



Medicine for those in need

# IHP's PRIVACY POLICY

## Introduction and General Terms

International Health Partners (IHP) are committed to managing your personal information in accordance with current legislation and best practice. Our aim is to be responsible, relevant and secure when using your data. This Privacy Policy is intended to give you an understanding of what to expect from us.

Our website <https://www.ihpuk.org> (IHP website) is owned and operated by International Health Partners (UK) Ltd. Unit 402, Clerkenwell Workshops, 27/31 Clerkenwell Close, London EC1R 0AT. Tel: +44 (0) 20 3735 5489. We are registered as a charity in England & Wales (1105455) and a company limited by guarantee (5044723). IHP is also the operator of and Data Controller for the EURMED system <http://ihdcloud.com/> (EURMED website) and this Privacy Policy also applies to the EURMED system.

Colleen Harrison-Dodds is our Data Protection Officer and responsible for data protection compliance. If you have any questions about this Privacy Policy, please contact us at [info@ihpuk.org](mailto:info@ihpuk.org) or call +44 (0)20 3735 5489. This Privacy Policy may be updated from time to time, so you may wish to check it when you next submit personal information. If material changes are made to this Privacy Policy, we will notify you by placing a prominent notice on our website.

## Key Terms

**Personal Information:** Any data that allows you as an individual to be identified.  
This includes a work email.

**Processing:** Any activity which involves the use of your personal data, eg entering onto a database, emailing you, storing data, alteration, retrieval, etc.

## How we collect information about you

We may collect personal information from you when you provide information to us in the following ways:-

- You visit our website
- You, or the organisation you represent, make a donation to us (which may be financial or non-financial/in kind)
- You help us process a donation of medicines or medical products from the company you represent or are interested in product donation and becoming a partner of IHP
- You contact us from an organisation delivering medical aid that is a partner of IHP or is interested in becoming a partner
- You contact us about our Essential Health Pack (EHP) programme
- You register as a user on the EURMED system
- You provide a service to IHP, eg freight company, warehousing or professional service such as design agency
- You apply for a job with IHP or want to volunteer in some way
- You request to go on our mailing list
- You attend an IHP event or make contact with IHP at an event where we are present
- You contact us with other enquiries, including via social media, indicating that you would like to know more

- Where information is publicly available and IHP believes you may be interested in our work, including making a gift to us. Sources of information may include media coverage and data from Companies House.

If you interact with us in one of the ways listed above we may collect and process personal information about you such as:

- Your Internet Protocol (IP) address, unique device identifiers, your browser settings and specification and information about how you use our website (eg the pages you view the links you click, features and functionalities you use, how frequently you access our website and other actions you take on our website)
- your name, address, email address, telephone number, Skype address and, if you register as a user on the EURMED system, your password
- Information you enter onto our website or on other hard copy forms at an event
- If you are a user of the EURMED system, data you upload or enter on the system
- Records of your correspondence with us, if you have contacted us
- Financial information such as your bank or card details and whether you are a UK taxpayer
- Whether you have a relationship to another supporter (for example, husband/wife)
- Details of your medical qualifications and right to practice and workplace address (for example, to be eligible to receive an EHP or be the named medical professional in a partner organisation)
- When you access our website with a mobile device, we may collect and store a unique identifier associated with your device (including, for example a UDID, Unique Identifier for Advertisers (IDFA), Google Ad ID, or Windows Advertising ID), or information about your mobile carrier, device type, model and manufacturer, and mobile device operating system brand and model).

## Why and how we use your information and on what basis

We will process your personal information for one or more of the following reasons:

- To comply with applicable laws and regulations, including our obligations as a WDA Wholesaler License Holder, under the Human Medicines Regulations 2012, or to comply with tax or commercial laws or where we are required by law enforcement to provide personal data on request
- To administer a donation, including processing Gift Aid, Stewardship, etc.
- To provide you with the services, activities or information you have indicated you are happy to receive or which you have asked for
- To fulfil the terms of our contract or agreement with you
- For internal administrative purposes and to keep a record of your relationship with us, including any request to opt out of our periodic communications
- For marketing purposes, including providing information about the services IHP provides (eg EHPs), soliciting donations, supporter updates and how you can help us achieve access to medicine for all
- To provide important updates about IHP events, training opportunities, other activities and to notify you of changes to our service
- To invite you to attend an IHP event
- If you are a user of the EURMED system, to facilitate the operation of the system and arrange for donations of medical supplies to recipient organisations and end users
- To undertake due diligence on the individuals and organisations we work with
- For the reasons described under "Cookies and Similar Technologies" below.

Where the law allows us, in order to improve the accuracy of our information, we may check this against external data lists where these are in the public domain (eg Royal Mail). This Privacy Policy governs the handling of information obtained from public sources that is combined with your personal information.

In some cases, we may ask you to grant us a separate consent to use your personal data. You are free to deny your consent and the denial will have no negative consequences for you. You are free to withdraw your consent at any time with effect for the future. If you have granted us consent to use your personal data, we will use it only for the purposes specified in the consent form.

## How long will we keep your personal information?

We will retain personal information for no longer than is necessary for the purposes which it is processed. In determining how long we keep information we will take into consideration legal and contractual obligations, as well as reasonable expectations and requirements of the different types of individuals that we relate to. For example:

- if you request no further contact from IHP we will keep some basic information in order to avoid sending you unwanted materials in the future
- under our legal requirements, we may need to retain some information for over five years, eg financial processing for HMRC and regulatory compliance for the Medicines and Healthcare Products Regulatory Authority (MHRA)
- if you have taken an EHP from us in the past, we will hold your information for five years for regulatory purposes and to offer this service for future work. After this time, we will seek consent to continue to process your information.

For individual supporters of IHP we will generally treat any marketing consent you give us as lasting for 24 months, but will apply the following exceptions:

- Where you have committed to giving us a regular donation.  
In this situation, and unless you withdraw your consent, we will treat your consent as enduring until you cancel your donation, at which point your consent will expire 24 months after the last donation. This is to enable us to keep you up to date with the impact of your gifts, and to ask whether alternative means of support would be of interest.
- Where you have notified us that you will be leaving a legacy to IHP.

## Where your information is stored and how IHP protects this?

IHP has physical, technical and procedural safeguards in place to protect your information.

IHP works with reputable providers of software who like us, take the security of your personal information seriously. This includes EURMED (hosted by Amazon Web Services, a subsidiary of Amazon.com, Inc.) and Microsoft Office 365. Online payments made through our website are processed securely via BBMS Blackbaud Merchant Services and BBPS Blackbaud Payment Services.

The transmission of information via the Internet is not completely secure (though we note that online payment transactions are securely encrypted). Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our site; any transmission is at your own risk. Certain data breaches must be reported to the supervisory authority, without undue delay and where feasible within 72 hours.

## Cookies and Similar Technologies

Our website uses cookies, flash objects, web beacons, file information and similar technology similar technologies to distinguish you from other users of our website. This helps us to provide you with a good experience when you browse our website and also allows us to improve our website.

Cookies are pieces of code that allow for personalization of your experience on our website by saving your data such as user ID and other preferences. A cookie is a small data file that we transfer to your device's hard disk (such as your computer or smartphone) for record-keeping purposes.

We use the following types of cookies:

- Strictly necessary cookies. These are cookies that are required for the essential operation of our website such as to authenticate users and prevent fraudulent use.
- Analytical/performance cookies. These allow us to recognize and count the number of visitors and to see how visitors move around our website when they are using it. This helps us to improve the way our website works, for example, by ensuring that users are finding what they are looking for easily.
- Functionality cookies. These are used to recognize you when you return to our website. This enables us to personalize our content for you and remember your preferences (for example, your choice of language or region).

- Targeting cookies. These cookies record your visit to our website, the pages you have visited and the links you have followed. We will use this information to make our website and the information displayed on it, and the marketing messages we send to you more relevant to your interests. We may also share this data with third parties who provide a service to us for this purpose.

How to manage cookies? The cookies we use are designed to help you get the most from our website but if you do not wish to receive cookies, most browsers allow you to change your cookie settings. Please note that if you choose to refuse cookies you may not be able to use the full functionality of our website. These settings will typically be found in the "options" or "preferences" menu of your browser.

We also use clear gifs in HTML-based emails sent to our supporters and donors to track which emails are opened and which links are clicked by recipients. The information allows for more accurate reporting and improvement of our services. You can set your e-mail options to prevent the automatic downloading of images that may contain these technologies that would allow us to know whether you have accessed our e-mail and performed certain functions with it.

If you would like to find out more about cookies and other similar technologies, please visit [www.allaboutcookies.org](http://www.allaboutcookies.org) or the Network Advertising Initiative's online sources at [www.networkadvertising.org](http://www.networkadvertising.org).

## Who we share your data with?

Your personal information will never be made available to third parties for commercial purposes.

We may allow our staff, consultants and/or external providers acting on our behalf to access and use your information for the purposes for which you have provided it to us (eg to deliver mailings, to analyse data and to process payments) or for purposes set out in this Privacy Policy. We only provide them with the information they need to deliver the relevant service and we make sure your information is transferred securely and treated with the same level of care as if we were handling it directly.

We may disclose your information to other organisations and agencies if we are under a duty to disclose or share it in order to comply with any legal obligation, or in order to enforce or apply any agreements; or to protect the rights, property or safety of us or others. For example, we may share your information with HMRC for the purpose of administering Gift Aid.

In accordance with our Protection of Children and Vulnerable People Policy, we may share details, including personal data, with statutory authorities such as the police, the National Crime Agency (NCA), the Child Exploitation and Online Protection Agency (CEOP) and the Charity Commission.

## Children

IHP does not knowingly collect personal information from children under the age of 13. If you are a parent or guardian of a child under the age of 13, and believe that your child may have provided us with personal information, please contact us at [info@ihpuk.org](mailto:info@ihpuk.org) and we will use commercially reasonable efforts to delete that information.

## Your Rights

You are in control of the personal information you provide to IHP and have certain rights to that personal information. This includes:-

**Access to your personal information.** When contacting us about your personal information, we may request specific information from you to confirm your identity and right to access, as well as to search for and provide you with the personal information that we hold about you. Your right to access the personal information that we hold about you is not absolute. There may be instances where applicable law or regulatory requirements allow or require us to refuse to provide some or all of the personal information that we hold about you.

**Updating Your Personal Information.** It is important that the information contained in our records is both accurate and current. You have the right to request that we correct your personal information if it is inaccurate or incomplete.

**Erasing, Restricting or Transmitting.** You have the right to request that we

- erase your personal information without undue delay in certain circumstances, such as where the personal information is no longer necessary in relation to the purposes for which it was collected or processed
- restrict our processing of your personal information in certain circumstances, such as where the accuracy of the personal information is contested by you, for a period of time enabling us to verify the accuracy of that personal information
- transmit certain personal information to another data controller.

You also have the right to object to our processing of your personal information where there are grounds relating to your particular situation. You can object to marketing activities for any reason whatsoever.

These rights are subject to legal requirements and/or other obligations.

**Preference.** You can withdraw consent for IHP to use your personal information for marketing purposes. To exercise this right use the unsubscribe link located in any of our email communications, or contact us at [info@ihpuk.org](mailto:info@ihpuk.org).

To exercise any of these rights please contact us at [info@ihpuk.org](mailto:info@ihpuk.org) Tel: +44 (0) 20 3735 5489 or by post to International Health Partners (UK) Ltd., Unit 402, Clerkenwell Workshops, 27/31 Clerkenwell Close, London EC1R 0AT.

You also have the right to make a complaint direct to the UK's data protection authority, the Information Commissioner's Office (ICO). The ICO can be contacted at: <https://ico.org.uk/global/contact-us/>.

Concerns can also be logged via the ICO website - <https://ico.org.uk/>.

In addition, any EU resident also has the right to lodge a complaint with your local data protection authority. Further information about how to contact your local data protection authority is available at [http://ec.europa.eu/justice/data-protection/bodies/authorities/index\\_en.htm](http://ec.europa.eu/justice/data-protection/bodies/authorities/index_en.htm)

This Privacy Policy was last revised on 23 May 2018.