PRIVACY POLICY

Effective: June 2018

Lewa Wildlife Conservancy (hereinafter referred to as Lewa) not only cares about wildlife conservation but also takes your privacy very seriously and cares about how your information is collected, used, stored, and shared. We are providing this Privacy Policy to explain our practices and the choices that you can make about the way your information is used by the Conservancy. The Privacy Policy describes our practices in connection with the information we collect through websites operated by us from which you are accessing this Privacy Policy (the “Websites”), through the software and web applications made available by us for use on or through computers and mobile devices (the “Apps”), through our social media pages that we control as well as through HTML-formatted email messages that we send to you that link to this Privacy Policy and through offline interactions that we may have with you (collectively, including the Websites, the Apps and our Social Media Pages, the “Services”). By providing Personal Information to the Conservancy, you agree to this Privacy Policy.

Who we are

We are Lewa Wildlife Conservancy ("Lewa") and we are data controller in respect of your personal data. This privacy policy applies also to Lewa UK, Lewa US and Lewa Canada with whom we share your personal data and who we allow to process your personal data in line with this policy. Our contact details are available at http://www.lewa.org/who-we-are/contact-lewa/

We aim at all times to comply with relevant data protection law. Primarily, this means the General Data Protection Regulation or "GDPR" (Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data).
Why we collect your personal data

To successfully conserve wildlife and improve the livelihoods of communities contiguous to Lewa we need to have effective communication and fundraising activities with our supporters like you. By understanding more about how you engage with the information we provide, we can improve how we communicate the most important messages that you need to hear. Collecting personal data like email addresses or home addresses allows us to directly communicate with you in a timely manner, keeping you the most up-to-date on how you can contribute to the conservation of wildlife in northern Kenya. Collecting data also allows us to see which communication works in the most efficient way so we can allocate more funds into conservation.

What personal data we collect

If you subscribe to Lewa's e-newsletter, request additional information about the Lewa Wildlife Conservancy, submit a donation online, or participate in any of the other services on the Lewa website that require personal information, we may request your name, mailing address, telephone number and email address in order to respond to your inquiries. Lewa may collect and store the personal data you choose to provide us to send you information about our work. If you make a donation to Lewa and elect to pay online, Lewa will collect the necessary financial information. Lewa collects and stores some information the user chooses to provide, including name, address and email address, to send users information about Lewa. Lewa will not disclose financial information except as necessary to fulfil users' donation requests. Lewa collects such financial information in a secure manner and discards such financial information after processing.

Lewa also uses “cookies” to help monitor traffic and collect information about the use of the Lewa site. Cookies are pieces of data placed on your device when you visit the Sites that help us recognize you when you come back to the Sites, allowing us, for instance, to remember the email address and password you use when you log in on a specific device. Lewa uses the aggregated information collected from cookies to measure the number of visits to the site, the average time spent on the site, the identity and number of pages viewed and to gather other traffic data and information that allows us to improve our website. We also use the information for security purposes, to facilitate navigation, to display information more effectively, and to personalize your experience while using the Sites. Cookies further allow us to select which of our content is most likely to appeal to you and display it while you are on the Sites. To see which cookies we use on our website, click here.

Links to Other Websites, Blogs/Forums and Social Media Widgets
We may link our website to other websites such as those of payment processors. Their privacy policy may differ from ours and we encourage you to read carefully through their privacy statement and understand.

**How we use your personal data**

We may process your personal data for the general purposes of advancing our mission of conserving wildlife and community development. Specifically, we may process your personal data in the following ways:

**Processing information internally**

- Updating our records to make sure we have the correct contact information, or if we require additional information about you;
- Processing donations, sales transactions, or other payments and verifying financial transactions;
- Responding and logging to any enquiries or issues;
- Fixing problems with the website to improve your user experience.

**Creating a relationship with you**

- We will use your information to tailor our communications with you;
- To help us use our resources more efficiently, we use profiling and analysis techniques to help us understand our supporters’ backgrounds to identify those who may be willing to support our work financially. Sometimes we use publicly available information to do this:
  - Asking you to financially support our work;
  - Keeping you up-to-date about our work;
  - Inviting you to participate in surveys, campaigns or market research to find out more about the demographics, interests and behaviors of our supporters.
  - Invite you to visit Lewa as a tourist or guest
  - Invite you to have a working partnership with Lewa Wildlife Conservancy

**Reviewing our organisational activities**

- Enhancing or reviewing our activities to improve our supporters’ experience with us;
- Conducting analysis using, where possible, anonymised information.

**The legal basis for processing your personal data**

In general, we process your personal data on the basis that it is necessary for the purposes of pursuing our legitimate interests. Where we send you electronic direct marketing, we do so on the basis that you have consented to receive it.

**Further use of donor personal data**
Any information supplied to Lewa by donors will be used solely for Lewa's legitimate interests and will not be shared outside Lewa, its affiliates and contractors for any reason unless permission is granted by the donor to share such information or unless there is an exceptional reason under which we are required by law to disclose it. All requests to remain anonymous shall be honoured. Lewa does not sell or share donor lists. Donors who supply our organization with their postal address or email address, phone number, and who have consented to receive direct marketing may be contacted periodically for solicitation purposes and/or with information regarding upcoming events or to inform donors of new programs and services and share our latest publications and Impact Reports. Donors may request to be permanently removed from Lewa’s mailing list by contacting us via the unsubscribe link at the bottom of all email, requesting us via email, phone or postal mail. All requests to be removed from our organization’s mailing list shall be honoured.

We may however share Personal Data with the following recipients:

- Affiliates within our corporate group that process Personal Data for marketing, fundraising, technical operations and account management purposes;
- Exceptionally, public and government authorities to the extent we are compelled to disclose Personal Data to comply with our legal obligations;

**Security**

We may store personal data in locations outside our direct control (for instance, on servers or cloud backups). We require any third parties providing such services to gives us sufficient guarantees regarding the technical and organizational measures they have implemented to ensure as far as possible the security of the data. However, no method of transmission over the internet, or method of electronic storage is 100% and we cannot guarantee absolute security. To facilitate our business practices, your personal data may be collected, transferred to and stored by us in Kenya and by our affiliates in other countries where we operate.

**Your Individual rights**

You have the right to request from us access to and rectification or erasure of personal data or to restriction of processing concerning you or to object to our processing of the data as well as the right to data portability. You have the right to complain to Lewa (www.lewa.org) if you feel there is a problem with the way we are handling your data.

You also have the right to lodge a complaint with the relevant supervisory authority for the purposes of the GDPR. For the UK, this is the Information Commissioner (www.ico.org.uk).

**Changes to the policy**
Our privacy policy may be reviewed and updated on a regular basis and checking the policy from time to time is recommended. We may notify you of any changes on this policy when necessary.

Questions

If you have any questions about this privacy policy, please email Lewa on info@lewa.org