

## ProSave privacy policy for suppliers

This Privacy policy describes our current practices for the gathering and use of information from users of our ProSave self service module that register as prospective suppliers to Save the Children International ('SCI'). SCI takes the privacy of your information very seriously. This privacy policy applies to our use of any and all Data collected by us or provided by you in relation to your use of the ProSave system.

This Privacy policy is to be read in conjunction with our website Privacy Statement that can be found via this link: <https://www.savethechildren.net/privacy>

Please read this privacy policy very carefully.

### Definitions and interpretation

1. In this privacy policy, the following definitions are used:

<b>Data</b>	collectively all information that you submit to SCI via the ProSave module. This definition incorporates, where applicable, the definitions provided in the Data Protection Laws;
<b>Data Protection Laws</b>	any applicable law relating to the processing of personal Data, including but not limited to the Directive 96/46/EC (Data Protection Directive) or the GDPR, and any national implementing laws, regulations and secondary legislation, for as long as the GDPR is effective in the UK;
<b>GDPR</b>	the General Data Protection Regulation (EU) 2016/679;
<b>Save the Children International (SCI) , or us</b>	Save the Children International is a company limited by guarantee, registered in England and Wales with company number 3732267 and a charity registered in England and Wales with charity number 1076822
<b>User or you</b>	any third party that accesses the ProSave module and is not employed by SCI and acting in the course of their employment
<b>ProSave</b>	the module of the cloud based software you are using to register as a prospective supplier to SCI, and any sub-modules of this module unless expressly excluded by any relevant terms and conditions.

2. In this privacy policy, unless the context requires a different interpretation:

- a. the singular includes the plural and vice versa;
- b. references to sub-clauses, clauses, schedules or appendices are to sub-clauses, clauses, schedules or appendices of this privacy policy;
- c. a reference to a person includes firms, companies, government entities, trusts and partnerships;
- d. "including" is understood to mean "including without limitation";
- e. reference to any statutory provision includes any modification or amendment of it;
- f. the headings and sub-headings do not form part of this privacy policy.

### **Scope of this privacy policy**

3. This privacy policy applies only to the actions of SCI and Users with respect to ProSave. It does not extend to any website that that is used to access this module.
4. For purposes of the applicable Data Protection Laws, SCI is the "Data Controller". This means that SCI determines the purposes for which, and the manner in which, your Data is processed.

### **Data collected**

5. We may collect the following Data, which includes personal Data, from you:
  - a) name;
  - b) contact Information such as email addresses and telephone numbers;
  - c) financial information such as bank details;
  - d) company name.

in each case, in accordance with this privacy policy.

### **How we collect Data**

6. We collect Data in the following ways:
  - a) data is given to us by you; and
  - b) data is received from other sources.

### **Data that is given to us by you**

7. SCI will collect your Data in the following ways;
  - a) when you supply your details electronically through the ProSave cloud based module, and

- b) when you provide your details (by any means such as emails, telephone or in writing) to SCI employees who will input your details into the ProSave Module.

in each case, in accordance with this privacy policy.

#### **Data that is received from third parties sources**

- 8. We will receive Data about you from the following third party sources:
  - a. companies house; and
  - b. your employer/company website.

#### **Our use of Data**

- 9. Any or all of the above Data may be required by us from time to time in order to provide you with the best possible service and experience when using the ProSave Module. Specifically, Data may be used by us for the following reasons:
  - a) to register you as a prospective supplier of services to SCI;
  - b) to communicate with you via telephone, email, post, or any other appropriate means;
  - c) to facilitate payment for the services you may provide to us;
  - d) to verify your legal status as part of normal business operations, including verifying that any prospective supplier is not designated or prohibited parties according to UN or governmental lists;
  - e) internal record keeping and auditing reasons;
  - f) improvement of our products / services;
  - g) in order to facilitate your rights as set out in this policy; and
  - h) to comply with any legal obligation that SCI may be bound by.

in each case, in accordance with this privacy policy.

- 10. We may use your Data for the above purposes if we deem it necessary for the performance of contract that may arise between us, to comply with a legal obligation, as necessary in the public interest, and for the purposes of legitimate interests pursued by SCI. If you are not satisfied with this, you have the right to object in certain circumstances (see the section headed "Your rights" below).

#### **Who we share Data with**

- 11. We may share your Data with the following groups of people for the following reasons:
  - a) any Member Office that is part of the Save the Children Association – in order to enable them to procure your services in the future;

- b) our employees, agents and/or professional advisors that are based in any of our Country Offices – in order to manage and facilitate the procurement and payment processes.
- c) third party service providers who provide services to us which require the processing of personal data - in order to facilitate the provision of services we have agreed to carry out for you;
- d) third party payment providers who process payments made - to enable third party payment providers to process payments to you;
- e) relevant authorities - to facilitate the detection of crime, the collection of taxes or duties and to comply with any other regulatory requirements; and
- f) third party auditors – for audit purposes.

in each case, in accordance with this privacy policy.

### **Keeping Data secure**

12. We will use technical and organisational measures to safeguard your Data, for example:

- a) access to your data by our employees can only be done if they are registered users of the ProSave module or any other system used to render payment and have been designated a user name and password;
- b) there is a governance system in place within SCI so that only employees who are processing data for the purposes as outlined within this policy;
- c) your Data will be stored on encrypted and secure servers;
- d) payment details are encrypted using SSL technology;
- e) any third party processor to which we may share your data will be contractually bound to keep your data secure and only process it for the purposes as outlined within this policy.

13. Technical and organisational measures include measures to deal with any suspected data breach. If you suspect any misuse or loss or unauthorised access to your Data, please let us know immediately by contacting us via this e-mail address: [dpo@savethechildren.org](mailto:dpo@savethechildren.org)

### **International transfers**

14. Many of our Country Offices, and some of the Member Offices of the Save the Children Association, are based outside the EEA so their processing of your personal data may involve a transfer of data outside the EEA. We will ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented;
- a) we will only transfer your personal data to a country that has been deemed adequate to provide an adequate level of protection for personal data by the European Commission; or

- b) a data sharing agreement that incorporates the models contract clauses for the protection of data that have been approved by the ICO exists between the exporter and importer of your data if either the exporter or importer are based outside the EEA.

### Data retention

- 15. Unless a longer retention period is required or permitted by law, we will only hold your Data on our systems for the period necessary to fulfil the purposes outlined in this privacy policy and at all times in line with our retention policy.
- 16. Even if we delete your Data, it may persist on backup or archival media for legal, tax or regulatory purposes.

### Your rights

- 17. You have the following rights in relation to your Data:
  - a) **Right to access** - the right to request (i) copies of the information we hold about you at any time, or (ii) that we modify, update or delete such information. If we provide you with access to the information we hold about you, we will not charge you for this, unless your request is "manifestly unfounded or excessive." Where we are legally permitted to do so, we may refuse your request. If we refuse your request, we will tell you the reasons why.
  - b) **Right to correct** - the right to have your Data rectified if it is inaccurate or incomplete.
  - c) **Right to erase** - the right to request that we delete or remove your Data from our systems.
  - d) **Right to restrict our use of your Data** - the right to "block" us from using your Data or limit the way in which we can use it.
  - e) **Right to data portability** - the right to request that we move, copy or transfer your Data.
  - f) **Right to object** - the right to object to our use of your Data including where we use it for our legitimate interests.
- 18. To make enquiries, exercise any of your rights set out above, or withdraw your consent to the processing of your Data (where consent is our legal basis for processing your Data), please contact us via this e-mail address: [dpo@savethechildren.org](mailto:dpo@savethechildren.org)
- 19. If you are not satisfied with the way a complaint you make in relation to your Data is handled by us, you may be able to refer your complaint to the relevant data protection authority. For the UK, this is the Information Commissioner's Office (ICO). The ICO's contact details can be found on their website at <https://ico.org.uk/>
- 20. It is important that the Data we hold about you is accurate and current. Please keep us informed if your Data changes during the period for which we hold it.

### Changes of ownership and control

- 21. SCI may, from time to time, expand or reduce its charitable services and this may involve the transfer of control of all or part of your data. Data provided by Users will, where it is relevant

to any part of our services, be transferred along with that part and the new owner or newly controlling party will, under the terms of this privacy policy, be permitted to use the Data for the purposes for which it was originally supplied to us.

22. In the above instances, we will take steps with the aim of ensuring your privacy is protected.

### **General**

23. You may not transfer any of your rights under this privacy policy to any other person. We may transfer our rights under this privacy policy where we reasonably believe your rights will not be affected.

24. If any court or competent authority finds that any provision of this privacy policy (or part of any provision) is invalid, illegal or unenforceable, that provision or part-provision will, to the extent required, be deemed to be deleted, and the validity and enforceability of the other provisions of this privacy policy will not be affected.

25. Unless otherwise agreed, no delay, act or omission by a party in exercising any right or remedy will be deemed a waiver of that, or any other, right or remedy.

26. This Agreement will be governed by and interpreted according to the law of England and Wales. All disputes arising under the Agreement will be subject to the exclusive jurisdiction of the English and Welsh courts.

### **Changes to this privacy policy**

27. SCI reserves the right to change this privacy policy as we may deem necessary from time to time or as may be required by law. Any changes will be immediately posted on the webpage used to access the ProSave module and you are deemed to have accepted the terms of the privacy policy on your first use of the ProSave module following the alterations.

You may contact the Data Protection Officer by email at [dpo@savethechildren.org](mailto:dpo@savethechildren.org).