



## **Cambodian Children's Fund Privacy Policy Statement**

### **CAMBODIAN CHILDREN'S FUND & YOU: SAFEGUARDING YOUR PRIVACY**

As with many organizations, modern information and communication technologies play a fundamental role in the activities of Cambodian Children's Fund (CCF). We are based in Phnom Penh, Cambodia, and have subsidiary offices in Los Angeles, Sydney, London and Hong Kong. We use our websites to tell you about what we do and to give those interested a chance to contribute to or to become involved with CCF and its work. Your use of this website constitutes acceptance of the provisions of this Privacy Policy.

This privacy policy discloses CCF's information gathering and dissemination practices for its websites located at the following URLs: [www.cambodianchildrensfund.org](http://www.cambodianchildrensfund.org) , [www.ccf-australia.org](http://www.ccf-australia.org) , [www.ccf-uk.org](http://www.ccf-uk.org) and [www.ccf-hk.org](http://www.ccf-hk.org) as well as offline information gathering methods of all kinds including to those associated with telephone and postal communications

### **PERSONAL INFORMATION**

You don't have to tell us anything about yourself when you visit our websites. You can access our home pages and browse our sites without disclosing any personal data. We do not automatically log personal data nor do we link information automatically logged by other means with personal data about specific individuals.

CCF, CCF-Australia, CCF-UK and CCF HK accept online donations for the purposes of serving children and families of Cambodia. When you make a donation online or via mail, we collect donor information (e.g., name, address, gift amount, phone number, email address, date of transaction) that allows us to process and record your gift. We utilize secure technology to request credit card approval and to keep your personal information secure when making a donation online.

Many websites use cookies to facilitate viewing. CCF does not use cookies to store information about specific individuals. You have the ability to accept or decline cookies by changing settings on your computer. You can see and use our sites even if you disable the cookie function on your browser. However, if you disable cookies, some advanced and customized features of our site may not be available to you.

We do analyze our website logs and user statistics to improve the value of our site. Our logs and user statistics are not personally identifiable and we make no attempt to link these logs and statistics with individuals who view our sites. These logs are reviewed for aggregate trends, not for the behaviors of individual users. Only authorized staff has access to our website logs and user statistics.

### **OUR WEB SITE'S SERVICES AND LINKS**

The only information on our website is CCF information. It is for contact between visitors and CCF - it does not enable our visitors to communicate with other visitors or to post information for others to access. Our site includes links to other sites. If you choose to visit another site, we

cannot assume responsibility for its content or information handling practices. We encourage you to review each site's privacy policy.

## **DATA COLLECTION & PURPOSE SPECIFICATION**

We do not look for or collect information about our visitors from other sources such as public records or private organizations. We do not compile, buy, sell, rent, share or trade consumer mailing lists. The only personal data we collect is that which you freely give us when you use some of the functions on CCF websites, particularly as relates to a donation or sponsorship. CCF does not knowingly collect personal data from anyone under the age of 18. We will never share, sell, trade or provide your personal information to non-CCF organizations unless required to do so by law.

When we ask you for personal information we will give you a secure transmission method to send us:

- Your primary personal data, such as your name and contact details
- Other personal and profiling data, such as your family details, how you heard about us, your personal comments, etc.
- Personal identifiers, such as your credit card details

CCF has implemented its own security policies, rules and technical measures to protect the personal data that we have under our control from:

- Unauthorized access
- Improper use or disclosure
- Unauthorized modification
- Unlawful destruction or accidental loss

Any CCF employees or data processors that have access to and/or are associated with the processing of personal data are contractually obliged to respect the confidentiality of our visitors' personal data.

We also ensure that your personal data will not be disclosed to national or local authorities, agencies or institutions except where required by law or other legally enforceable regulation.

If, for any reason, our privacy policy changes, we will post and explain our intention on our website and give you a clear opportunity to opt out of this new policy. We may also contact you directly by email to inform you of our intention and seek your agreement directly. If you don't agree to this new use, we will not use your information.

You can ask us if we hold any personal information about you, what it is and how we use it by:

- Sending an email to: [datasecurity@cambodianchildrensfund.org](mailto:datasecurity@cambodianchildrensfund.org)
- Calling this telephone number: (310) 828-1115 (US)
- Writing to Data Request at this address: Cambodian Children's Fund 2461 Santa Monica Blvd. PMB 833 Santa Monica, CA 90404 United States of America.

Once we receive your request we will make every effort to respond promptly, usually within a week or less. If we hold any relevant information about you, we will provide you with a copy of that information. We will not charge you for providing you with the information. We will request proof of identity before releasing any information.

## **FINANCIAL DATA**

CCF does not retain any financial data about donors or sponsors other than that required to verify that a relationship and/or transactions exists or has existed, as this information is required for transparency purposes and to demonstrate financial integrity.

CCF does not retain any credit card information or similar data. All electronic payment transactions operated through the CCF website are handled by a secure and authorized third party which is contractually responsible for processing all credit card information and complying with applicable legislation.

## **CCF STUDENT DATA & PRIVACY**

CCF collects and holds data about the children enrolled in our centres and/or to whom we provide services. We take specific steps to protect the privacy of children who share their personal data with us. We ensure that parents or legal guardians provide permission in a written format and are fully aware of the purposes for which we collect and maintain this information. Medical information may only be viewed or updated by authorized healthcare staff.

## **PRIVACY COMPLIANCE**

Our privacy policy complies with the following legislation, all as amended where relevant:

- Online Privacy Protection Act 2003: California, US
- Privacy Act 1988: Australia
- Data Protection Act 1998: United Kingdom
- Personal Data (Privacy) Ordinance (Cap. 486), 1999: Hong Kong
- Relevant elements of the European Data Protection Directive (Directive 95/46/EC).

CCF's handling of personal data is subject to supervision from various jurisdictions, including the California Office of Information Security & Privacy Protection (COISPP) in the US, the Data Protection Commissioner in the United Kingdom, the Office of the Privacy Commissioner in Australia and the Hong Kong Office of the Privacy Commissioner for Personal Data.

## **SELF-ASSESSMENT PROCEDURE**

Additional to observance of the stipulations in the relevant national legislation, CCF voluntarily commits itself to its own Self-Assessment procedures. These procedures are administered by a designated officer within CCF's IT department acting with the direct and delegated authority of the Executive Director.

## **PRIVACY SUPPORT**

The tables below summarize our purposes for collection and usage of personal data:

Technical administration of the web sites and databases - We work hard to make sure that our websites and databases operate well. We may pass personal information to staff and third party vendors responsible for these maintenance functions.

Research & Development - We may sometimes use or analyze data to help us better develop our website for those who support us.

Customer Administration - We want to ensure that contacts with visitors and supporters are accurately maintained.

Marketing - We may use data we hold to improve our approach to sharing news and information as well as for fundraising.

It is important to CCF that anyone who uses its website or who provides the organization with personal information is assured that it is kept safely and used properly. If you have an enquiry or concern about our privacy policy, please contact: [datasecurity@cambodianchildrensfund.org](mailto:datasecurity@cambodianchildrensfund.org)

If you are for any reason dissatisfied with our response to your enquiry, you may contact the relevant national agency:

- United States - California Office of Privacy Protection Email: [privacy@oispp.ca.gov](mailto:privacy@oispp.ca.gov)
- Australia - Office of the Privacy Commissioner Email: [privacy@privacy.gov.au](mailto:privacy@privacy.gov.au)
- United Kingdom - Data Protection Commissioner Email: <http://www.ico.gov.uk/complaints.aspx>
- Hong Kong – Office of the Privacy Commissioner for personal Data Email: [enquiry@pcpd.org.hk](mailto:enquiry@pcpd.org.hk)

## **SENSITIVE DATA**

We neither seek nor hold personal information that might be volunteered by sponsors or donors in any of the following categories:

- Racial or ethnic origin
- Political opinions or affiliations
- Religious or philosophical beliefs
- Trade union membership
- Health/Medical data
- Sex life or social practices
- Police/Justice data

## **CONTACT INFORMATION**

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CCF Hong Kong  
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Website: [www.cambodianchildrensfund.org/uk](http://www.cambodianchildrensfund.org/uk)