



Digital Inclusion Privacy Policy

Introduction

Digital Inclusion is an independent non-profit organization. Our goals are to make information technology accessible to everybody, to promote social inclusion through digital technology, and to take action for the environment through the repair and reuse of digital equipment.

Digital Inclusion is committed to protecting your personal information and our Privacy Notice gives you detailed information about when and why we collect your personal information, how we use it and how we keep it secure.

Legal Basis for collecting and processing information about you

Digital Inclusion collects data about you on the legal basis of its **legitimate interests** in order to provide you with access to our services including computer and smartphone distribution and educational courses.

Whenever we collect information about you under the 'legitimate interests' lawful basis we make sure that we take your rights and interests into account and will not process information if this puts your rights at risk.

When we collect information

Digital Inclusion collects information from you when you or a referee contact us to request a computer or smartphone, to register for a course or a volunteering position by email or in person, or via a third party.

Digital Inclusion collects information about you from people and organisations who refer you to Digital Inclusion for access to services we provide.

Digital Inclusion does not currently collect information through cookies on our website. If this changes, we will update our privacy policy.

Information We Collect

Personal information we collect includes your name, address, email address, telephone number, and identification numbers (including but not limited to OLAI and CNS). We may also collect data that may not be identifying but that may be considered sensitive, such as employment status, country of origin, disability, and migrant status.

The purpose of collecting this data is to monitor our services to make sure they are accessible to everyone who is entitled to use them, and to help us to make improvements or develop new services. In some cases, this information is required by our funders. This information is kept

securely and is only shared with project funders where this is a condition of receiving funding. The identity of the funders will always be made clear so that you may contact them for more information.

Because your personal data is essential for establishing eligibility, project monitoring, and fraud prevention, we cannot provide our services if you choose not to share it. However, some sensitive data is not essential for certain projects, and in those cases your access to our services will not be restricted if you choose not to provide us with these details.

How We Use Your Data

We collect information about you in order to:

- Provide you with services you have asked for such as our computer re-use project, educational classes, or our volunteer computer repair learning program, including communications about those services
- Make improvements or develop new services
- Seek your views or comments on the services we provide
- Notify you of changes to our services

And, if you have agreed:-

- Send you details of our events and activities, news, and ways in which you can support our work, including donation campaigns

We also use anonymised data about the age, nationality, migrant status, and location of the people who use our services in order to:

- Demonstrate that we are spending money given to us in donations, grants and contracts according to our charitable purpose
- Demonstrate that we are meeting any contractual or legal obligations we may have
- Ensure that our services are fully accessible and to enable us to design improvements or new services

How We Share Information

Digital Inclusion does not share your information with any third parties except in the case where this information is required by our funders. The identity of the funders will always be made clear so that you may contact them for more information. We will only share your information with them if you have signed a form giving us permission to do so in advance.

We will never:

- Collect or share more data than is necessary to the service that is being provided

- Sell your data to third parties
- Use your data for anything other than our stated purposes.

Data Security and Retention

Your data is stored securely in both our physical filing system, and on our cloud-based storage system. Our physical files are kept in locked storage, while our cloud-based storage is available only to registered users who have usernames and passwords to access the system.

The data we have collected will be stored securely in line with our legal requirements, and the requirements of our funders. Our retention policies are reviewed regularly to ensure they comply with legislation and best practice.

Marketing

Digital Inclusion **will not** sell, rent or otherwise share your information with third parties for marketing purposes.

If you sign up to our newsletter, we **will** send you information about our services, and updates relating to our projects, events, and other targeted communications.

If, at any time, you decide you no longer wish to receive this information from us simply let us know and we will remove your details from our mailing list. To do this you can use the “unsubscribe” link at the foot of our newsletter emails or send an email to info@digital-inclusion.lu

Your Data Protection Rights

From 25th May 2018 your rights under the General Data Protection Regulation are as follows:

You have the right to:

1. Rectification
If any of the data we hold about you is incorrect or incomplete you have the right to have it corrected.
2. Object
You have the right to object to the way your data is processed.
3. Make a Subject Access Request
You have the right to ask for a copy of all the data we hold about you.
4. Refuse automated decision-making
Digital Inclusion does not use profiling or automated decision-making.
5. Restrict
You have the right to ask us to stop processing your data until the data has been corrected or until it is established that the data is being processed in accordance with the law.

6. Erasure

You can withdraw consent for us to hold your personal data at any time and where the data is not needed for legal or statutory purposes we will delete this information if you ask us to do so. Once your data has been deleted it cannot be retrieved.

7. Portability

You have the right to have your data provided in a machine-readable form so that you can transfer it to another provider.

If you would like a copy of some or all of your personal information or to exercise one of the other rights, please write to us at info@digital-inclusion.lu letting us know what specific information or action you would like. Please note that in order to establish your identity we will need to undertake security checks and will use the details already recorded on our system to contact you.

Our website

Our website does not currently use cookies to collect information about online visitors. If this changes, we will update our privacy policy.

Our website contains links to other websites. This privacy policy only applies to our website and services so when you link to or from other websites you should read the privacy policies on that site.

Minors (17 and under)

Most of our services are only available to adults (18+). In the cases where we accept applications from minors (computer distribution to MNAs, Smartphone distribution to 14+, and volunteers aged 16+ on our volunteer learning programme) we require a parent or legal guardian's presence and/or permission for the minor to access our services. In these cases we will collect only the personal data required to deliver the service, and only with the written permission of the parent or legal guardian.

Transferring your information outside of Europe

As part of the services offered to you, the information which you provide to us may be transferred to servers within the European Union ("EU") or countries and companies designated as adequate under the General Data Protection Regulation and provide similar protection to those located in Luxembourg.

If you use our services while you are outside the EU, your information may not be governed by legislation to the same standard and we are not able to guarantee the security of your information.

Changes to our Privacy Policy

We keep our Privacy Policy under regular review and will put updates on our website.

Complaints

If you have any concerns or complaints about the way we handle, process or protect your data please contact us in the first instance using the contact details provided below.

If you are unhappy with our response or you would like to report your concerns, the regulatory body in Luxembourg is the Commission Nationale de la Protection des Données. Visit their website for more information on how to report your concerns: <https://cnpd.public.lu/>

Contact Us

You may contact us by email at info@digital-inclusion.lu or by post at:

Digital Inclusion
16, rue d'Épernay
L-1490
Luxembourg

This Privacy Policy was last updated on 14 January 2020.