# KOKOFOUNDATION

# **Privacy Policy**

KOKO Foundation ("KOKO Foundation", "we", "our", "us") is committed to keeping your personal information safe and meeting our responsibilities under privacy law. Given that this is information that can be used to identify you, we want you to be confident that we are using it responsibly.

This Privacy Notice gives you detailed information on why and when we collect your personal information when you use our website (including <a href="www.kokofoundation.com">www.kokofoundation.com</a>) and other services, how we use your personal information, how we keep it secure, and how you can let us know if you would like us to change how we manage it.

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#### 1. Who we are

KOKO Foundation is a charity launched in 2022, a company limited by guarantee registered in England and Wales (company number: 13394917) and a registered charity in England and Wales (charity number: 1199564) with its registered office address at 3rd Floor 7 Greenland Street, London, England, NW1 0ND.

If you have questions regarding your personal information or its use, please contact us using the details set out in the 'Contact us' section below.

# 2. What personal information we may hold about you

Personal information is any information that relates to an individual. It does not include information where the identity of the individual has been fully and effectively removed (anonymous data).

We collect the following personal information about you:

- Identification information, such as your name
- Contact information, such as your email address, telephone number and home address
- Financial information, such as payment card details and billing address.

If you contact us, for example to provide your feedback, we may keep a record of that feedback and correspondence, as well as your name and contact details.

When you access our websites, we also collect information about your computer, including, where available, your IP address, operating system, and browser type. We do this for system administration purposes, including to analyse trends and gather broad demographic information for aggregate use so that we can improve the site, and deliver customised, personalised content.

#### **Sensitive Personal Information**

Under data protection legislation, certain personal information is considered more 'sensitive' (e.g., information relating to race, religion, political affiliation and health). This is also known as 'special category data'. We do not typically collect special category data.

# 3. Where we obtain your personal information

We collect and retain personal information about you that you have given us in different ways, for example where you:

- Make a donation
- Use our website
- Subscribe to our mailing lists
- Engage with us via social media platforms
- Attend a workshop or event
- Contact us via email, phone, in person or by post.

# We may collect personal information about you from third parties, including:

- Where you have told a third party you are happy to share your data
- From publicly available and privately subscribed sources as part of our fundraising process. This may include obtaining information from individuals working on our behalf such as our Board and from organisations that represent business development opportunities for potential partners.

# 4. How we use your personal information

We may use your personal information for the following purposes:

- Contact you with important information relating to an event that you've booked
- Enable you to make use of our services
- Facilitate any transactions you wish to make with us, including donations
- Send you updates and information about KOKO Foundation and our events, or other services that we think might be of interest to you.
- Contact you regarding fundraising events
- Learn from your experience and feedback to develop our work
- Keep our database accurate, relevant and up to date.

We will not sell, distribute or disclose your information to third parties.

#### 5. Our lawful bases

We will only use personal information when the law allows us to (i.e., where we have a 'lawful basis'). Most commonly, we will use your personal information in the following circumstances:

- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests. For example, we have a legitimate interest in providing our services to you;
- Where it is necessary for the performance of a contract with you;
- Where it is necessary to comply with a legal obligation on us (for example, reporting to HM Revenue and Customs, Companies House or the Charity Commission).

In some circumstances, we may ask for your consent to use your personal information for a specific purpose. In particular, we may obtain your consent before we send you any email marketing, newsletters or other communications about topics and events which we think might interest you.

You may unsubscribe from our email communications by following the instructions in any email that we send you, or you can withdraw your consent and request us to remove your personal information at any time by emailing us at info@kokofoundation.com.

We do not carry out any automated decision-making using personal information which produces legal effects or otherwise significantly affects individuals.

# 6. Retaining your personal information

We will not keep personal information for longer than necessary, and the appropriate retention period will vary according to the intended purpose for which we collected the personal information.

The criteria we use to determine the retention period of personal information are: (i) the respective statutory retention period; (ii) our contractual and/or business relationships with you; (iii) (potential) disputes; and (iv) any guidelines issued by relevant regulators. After expiration of that period, the relevant information is routinely deleted, as long as it is no longer necessary for the fulfillment of a contract, the initiation of a contract or to protect or defend our position or that of a third party. If you have any questions about our retention periods, please contact us at info@kokofoundation.com.

#### 7. How we share your personal information

We may share your personal information with third parties, including the following:

- With contractors, suppliers, or other third parties that provide services on our behalf (such as website host providers)
- As part of a sale, merger or acquisition, or other transfer of all or part of our assets including as part of a bankruptcy proceeding

- Pursuant to a subpoena, court order, or other legal process or as otherwise required or requested by law, regulation, or government authority programs, or to protect our rights or the rights or safety of third parties
- With our professional advisors, lawyers, accountants and auditors
- With your consent or as otherwise disclosed at the time of data collection or sharing.

#### 8. International data transfers

We do not currently transfer personal information we hold to a country outside the UK. If we do so, we will take steps to ensure that your personal information is protected in accordance with appropriate safeguards, especially where the recipient country is not considered to be adequate under UK law. In particular, we will rely on the appropriate safeguards under data protection legislation, such as standard contractual clauses approved by the UK Government to protect your personal information.

#### 9. How we keep your personal information safe

To protect your privacy we will make sure your personal information is kept securely and disclosed only to relevant organisations or representatives who need to access it to perform their roles. While we seek to use appropriate organisational, technical and administrative measures to protect personal information within our organisation, unfortunately no data transmission or storage system can be guaranteed to be 100% secure. If you have reason to believe that your interaction with us is no longer secure, please immediately notify us in accordance with the "Contact us" section below.

## 10. Your rights

Under certain privacy laws, you have rights relating to your personal information. You may have a right to the following:

- To request access to the personal information we hold about you;
- To request that we rectify or erase your personal information;
- To request that we restrict the processing of your personal information;
- To object to our processing of your personal information in certain circumstances;
- Under certain circumstances, to ask us to port personal information about you that you have provided to us to you or to a third party; and
- Where we previously obtained your consent, to withdraw consent to processing your personal information.

To exercise these rights, contact us via the "Contact us" section below. Please be aware that we may be unable to provide these rights to you under certain circumstances, for example if we are legally prevented from doing so or can rely on exemptions.

Additionally, you have the right to lodge a complaint against us, which you can do by contacting the supervisory authority in your country of residence. In the UK, this is the Information Commissioner's Office at www.ico.org.uk/concerns.

#### 11. Other websites

Our websites contain links to other websites. Please note that when you click on one of these links, you are entering another website for which we have no responsibility (even if you access the website via a link to one of our websites). We encourage you to read the privacy notices on all such websites.

#### 12. Cookies

Our websites use cookies to enhance your experience while using those sites. Cookies are pieces of information that some websites transfer to the computer or device that is browsing that website and are used for record-keeping purposes at many websites. For further details about our use of cookies, please view our Cookie Notice.

## 13. Updates

This Notice may change from time to time – for example, to take into account changes at KOKO Foundation or to reflect changes in regulation or legislation. It was last updated on 31/09/2025.

Updates to this Notice will be posted on this page – please check back from time to time. We will also use reasonable efforts to inform you of any significant changes by email where appropriate.

#### 14. Contact us

If you have any questions or concerns about this Privacy Notice or the way in which we handle your personal information, please email info@kokofoundation.com.

You can also contact us at the following address: 3rd Floor, 7 Greenland Street, London, England, NW1 0ND.

# **Change Record**

| Date of Change: | Changed By: | Comments:                       |
|-----------------|-------------|---------------------------------|
| September 2025  | R.Kennedy   | Policy approved by the Trustees |
|                 |             |                                 |
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