Privacy Notice

We are committed to protecting your personal information and are being transparent about what we do with the personal information regardless of how your relationship is with us. This includes if you want to become a member, work, volunteer or advocate for us, donate, buy goods or use our services, want information, training or want to learn more about what we do.

We are committed to using your personal information in accordance with our responsibility. We are required to provide you with the information in this Privacy Notice under the applicable law which includes:

Personal Data Protection Act 2010

We will not do anything with your information that is not reasonably expected of us.

Processing of your personal information is carried out by or on behalf of the Malaysian Red Crescent Society, created by Act 540, the Malaysian Red Crescent Society (Incorporation) Act 1965 and Act 162, the Malaysian Red Cross Society (Change of Name) Act 1977.

This notice, together with our website <u>terms and conditions</u> and our <u>cookies</u> <u>policy</u> tells you about how we collect, use and protect your personal information.

If you have any queries about our Privacy Notice, please contact us at;

Malaysian Red Crescent National Headquarters

Lot PT54, Lengkok Belfield, Off Jalan Wisma Putra, 50460 Kuala Lumpur, Malaysia

Telephone: (+60)3 2143 8122

Fax: (+60)3 2143 5122

Email: secgen@redcrescent.org.my

How and when we collect information about you

When you directly give us information

We may collect and store information pertaining to you when you interact with us. This include situation such as follows;

- support our work through a donation
- fundraise on our behalf
- register for an event
- tell us your story
- buy goods from our online shop
- submit an enquiry
- register for or use our services
- participate in our training

- give us feedback
- make a complaint
- use one of our apps
- apply for a job
- register as a volunteer
- enter into a contract with us
- when you are captured by CCTV recording.

When you indirectly give us information

If you interact with us on social media platforms such as Facebook, WhatsApp, Twitter or LinkedIn we may also obtain some personal information about you. The information we receive will depend on the privacy preferences you have set on each platform and the privacy policies of each platform. To change your settings on these platforms, please refer to their privacy notices.

We may obtain information about your visit to our site, for example the pages you visit and how you navigate the site, by using cookies. Please visit our **cookies policy** for information on this.

What information we might collect

If you engage with us including by phone, email, ordinary mail, in person or online, we may collect information pertaining to you (referred to in this Privacy Notice as 'personal information'). This may include your name, address, email address, telephone number, date of birth, job title and details of your education and career, reason why you are interested in Malaysian Red Crescent Society, and other information relating to you personally which you may choose to provide to us.

Data protection law recognises that certain types of personal information are more sensitive. This is known as 'sensitive' or 'special category' personal information and covers information revealing racial or ethnic origin, religious or philosophical beliefs and political opinions, trade union membership, genetic or biometric data, information concerning health or data concerning a person's sex life or sexual orientation.

Sensitive information will only be collected when necessary. Example, we may need to collect health information from you when you register for an event or deliver a community service as a volunteer or a member Clear notices will be provided at the time we collect this information, stating the type of information needed, and the reason for it.

With your explicit consent, we may also collect sensitive personal information if you choose to tell us about your experiences relating to our services for use in a case study.

If you're under 18

If you're aged under 18, you must get your parent/guardian's permission before you provide any personal information to us.

How and why we use your information

We will use your personal information for the following purposes:

- **Donation processing**: We will process personal information you provide in order to administer any one-off or on-going donations you make.
- **Responding to a request**: If you contact us with a query, we may use your personal information to provide you with a response.
- Fundraising or direct marketing: We will only send you marketing information by email, SMS, or phone if you have given us specific consent. If you withdraw your consent and then subsequently opt in to receive marketing information again, then your most recent preference may supersede. If you respond to a fundraising appeal by post, you may also receive fundraising mail, which you can opt out of at any time.
- **Monitoring and Evaluating**: We may use your information in order to improve current and future delivery of our services.
- Co-production: We may invite you to participate in projects or initiatives which among others, may enable you to help develop or review our services, or shape our research, media, policy and advocacy activity. Participation is always voluntary. Your decision to participate will not affect you accessing a Malaysian Red Crescent service. No individuals will be identified as participating in co-production projects, unless they explicitly consent to this.
- Family Reunion: As part of our International commitment to reuniting families separated by armed conflict or other situations of violence; natural or man-made disasters; migration; we may review the data we already hold on our systems in order to establish a link. Once identified we will only share this information if we have your explicit consent.
- **Processing an application to work with us**: We may process your information if you send or fill in an application form or send us your CV or details in respect of an opportunity to work with us in order to evaluate your suitability. We may only respond to your application if you are being sublisted.
- **Transactional purposes**: We will need to use your personal information in order to carry out our obligations arising from any contracts entered into between you and us for goods or services, for example, processing your order and payment for a product from our online shop.
- **Providing and developing our website**: We may use your personal information to help provide you with access to our website, personalise your experience, and improve and develop it further.
- **Administration**: We may use your personal information to record and deal with a complaint, record a request not to receive further marketing information, record what our volunteers have done for us, and for other essential internal record keeping purposes.
- **Prevention of crime**: We may record your image on CCTV which we use to prevent crime and keep our people and the public safe.
- **Protecting your vital interests**: We may process your personal information if we reasonably think that there is a risk of serious harm or abuse to you or any other third party.
- **Market research and surveys**: We may invite you to participate in surveys or market research to help us improve our website, fundraising, services and

strategic development. Participation is always voluntary and no individuals will be identified as a result of this research, unless you consent to us publishing your feedback.

- **Legal, regulatory and tax compliance**: Where required we are subject to a legal obligation, we may process your personal information to fulfil that obligation.
- **Profiling and analysis**: We may occasionally for the purposes of our legitimate interests use your personal information to conduct profiling of our supporters or potential supporters. This will help us target communications in a more focused, efficient and cost effective way, helping us reduce the chances of supporters and potential supporters receiving inappropriate or irrelevant communications. You can object to such use of your personal information for profiling at any time by contacting us at the details set out at the end of this Privacy Notice.

Our profiling and analysis activities can be broken into five categories:

1. Data matching

We may combine the personal information you have given us with data obtained from external sources to infer the likely social, demographic and financial characteristics, so we can tailor our communications and services to better meet your needs or the needs of others like you based on the insight we gain from the profile we build. We will not use the results of this data matching activity in a way that intrudes on your privacy or your previously expressed privacy preferences.

2. Segmenting

We conduct analysis of supporters by group, post code or particular area where supporters may be based. This is to ensure that campaigns or mailings are sent to those who will be most interested or likely to respond. This type of activity is not aimed at identifying specific individuals to target, but rather many individuals who may fall within a certain segment of supporters.

3. Major donor analysis

We may carry out research to determine whether an individual could be a potential major donor. We may use publicly available information from third party sources such as Google; published biographies and publicly available LinkedIn profiles. The type of information we collect can include:

- career overview
- gift capacity
- areas of interest
- history of giving to us and others
- how the individual is connected with us and others
- public information on any philanthropic activities.

4. High value event planning

We may also use profiling to produce short biographies of people who are due to meet with our leadership or attend an event that we may be hosting.

This helps our people to understand more about those we engage with, and their interests or connection to us.

5. Ethical screening and minimising risk

As a registered charity, we are subject to a number of legal and regulatory obligations and standards. The public naturally expect charities to operate in an ethical manner and this is integral to developing high levels of trust and demonstrating our integrity.

This means that we may carry out appropriate due diligence of donors, check donations and implement robust financial controls to help protect the charity from abuse, fraud and/or money laundering.

We may carry out background checks and due diligence on potential donors or anyone planning on making a significant donation or gift before we can accept it.

We may also ethically screen supporters to minimise risk of creating an association with an individual or group that conflicts with the standards we have.

Who do we share your information with?

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

We will only share your data for the following purposes:

- 1. Third party suppliers: We may need to share your information with data hosting providers or service providers who help us to deliver our services, projects, or fundraising activities and appeals. These providers will only act under our instruction and are subject to pre-contract scrutiny and contractual obligations containing strict data protection clauses.
- 2. Where legally required: We will comply with requests where disclosure is required by law, for example, we may disclose your personal information to the government for tax investigation purposes, or to law enforcement agencies for the prevention and detection of crime. We may also share your information with the emergency services if we reasonably think there is a risk of serious harm or abuse to you or someone else.

We always aim to ensure that personal information is only used by those third parties for lawful purposes in accordance with this Privacy Notice.

How we protect your information

We use technical and corporate organisational safeguards to ensure that your personal information is secure. We limit access to information on a need-to-know basis and take appropriate measures to ensure that our people are aware that such information is only used in accordance with this Privacy Notice.

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.

Our online forms are always encrypted and our network is protected and routinely monitored.

If you use your credit or debit card to donate to us, buy something or make a booking online, we pass your card details securely to our payment processing partners. We do this in accordance with industry standards and do not store the details on our website.

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 data (including personal information) disclosed or transmitted over public networks.

Vulnerable circumstances

We understand that additional care may be needed when we collect and process the personal information of vulnerable supporters and volunteers. In recognition of this, we observe good practice guideline in our interactions with vulnerable people.

How long will we keep your information?

We will keep your personal information in respect of financial transactions for as long as the law requires us to for tax or accounting purposes (which may be up to six years after a specific transaction).

If you request that we stop processing your personal information for the purpose of marketing we may in some instances need to add your details to a suppression file to enable us to comply with your request not to be contacted.

In relation to other personal information, we will retain it for no longer than is necessary for the purposes to which it was collected.

International transfers of information

It may be necessary for us to transfer your personal information outside Malaysia if any of our sister National Societies, International Federation of Red Cross and Red Crescent Societies (IFRC), International Committee of the Red Cross (ICRC) or strategic partners (international or overseas entities) who are involved in providing support to Malaysian Red Crescent personnel (staff, volunteers, members and youth) and their family members are located in countries outside Malaysia for the purposes of security measures, insurance, repatriation and others.

You consent to us transferring your personal information outside Malaysia in these instances. We shall take reasonable steps to ensure that any such overseas entities are contractually bound not to use your personal information for any reason other than to provide the Services they are contracted by us to provide and to adequately safeguard your personal information.

Your rights to your personal information

Data protection legislation gives you the right to request access to personal information about you which is processed by the Malaysian Red Crescent and to have any inaccuracies corrected.

You also have the right to request that we erase your personal information, restrict us from processing your personal information or object that we process your personal information.

If you wish to exercise these rights, please complete **this request form** (PDF)

Kindly provide any additional information which is relevant to the nature of your contact with us, as this will help us to locate your records.

We will respond within 30 days, on receipt of your written request.

How to make a complaint or raise a concern?

If you would like more information, or have any questions about this policy, to make a formal complaint about our approach to data protection or raise privacy concerns please contact the Secretary General at;

Malaysian Red Crescent National Headquarters

Lot PT54, Lengkok Belfield, Off Jalan Wisma Putra, 50460 Kuala Lumpur, Malaysia

Telephone: (+60)3 2143 8122

Fax: (+60)3 2143 5122

Email: secgen@redcrescent.org.my

Changes to our Privacy Notice

Our Privacy Notice may change from time to time, so please check this page occasionally to see if we have included any updates or changes, and that you are happy with them. (Last updated: 2 January 2020)