

# Privacy Policy

**Effective date: January 2021**

HDSK (“us”, “we”, or “our”) operates the <https://www.hdsk.org.uk> website and carries out other activities in pursuit of our charitable objectives, which may include (without limitation) the processing of your Personal data and communicating with you (the “Service”). We are strongly committed to protecting your personal data and have taken steps to protect the information you share with us. HDSK collects certain personal information to provide you with customised services and content.

This page informs you of our policies regarding the collection, use, and disclosure of personal data when you use our Service and the choices you have associated with that data.

We use your data to provide and improve the Service. By using the Service, you agree to the collection and use of information in accordance with this policy.

## Definitions

### **Personal Data**

Personal Data means data about a living individual who can be identified from those data (or from those and other information either in our possession or likely to come into our possession).

### **Usage Data**

Usage Data is data collected automatically either generated by the use of the Service or from the Service infrastructure itself (for example, the duration of a page visit).

### **Cookies**

Cookies are small pieces of data stored on a User’s device.

### **Data Controller**

Data Controller means a person who (either alone or jointly or in common with other persons) determines the purposes for which and the manner in which any personal data are, or are to be, processed.

For the purpose of this Privacy Policy, we are a Data Controller of your data.

### **Data Processor (or Third-Party Service Provider)**

Data Processor (or Third-Party Service Provider) means any person (other than an employee of the Data Controller) who processes the data on behalf of the Data Controller.

We may use the services of various Third-Party Service Providers to process your data more effectively.

### **Data Subject**

Data Subject is any living individual who is the subject of Personal Data.

### **User**

The User is the individual using our Service or receiving the benefit of the Service e.g. through our communications with you. The User corresponds to the Data Subject, who is the subject of Personal Data.

# Information Collection and Use

We collect several different types of information for various purposes to provide and improve our Service to you.

## Types of Data Collected

### **Personal Data**

For the purpose of providing our Service, we may ask you to provide us with certain personally identifiable information that can be used to contact or identify you (“Personal Data”). Personally identifiable information may include, but is not limited to:

- Email address
- First name and last name
- Address including postcode
- Telephone number
- Bank account details for regular standing order donations
- Credit card details for processing credit card payments
- Taxpayer status for claiming Gift Aid
- Usage Data

We may use your Personal Data to contact you with newsletters and other information that may be of interest to you, including from other organisations concerning their activities or the activities of Prem Rawat, relevant to his sharing of his message. You may opt out of receiving any, or all, of these communications from us by following the unsubscribe link or instructions provided in any email we send or by writing to HDSK at 148 Portland Road, Hove, BN3 5QL or emailing [info@hdsk.org.uk](mailto:info@hdsk.org.uk).

### **Your credit or debit card information**

If you use your credit or debit card to donate to us, or for any other purpose online, we pass your card details securely to our payment processing partner as part of the payment process. We do this in accordance with the Payment Card Industry Security Standard ([PDF download](#)), and don't store the details on our website or databases.

### **Usage Data**

We may also collect information how the Service is accessed and used ("Usage Data"). This Usage Data may include information such as your computer's Internet Protocol address (e.g. IP address), browser type, browser version, the pages of our Service that you visit, the time and date of your visit, the time spent on those pages, unique device identifiers and other diagnostic data.

### **Tracking Cookies Data**

Cookies are files with small amount of data, which may include an anonymous unique identifier. Cookies are sent to your browser from a website and stored on your device.

**HDSK's website does not currently use Cookies**

## **Why are we allowed to process your personal information?**

Our Privacy Policies take into account several laws, including:

- the Data Protection Act 2018
- the Privacy and Electronic Communications (EC Directive) Regulations 2003
- General Data Protection Regulation (EU) 2016/679

Generally, our processing of your personal information as described in this policy is allowed by these laws based on one or more lawful grounds, including:

- Where you have provided your consent to us using your personal information in a certain way. For example, for including you on our mailing list. We also may ask for your explicit consent if you share sensitive personal information with us.

- Where the processing is reasonably necessary for the performance of a contract to which you are a party or to take steps at your request prior to entering a contract. For example, we may rely on this basis where you apply to work for us.
- Where the processing is reasonably necessary to comply with a legal obligation to which we are subject. For example, we may rely on this basis where we are obliged to share your personal information with a regulator or HMRC.
- Where the processing is reasonably necessary for the purpose of a legitimate interest pursued by us or a third party and your privacy rights do not override the legitimate interest. Our “legitimate interests” include pursuing the aims and ideals of HDSK by advancing public education in the understanding and realisation of human potential through self-knowledge based upon the teachings of Prem Rawat through our work in the UK and globally, and fundraising through direct marketing campaigns. However, "legitimate interests" can also include your interests, such as when you have requested information from us, and from those of third parties such as those organisations we work with that share similar aims and objectives to those of HDSK, and when we have reasonable grounds for believing that such information may be of interest to you, being similar in nature to the information which we already provide to you, in relation to Prem Rawat and his message. For example, we rely on legitimate interests for activities such as sending information updates and other communications by post or telephone unless you have told us that you would prefer not to hear from us in this way.

In any event, where we are relying on legitimate interests to process your personal information, we will consider any potential impact on you (positive or negative), your rights under data protection laws, and will not use your personal information for activities where the impact on you overrides the legitimate interests in the processing.

Where we process sensitive personal data (as mentioned above), we will make sure that we only do so in accordance with one of the additional lawful grounds for processing that type of data, such as where we have your explicit consent or you have made that information manifestly public.

## Use of Data

HDSK uses the data for various purposes:

- To provide and maintain our Service

- To notify you about changes to our Service
- To allow you to participate in any interactive features of our Service when you choose to do so
- To provide customer support
- To gather analysis or valuable information so that we can improve our Service
- To monitor the usage of our Service
- To detect, prevent and address technical issues
- To keep you informed of events at which Prem Rawat will be speaking and of other information which we think may be of interest to you in learning more about Prem Rawat's message.

## Retention of Data

HDSK will retain your Personal Data only for as long as is necessary for the purposes set out in this Privacy Policy. We will retain and use your Personal Data to the extent necessary to comply with our legal obligations (for example, if we are required to retain your data to comply with applicable laws), resolve disputes, and enforce our legal agreements and policies.

HDSK will also retain Usage Data for internal analysis purposes. Usage Data is generally retained for a shorter period of time, except when this data is used to strengthen the security or to improve the functionality of our Service, or we are legally obligated to retain this data for longer time periods.

## Transfer of Data

Your information, including Personal Data, may be transferred to — and maintained on — computers located outside of the UK where the data protection laws may differ than those from your jurisdiction.

Your consent to this Privacy Policy followed by your submission of such information represents your agreement to that transfer.

HDSK will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this Privacy Policy and no transfer of your Personal Data will take place to an organization or a country unless there are adequate controls in place including the security of your data and other personal information.

## Disclosure of Data

### **Disclosure for Law Enforcement**

Under certain circumstances, HDSK may be required to disclose your Personal Data if required to do so by law or in response to valid requests by public authorities (e.g. a court or a government agency).

## **Legal Requirements**

HDSK may disclose your Personal Data in the good faith belief that such action is necessary to:

- To comply with a legal obligation
- To protect and defend the rights or property of HDSK
- To prevent or investigate possible wrongdoing in connection with the Service
- To protect the personal safety of users of the Service or the public
- To protect against legal liability

## **Security of Data**

The security of your data is important to us, but remember that no method of transmission over the Internet, or method of electronic storage is 100% secure. While we strive to use commercially acceptable means to protect your Personal Data, we cannot guarantee its absolute security.

**“Do Not Track” Signals** We do not support Do Not Track (“DNT”). Do Not Track is a preference you can set in your web browser to inform websites that you do not want to be tracked.

You can enable or disable Do Not Track by visiting the Preferences or Settings page of your web browser.

## **Your Rights**

HDSK aims to take reasonable steps to allow you to correct, amend, delete, or limit the use of your Personal Data.

If you wish to be informed what Personal Data we hold about you and if you want it to be removed from our systems or amended, please contact us at [info@hdsk.org.uk](mailto:info@hdsk.org.uk)

In certain circumstances, you have the right:

- To access and receive a copy of the Personal Data we hold about you
- To rectify any Personal Data held about you that is inaccurate
- To request the deletion of Personal Data held about you
- To limit the use of your Personal Data

You have the right to data portability for the information you provide to HDSK. You can request to obtain a copy of your Personal Data in a commonly used electronic format so that you can manage and move it. Please note that we may ask you to verify your identity before responding to such requests.

The UK’s independent authority set up to uphold information rights in the public interest is the ICO (The Information Commissioner’s Office) and can be contacted online at <https://ico.org.uk/> or by post or telephone as follows:

Information Commissioner's Office

Wycliffe House

Water Lane

Wilmslow

Cheshire

SK9 5AFTel: 0303 123 1113 (local rate) or 01625 545 745 if you prefer to use a national rate number

# Third-Party Service Providers

We employ certain third-party companies and individuals to facilitate our Service (“Third-Party Service Providers”) to provide the Service on our behalf, to perform Service-related services or to assist us in analysing how our Service is used.

These third parties have access to your Personal Data only to perform these tasks on our behalf and may not disclose or use it for any other purpose. You can have any of your Personal Data removed from these Third-Party Service Providers by sending an email to [info@hdsk.org.uk](mailto:info@hdsk.org.uk)

We use the following Third-Party Service Providers to monitor and analyse the use of our Service.

## **EMMA EMAIL MARKETING**

Emma email marketing is a marketing automation platform that helps us share email campaigns with interested parties. Emma uses web beacons, which are single-pixel gifs, in our emails. When we send emails to those on our mailing list, we may track behaviour such as who opened the emails and who clicked the links. This allows us to measure the performance of our email campaigns and to improve our features for specific segments of Users.

## Links to Other Sites

Our Service may contain links to other sites that are not operated by us. If you click on a third-party link, you will be directed to that third party’s site. We strongly advise you to review the Privacy Policy of every site you visit. We have no control over and assume no responsibility for the content, privacy policies or practices of any third-party sites or services.

### **Children’s Privacy**

Our Service is not directed to anyone under the age of 13 (“Children”). We do not knowingly collect personally identifiable information from anyone under the age of 13. If you are a parent or guardian and you are aware that your child has provided us with Personal Data, please contact us. If we become aware that we have collected Personal Data from children without verification of parental consent, we take steps to remove that information from our servers.

# Changes to This Privacy Policy

We may update our Privacy Policy from time to time. We will notify you of any changes by posting the new Privacy Policy on this page.

We will let you know via email and/or a prominent notice on our Service, prior to the change becoming effective and update the “effective date” at the top of this Privacy Policy.

You are advised to review this Privacy Policy periodically for any changes. Changes to this Privacy Policy are effective when they are posted on this page.

## Contact Us

If you have any questions about this Privacy Policy, please contact us:

- By email: [info@hdsk.org.uk](mailto:info@hdsk.org.uk)
- By visiting: <https://hdsk.org.uk/contact/contact.html> on our website