: Personal data listed in section 1 may be collected and stored in order to execute agreements, including Volunteer Agreements and Donor Agreements/Memoranda of Understanding. Such agreements may also be executed to effect payment for services rendered, or goods purchased.

D. Donors relations and prospecting: LHR may gather the data listed above in order to track donations (this data can include visits to our website, analysis of donations logged through SquareSpace/Stripe or through GlobalGiving) and to engage existing donors (email addresses provided through our MailChimp platform).

This is also related to gathering information from institutional donors for Memoranda of Understanding, or information from entities providing in-kind donations.

E. Information sharing: To keep subscribers informed of our activities through our MailChimp platform.

F. Monitoring and Evaluation, Organisational Analysis: Website analytics and social media analytics may fall under this category, in addition to information gathered from beneficiaries for monitoring and evaluation purposes (including age, nationality, languages spoken). As regards cookies, the purpose of collecting this general information on visits to the website is to optimise the design of the website.

G. Providing information to authorities: This can include sending volunteer information listed in the prior section to authorities, as well as sending information to camp management of Ritsona to notify them of LHR volunteers, staff and visitors to the camp.

H. Consent for likeness to be used: LHR may gather name and signatures of individuals saved to our Google drive to track who has provided consent to be photographed; or for their works to be shared on our social media channels.

I. Creative Works for LHR's Ritsona Kingdom Journal, Communications Initiatives:

LHR may gather visual or written works from residents of Ritsona or from volunteers in order to share on our social media channels.

J. Protection Concerns: Programme managers in Ritsona Camp may gather information from residents facing protection concerns (with consent) in order to transmit this information to track protection cases and to submit pertinent information to the relevant protection actors.

K. Internal communications - In order to facilitate communication and information sharing amongst staff, volunteers, and other stakeholders, LHR may create Whats App groups and share internal newsletters.

Section 2: Storage and Access to Data

Section 2.1 Who has access to your data?

- 1) **Relevant Staff:** Only the relevant programme staff will have access to your data - ie, for Ritsona volunteers, only Ritsona staff has access to your data.
- 2) **Third party applications:** Such as PayPal, Stripe may access your data with your consent.
- 3) **Board of Directors of LHR:** Only as it regards the BoD's responsibilities and legitimate interest, members of the BoD may have access to staffing data and recruiting data, as well as website analytics or donor information if it is within their realm of interest.

Section 2.2 Where is the Information Stored/Collected & Privacy Statements If Applicable

- Tax Administration in Sweden
- Local authorities at our locations
- GlobalGiving, privacy statement [here](#).
- Paypal, privacy statement [here](#).
- WhatsApp, privacy statement [here](#).
- MailChimp, privacy statement [here](#).
- Google Drive, privacy statement [here](#).
- Stripe, privacy statement [here](#).
- SquareSpace, privacy statement [here](#).

Section. 2.3. For how long does LHR retain your data?

LHR retains your Data for as long as your contract lasts or for as long as it takes to carry out our actions, unless it is deemed necessary to prolong this period based on LHR's legitimate interests and legal bases (outlined below).

Section 3: Legal Basis & Rights

Section 3.1: What is the legal basis for collecting this data?

- Contractual relationship
- Consent, where required
- Legal obligations of Lighthouse Relief
- Legitimate interest of Lighthouse Relief

Lighthouse Relief will not process or collect data for any purpose outside of what is listed above, and will only do so after obtaining your explicit consent to do so.

Section 3.2 What are your rights?

- Right to Information / Transparency: You have the right to know who is processing your data, what it is and why.
- Right to access: You have the right to request free access to your Data.
- Right to correction: You have the right to request the correction of inaccurate personal data and the completion of your incomplete data.
- Right to delete ("right to be forgotten"): You have the right to request the deletion of Data, under certain conditions, ie, the data is no longer necessary.
- Right to restrict processing: You have the right to ask us to limit the processing of your Data while we review objections to data processing.
- Right to data portability: You have the right to request the transfer of your Data to another controller.
- Right to oppose: You have the right to object to the processing of your Data, and LHR will comply with this request unless legitimate and legal interest prevails.
- Right to withdraw consent: You may withdraw your consent at any time.