

# ROOTS OF EMPATHY PRIVACY POLICY

## Introduction

Roots of Empathy is committed to ensuring the privacy of anyone who interacts with us. We are fully committed to respecting and protecting your information, using it reasonably and in line with the General Data Protection Regulation (GDPR and other applicable data protection laws and regulations). When you choose to provide us with personal information, it will only be used to support your relationship with Roots of Empathy and in line with this policy.

## Who we are

Roots of Empathy is an international organization that offers empathy-based programs for children. The International Office is a registered Canadian charity Charitable No. 89643 4818 RR0001.

References to 'we', 'us' and 'our' are to all of the Roots of Empathy offices, branches, subsidiaries and affiliates around the world. Roots of Empathy is made up of the following entities: Roots of Empathy USA, registered as a 501(c)(3) non-profit organization (EIN# 981017743). Roots of Empathy UK, registered charity number: 1170754. Roots of Empathy New Zealand, registered charity number: 2670851. Roots of Empathy Deutschland gemeinnützige GmbH, Amtsgericht - Registergericht - Hamburg: HRB 132821. Stichting Roots of Empathy Netherlands. Tax Number: RSIN 858423467.

The Canadian, UK, Germany and Switzerland offices are the data controllers to which this policy refers. Contact details can be found at the end of this policy. Please feel free to contact us with any questions related to this policy.

This policy was last updated on August 10, 2018 and is reviewed every 12 months. We may update this Privacy Notice from time to time.

## We collect personal information in the following ways:

- When you sign up to receive one of our online newsletters
- When you make a donation to us
- When you purchase or sign up for a book or product from us
- When you register to attend a Roots of Empathy event
- When you apply for a volunteering opportunity with us
- When you attend a Roots of Empathy training course
- When you request information from us

- When you take an e-learning online course from us
- When you complete our annual program evaluation feedback form
- When you consent to allowing Roots of Empathy to use photos or video of you or your child, artwork by your child or comments by you or your child
- We also gather general information about the use of our websites such as pages visited and areas that are of most interest to users

If you choose to provide it, we can collect the following types of personal information from you or your child:

- Name
- Birthdate
- Address
- Email address
- Phone number(s)
- Credit card details
- Information provided for the purpose of applying for a volunteering opportunity, including: skills, experience, employment history and criminal offence
- Photos, video, artwork, comments
- School or childcare centre name
- Grade

## How do we use information collected?

Data protection law requires us to have a legal justification to process your personal information. The type of data and type of processing determines the legal basis. Your personal data collected will be transferred to our own servers in Canada and will be processed and stored there. Please be informed that access to your information is granted on a need to know basis only and that our data protection standards are comparable to the standards under EU and Swiss privacy laws.

## Consent

We require your consent to:

- Update you on our organization and activities and provide information that we think may be of interest to you
- Show examples and give testimonials of the work we do through photographs, videos, artwork and comments from program participants.
- Ask you to donate
- Invite you to events
- Make you aware of new e-learning opportunities

### **Legitimate interest**

Our legitimate interests include the interests of our organization in conducting and managing our operations to enable us to give you the best service. Some specific examples of this include:

- To administer and process your applications for volunteering opportunities with us
- To providing you with information necessary for you to fulfill your role as a volunteer
- To contact you about training, mentoring and other activities related to your volunteering with us
- To respond to enquiries, requests for information or complaints from you
- To maintain databases of our volunteers and supporters to keep a record of your relationship with us

### **To fulfil a contractual obligation**

Where you have given us your information and have asked us to perform a service we will process your information to fulfill that service. Some specific examples of this include:

- To process donations that we receive from you
- To process orders for books or other merchandise purchases, deliver products and communicate with you about orders
- To process your payment for registration when you sign up for an event or e-learning opportunity and to provide logistics, updates and other information

### **Legal obligation**

We will process your personal information to fulfil any legal obligations placed upon us, such as the prevention of fraud or money-laundering. We will also process your personal information if lawfully required to do so by a legal authority or a court of law.

## **Opting out**

It's only with your support that we can nurture empathy in children. That's why we keep you posted with news about our work, how your support can make a difference and the variety of exciting ways you can support us in the future.

By subscribing to the Roots of Empathy's newsletter, making a donation, or opting in to email communication from Roots of Empathy you grant us the right to use the email address for email marketing.

However, of course we will not contact you again if you ask us not to. This can relate to all communications with you from Roots of Empathy or for specific channels of communication. You can contact us to change your contact preferences by emailing [mail@rootsofempathy.org](mailto:mail@rootsofempathy.org)

## Third party websites

On our website we sometimes have links to third party websites or applications. This policy does not apply to such pages or applications hosted or operated by other organizations. These other sites may have their own privacy policies which apply to them.

## Sharing of your personal information

Roots of Empathy will never sell your personal data. We may share your information with other Roots of Empathy offices, branches, subsidiaries and affiliates. This may involve your personal data moving outside the European Economic Area (EEA) or Switzerland to Canada which meets the European Commission's adequacy protection requirement in relation to its data protection laws. When this happens, we ensure that appropriate safeguards are in place to protect your personal information and to keep it secure.

We sometimes use trusted third parties to host or process your information on our behalf.

### **Hosting and processing arrangements**

Our websites are hosted by third party service providers and therefore any personal details you submit through them may be processed by that third party service provider.

We also use other third parties to process your personal details including in the following areas:

- to process online payments
- to process annual program evaluation results
- to process information associated with applications for volunteering opportunities

All third party services providers process your personal information only on Roots of Empathy's behalf.

### **Payment processing and fraud**

Where submitted, your card details may be disclosed to banks or relevant financial institutions to arrange payments. In the case of a suspected fraudulent transaction, your details may be further disclosed for the sole purpose of performing further checks (for example, disclosure to a credit checking agency).

### **Other sharing**

We may also share your personal information with your permission, or if we are legally required to disclose your information in circumstances where this cannot be reasonably resisted.

### **Security**

We take appropriate security measures to ensure that we keep your information secure,

accurate and up to date. We also take care to ensure that we have secure systems for processing payments through our payment services provider. However, the transmission of information over the Internet is never completely secure, so while we do our best to protect personal information, we cannot guarantee the security of information transmitted to our websites.

## Use of cookies

A cookie is a text-only piece of information that a website transfers to your computer to make the interaction between users and websites faster and easier. Without cookies, it would be very difficult for a website to allow a visitor to fill up a shopping cart or to remember the visitor's preferences or registration details for a future visit.

Our website uses cookies to save your login information and your screen display choices to make subsequent visits easier. We also use cookies on our Shopify platform to help you manage your shopping cart.

If you wish to restrict or block cookies you can set your internet browser to do so - click on the following link for more information: [www.aboutcookies.org](http://www.aboutcookies.org).

## Under the age of majority

We are committed to protecting the privacy of children that engage with us. If you are under the age of majority where you live and would like to get involved in Roots of Empathy's work, please make sure that you have your parent/guardian's permission before giving us personal information. If you are the parent of a child involved with Roots of Empathy, please make sure you have provided permission on their behalf before giving us personal information about them, or their photos, video, artwork or comments.

## Retention period for data

We only hold your personal information on our systems for as long as is necessary for the purposes outlined above. We remove personal data from our systems once it is no longer required, in line with our guidelines on how long important information must remain accessible for future use or reference, as well as when and how data can be destroyed when it is no longer needed.

The length of time each category of data will be retained will vary depending on how long we need to process it for, the reason it was collected and in line with any statutory requirements. After this time the data will either be deleted or we may retain a secure anonymized record for research and analytical purposes.

## Access to and your rights over your personal information

The personal data we hold about you is yours. You have the following rights over your information:

- To be informed how your data is being processed
- To access your data
- To rectify any data that is inaccurate
- To instruct us to delete your data
- To restrict our processing of your data (which includes contacting you via email) at any time. All our email communications to you will contain an unsubscribe link.
- To object to your data being stored.

If you wish to exercise any of these rights or have any questions about this policy you may contact us in the following ways:

### **International**

#### **By mail:**

Roots of Empathy  
250 Ferrand Drive, Suite 1501  
Toronto, ON M3C 3G8  
**By email:** [mail@rootsofempathy.org](mailto:mail@rootsofempathy.org)  
**By telephone:** 416-944-3001

### **UK**

#### **By mail:**

Roots of Empathy UK  
c/o The Young Foundation  
18 Victoria Park Square  
Bethnal Green, London E2 9PF  
**By email:** [kcohen@rootsofempathy.org](mailto:kcohen@rootsofempathy.org)

### **Germany**

#### **By mail:**

Roots of Empathy Deutschland GmbH  
Große Theaterstr. 42, 20354 Hamburg  
Deutschland  
**By email:** [cherman@rootsofempathy.org](mailto:cherman@rootsofempathy.org)

**Switzerland****By mail:**

Roots of Empathy  
c/o Marie Meierhofer Institut  
Pfingstweidstrasse 16  
8005 Zurich  
By email: [mstieger@rootsofempathy.org](mailto:mstieger@rootsofempathy.org)

**Complaints**

If you wish to make a complaint about our handling of your personal data please get in touch with us at the details above with the details of your complaint; we aim to respond to all complaints within 15 working days.

If you are dissatisfied with how we have handled your complaint you may make a complaint with the competent authority in:

**UK**

Information Commissioner's Office  
Website: <https://ico.org.uk/global/contact-us/>  
Telephone: 0303 123 1113

**Switzerland**

Federal Data Protection and Information Officer  
Website: <https://www.edoeb.admin.ch/edoeb/en/home/the-fdpic/contact.html>