



# BARN OCH KVINNOR ORGANISATION

Children & Women Organisation

Faith • Action • Results

## PRIVACY NOTICE

*How We Collect, Use, Share and Protect Your Personal Data*

### Website & Public Edition

|                           |                                                                                                                                    |
|---------------------------|------------------------------------------------------------------------------------------------------------------------------------|
| Policy Owner              | Board of Directors                                                                                                                 |
| Data Controller           | Barn Och Kvinnor Organisation                                                                                                      |
| Version                   | 2.0 — Updated 2026 (supersedes Version 1.0, issued 2022)                                                                           |
| Effective Date            | 2026                                                                                                                               |
| Scheduled Review          | 2028, or sooner if legally required                                                                                                |
| Sweden Registration No.   | 802511-3658                                                                                                                        |
| Uganda Registration No.   | 80020003906032                                                                                                                     |
| District Registration No. | WCBO/26/454 (Community Based Nonprofit Organisation, Wakiso District)                                                              |
| Applicable Law            | Regulation (EU) 2016/679 (GDPR), the Swedish Data Protection Act (2018:218), and applicable Ugandan and Kenyan data protection law |
| Classification            | Public Document — published on barnochkvinnor.org                                                                                  |



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## Version History and Summary of Changes

| Version                           | Description                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
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| Version 1.0 — 2022                | Initial Privacy Notice, addressing core data categories, donation processing and basic data subject rights.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
| Version 2.0 — 2026 (this version) | Fully revised to align with the General Data Protection Regulation (EU) 2016/679, the Swedish Data Protection Act (2018:218), and current guidance from the European Data Protection Board. Key changes include: correction of the supervisory authority reference to the Swedish Authority for Privacy Protection (IMY); clearer legal bases and retention criteria; a dedicated international transfers section with named safeguards; alignment of children's data provisions with GDPR Article 8 and our Safeguarding and Disability Inclusion & Accessibility Policies; replacement of "Firm Consent" with the recognised standard of verifiable parental consent; and the addition of a cookies and website tracking notice. |

## 1. Who We Are

Barn Och Kvinnor Organisation ("BOK", "we", "us" or "our") is a registered charity organisation constituted in Sweden under registration number 802511-3658, a registered company limited by guarantee in Uganda under registration number 80020003906032, and a registered community based nonprofit organisation in Wakiso District, Uganda, under registration number WCBO/26/454.

We are committed to respecting your privacy and protecting your personal data. This Privacy Notice explains who we are, how we collect, share and use your personal data, and how you can exercise your data protection rights. It applies to visitors to our website, donors, supporters, members, programme partners and other individuals who interact with us.

## 2. The Data Controller

Barn Och Kvinnor Organisation is the data controller responsible for your personal data for the purposes of the General Data Protection Regulation (EU) 2016/679 ("GDPR") and the Swedish Data Protection Act (2018:218). Our contact details are set out in Section 16 of this Notice.

BOK has not appointed a statutory Data Protection Officer, as this is not currently required given the nature and scale of our processing activities. We have designated a Data Protection Contact point, set out in Section 16, who is responsible for data protection queries and requests.

## 3. Personal Data We Collect From You

We collect personal data in order to maintain a relationship with you and keep you updated on our work. Depending on the services you use, this may include data collected to:

- Process an application for membership.
- Deal with your enquiries, requests and complaints.

- Process your donations, including Gift Aid or equivalent tax-relief donations, and confirm receipt of donations, unless you have asked us not to.
- Provide you with the services, products or information you have requested.
- Provide you with information about our work, activities, events and services.
- Comply with our legal obligations, policies and procedures.
- Provide and personalise our services.
- Administer membership and supporter records.
- Carry out fundraising activities.

### 3.1 Categories of Data We Collect

- Identity data — including your full name and title.
- Contact data — including your email address and telephone number.
- Identification documents — such as a driving licence or other identity document, where required for a specific purpose (for example, safeguarding checks or large donation verification).
- Technical data — including online tracking data and service usage data.

It is important that the personal data we hold about you is accurate and up to date. Please tell us if your personal data changes during your relationship with us.

## 4. Personal Data We Collect From Other Sources

We sometimes work with carefully selected third parties who collect personal data on our behalf, as well as for their own purposes. These third parties currently include, but are not limited to:

- Business partners.
- Other registered charities.
- Religious institutions and faith community partners.

Where we receive personal data from a third party, we take reasonable steps to confirm that the third party had a lawful basis to collect and share that data with us.

## 5. Legal Bases for Processing Your Data

Under Article 6 GDPR, we may only process your personal data where we have a valid legal basis. We rely on one or more of the following:

- **Consent:** you have given clear, informed consent for us to process your personal data for a specific purpose.
- **Contract:** the processing is necessary for a contract we have with you, or because you have asked us to take specific steps before entering into a contract.
- **Legal obligation:** the processing is necessary for us to comply with the law, including safeguarding, financial reporting and anti-money-laundering obligations.
- **Legitimate interests:** the processing is necessary for our legitimate interests, or those of a third party, and your interests and fundamental rights do not override those interests. We rely on this basis in a limited way, for example for basic administration and fraud prevention, and we carry out a balancing assessment before doing so.
- **Public interest:** in limited circumstances, for example defending legal claims, where processing is necessary for reasons of substantial public interest.

## 6. How We Use Your Personal Data

| Purpose                                                                                                     | Data Used and Legal Basis                                                                                                                                                                                                  |
|-------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Marketing activities, including fundraising communications                                                  | Technical, identity and contact data, processed on the basis of your consent or, in limited circumstances, our legitimate interest in fundraising for our charitable purpose, subject to your right to object at any time. |
| Legal claims and obligations, including defence of legal claims                                             | Identity, contact and identification data, processed on the basis of legitimate interest and, where applicable, public interest.                                                                                           |
| Managing complaints and enquiries, improving our website, administering social media and membership records | Technical, identity and contact data, processed on the basis of your consent and our legitimate interest in operating our services effectively.                                                                            |
| Processing donations, including Gift Aid, fundraising and confirming receipt of donations                   | Identity and contact data, processed on the basis of your consent and, where applicable, the performance of a contractual or legal obligation.                                                                             |
| Delivering services, products and information, including updates on activities and events                   | Identity and contact data, processed on the basis of your consent.                                                                                                                                                         |

## 7. Special Category Data

We do not collect special category data (for example, data concerning health, disability, religious belief or racial or ethnic origin) from our general supporters, unless there is a clear and specific reason for doing so — for example, participation in a fundraising event where we need this information to provide appropriate facilities or support to enable your participation.

In such cases, we will provide a clear notice on the relevant application or registration form explaining what data we need, why we need it, and the specific legal basis relied upon under Article 9 GDPR, which will ordinarily be your explicit consent.

Special category data is retained only for as long as necessary for the purpose for which it was collected, and is deleted or securely anonymised once no longer required.

## 8. Personal Data Relating to Children (Child Protection and Consent)

### 8.1 Commitment to Child Protection

Our commitment to child protection is our highest priority. We adhere strictly to national and international child safeguarding guidelines, ensuring a secure and supportive environment for all children participating in our programmes, services and online platforms. This Privacy Notice should be read alongside our Safeguarding Policy and our Disability Inclusion & Accessibility Policy, both available on our website or on request.

### 8.2 Legal Basis and Verifiable Parental Consent

In compliance with Article 8 GDPR and, where relevant, comparable protections such as the US Children's Online Privacy Protection Act (COPPA), we require verifiable consent from a parent or legal guardian before collecting, using or disclosing any personal data from a child below the applicable age of digital consent.

The applicable age depends on where the child is located: Sweden has set the age of consent for information society services at 13 under national implementing legislation. Where our online services are accessed from a jurisdiction that has set a different age, we apply that jurisdiction's threshold; where no clear local threshold applies, we apply the GDPR default age of 16 as a precaution.

- Minimal data: we collect only the data necessary for a child's participation, for example a first name, age and a primary contact email for a parent or guardian.
- No third-party marketing: we never sell or rent a child's personal data to third parties for marketing purposes.

### 8.3 Parent and Guardian Rights

Parents and guardians may exercise the following rights in respect of their child's personal data, in addition to the general data subject rights set out in Section 14:

- Review and access the personal data we hold about their child.
- Request deletion of their child's personal data at any time.
- Revoke consent for any future collection or use of their child's personal data.

### 8.4 Media and Image Consent

Where we wish to use photographs, video or audio recordings of children for promotional, fundraising or archival purposes, we require explicit, separate consent from a parent or guardian, obtained through our consent form for media use, in accordance with our Safeguarding Policy.

- Names are never published alongside identifying images without specific, additional consent.
- Media use is generally limited to our official website, social media channels and printed materials, such as newsletters or annual reports.

## 9. Sharing Your Personal Data

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We may share your personal data with third parties where we are required to do so by law, or where sharing is necessary for the purposes described in this Notice, for example with payment processors, IT service providers or professional advisers acting under our instructions.

- Special category data is not shared with third parties, except where a specific legal basis and appropriate safeguards apply, as described in Section 7.
- All data is stored securely, with access limited to authorised staff who need it to perform their role.
- Where a third party processes personal data on our behalf, we put in place a data processing agreement consistent with Article 28 GDPR.

## 10. International Transfers of Your Personal Data

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As an organisation operating in Sweden, Uganda and, through partnership, Kenya, your personal data may be transferred outside Sweden and the European Economic Area (EEA). We only transfer personal data internationally where:

- we are required or permitted to do so by law or regulatory requirement; or
- we are sharing data with a partner or service provider to support the purposes described in this Notice.

Where we transfer personal data outside the EEA to a country that has not been recognised by the European Commission as providing an adequate level of protection, we put in place appropriate safeguards, such as the

European Commission's Standard Contractual Clauses, together with any supplementary measures needed to ensure your data continues to benefit from a level of protection essentially equivalent to that guaranteed within the EEA. We require all third parties to keep your personal data confidential and secure.

## 11. Retaining Your Personal Data

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We retain personal data for as long as necessary for the purposes described in this Notice, and to meet our legal or regulatory obligations, or for the exercise or defence of legal claims. As a general guide:

- Donation and Gift Aid records are retained for the period required by applicable tax and charity law.
- Membership and supporter contact records are retained for the duration of the relationship, plus a limited period thereafter to allow us to respond to any follow-up queries.
- Special category data is deleted, or irreversibly anonymised, as soon as it is no longer required for the purpose for which it was collected.

Where we can no longer identify you, we may retain and use anonymised or aggregated information without further notice to you.

## 12. Data Security

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We have implemented appropriate technical and organisational measures to protect your personal data against unauthorised access, alteration, disclosure or destruction, including access controls, secure storage and staff training. We regularly review our security measures in light of the state of the art, the costs of implementation, and the nature and risk of the processing concerned.

## 13. Profiling and Automated Decision-Making

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We do not engage in any profiling activities using your personal data, and we do not use automated processes to make decisions about you that produce legal or similarly significant effects.

## 14. Your Data Subject Rights

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You have the following rights relating to the personal data we hold about you, subject to applicable exceptions and limitations under GDPR. To exercise any of these rights, please contact us using the details in Section 16.

- **Right to be informed:** we are obliged to provide clear and transparent information about how we process your personal data, as set out in this Notice.
- **Right of access:** you have the right to obtain confirmation that we are processing your personal data, and to receive a copy of that data, commonly known as a data subject access request.
- **Right to rectification:** if you believe we hold inaccurate or incomplete personal data about you, you may ask us to correct or complete it.
- **Right to erasure:** you may ask us to delete or remove personal data where there is no good reason for us to continue processing it. We may not always be able to comply with a request for erasure for specific legal reasons, which will be explained to you if applicable.
- **Right to restrict processing:** you may ask us to suspend the processing of your personal data, for example if you contest its accuracy or object to our processing pending verification of an overriding ground.
- **Right to data portability:** you may ask us to transfer your personal data to another controller, in a structured, commonly used and machine-readable format, where processing is based on consent or contract and is carried out by automated means.

- **Right to withdraw consent:** where we rely on your consent to process your personal data, you may withdraw that consent at any time. This will not affect the lawfulness of processing carried out before your withdrawal.
- **Right to object:** you may object to our processing of your personal data where we rely on legitimate interests, and you may object at any time to processing carried out for direct marketing purposes.

## 15. Cookies and Website Tracking

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Our website may use cookies and similar technologies to operate effectively and to understand how visitors use our website. Where required by applicable law, we obtain your consent before setting non-essential cookies. Further details of the specific cookies we use, their purpose and duration, and how to manage your preferences are set out in our separate Cookie Notice, available on our website.

## 16. Making a Data Protection Complaint

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If you have any concerns about the use of your personal data, or the way we have handled a request relating to your rights, you can raise a complaint directly with us using the contact details below.

If you are not satisfied with the way we handle your complaint, you have the right to lodge a complaint directly with the Swedish supervisory authority:

- **Integritetsskyddsmyndigheten (IMY) — the Swedish Authority for Privacy Protection:** Box 8114, 104 20 Stockholm, Sweden. Website: [imy.se](https://imy.se). If you are located in another EU or EEA member state, you may instead lodge a complaint with your local data protection authority; a full list of national data protection authorities is available via the European Data Protection Board at [edpb.europa.eu](https://edpb.europa.eu).

### Data Protection Contact

Barn Och Kvinnor Organisation

E-mail: [info@barnochkvinnor.org](mailto:info@barnochkvinnor.org)

## 17. Changes to This Notice

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We may update this Privacy Notice from time to time to reflect changes in our practices, our services, or applicable law. Where changes are significant, we will take reasonable steps to notify you, for example by publishing a notice on our website. The version history at the front of this document records the date and nature of substantive changes.

*This Privacy Notice was last updated in 2026 and supersedes all previous versions, including the Version 1.0 Privacy Notice issued in 2022. It is published as a binding statement of Barn Och Kvinnor Organisation's data protection practices and is available at all times on [barnochkvinnor.org](https://barnochkvinnor.org).*

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