

# Privacy and Personal Data Protection Policy

## Data Controller

The controller of your personal data is the non-profit organization Impact with Partners Initiative (hereinafter referred to as the "ASBL" or "IPI"), located at the following address: Bujumbura, Burundi, city center, Avenue du Marché, Galerie DIKO, office number 10. The ipi.bi website is managed by the non-profit organization with all necessary measures and precautions.

The Privacy and Personal Data Protection Policy applies to all processing carried out by Impact with Partners Initiative and its entire structure, particularly through its ipi.bi website. The processing of your personal data by Impact with Partners Initiative is subject to the legal

provisions applicable in Burundi, relating to the protection of individuals with regard to the processing of personal data and the free movement of such data (General Data Protection Regulation, hereinafter referred to as the "GDPR") and to Law No. 1/10 of March 16, 2022 relating to the protection of individuals with regard to the processing of personal data.

## Personal Data

### Active Collection of Personal Data

Impact with Partners Initiative has access to the data you voluntarily provide to us, either through your registration form and/or your child's registration form on the ipi.bi website, or when registering for one of our activities via the Impact with Partners Initiative website. This data is stored by Impact with Partners Initiative in digital and/or paper form, as appropriate.

When data concerns children, it is collected directly from the person with parental responsibility over the child. The following categories of personal data may be collected in this context:

Identification data: first name, last name, relationship to a member

Contact data: postal address, email address, telephone number

Banking and tax data: account number and amount of payments to the non-profit organization

Medical data: allergies and conditions impacting activities

Data relating to the non-profit organization: activity registrations, image rights.

## **Legal Basis for Processing Personal Data**

The processing of your data is based on your consent, in accordance with the GDPR. In this case, you provide your personal data to Impact with Partners Initiative, being informed of its

intended use, and you agree to its terms.

In certain cases, the processing of your personal data is necessary for the performance of a contract between you and Impact with Partners Initiative.

- For members: the processing of your data is necessary to allow the non-profit organization to affiliate you and to comply with the legal obligations, as well as the administrative, accounting, and tax aspects of this affiliation.
- For donors: the processing of your data is necessary to allow the non-profit organization to comply with the legal obligations, as well as the administrative, accounting, and tax aspects of donations.
- For those registered for short training courses: the processing of your data is necessary to enable the non-profit organization to comply with legal obligations, administrative, accounting, and tax matters, as well as to contact you and provide you with all

useful information related to this training.

Impact with Partners Initiative also reserves the right to process your personal data within the framework of the non-profit organization's legitimate interests and on the basis of the contract between you and the non-profit organization. Impact with Partners Initiative will always ensure a balance between its legitimate interests and your rights. Similarly, in the interest of safeguarding the vital interests of its members, the non-profit organization reserves the right to process certain medical data necessary for the proper functioning of the activities offered by the association (one-off activities, weekends, and camps).

### **Processing and Use of Personal Data**

As part of the proper functioning of its activities, Impact with Partners

Initiative processes your personal data for various purposes.

As a user of ipi.bi, your personal data is used for the management and maintenance of the website, the smooth running of activities, correspondence and email exchanges, the sending of publications (activity calendar), and the newsletter.

As a member of Impact with Partners Initiative, your personal data is used for your protection and medical assistance if necessary, the smooth running of activities, grant management, correspondence and email exchanges, membership inventory, and the sending of publications and the newsletter.

In general, communications from Impact with Partners Initiative may be made by email, postal mail, text message, or telephone.



## **Sharing of Personal Data**

Impact with Partners Initiative's activities are managed by volunteer members, known as "facilitators." The data of other members, known as "participants," and, where applicable, the persons legally responsible for them, may be shared with the facilitators for processing purposes in accordance with the aforementioned provisions. Impact with Partners Initiative undertakes to ensure that the latter comply with the provisions of these general terms and conditions and the GDPR.

Except in cases where it serves its legitimate interest, Impact with Partners Initiative does not share your data with third parties without your express consent. Impact with Partners Initiative does not sell, rent, or disclose your data to third parties for commercial purposes without your consent.

## **Retention Period of Personal Data**

When you give your consent for the processing of your personal data by Impact with Partners Initiative, the non-profit organization retains it until you withdraw your consent. The data is kept for the time necessary to achieve the purposes for which it is processed and in accordance with legal requirements. The data will in any case be kept until the expiry of the limitation period in contractual matters under the applicable legislation.

## **Personal Data Security**

Impact with Partners Initiative makes every effort to ensure the security of your personal data and is committed to taking all necessary precautions to preserve the security of this information, including ensuring that it is not disclosed to unauthorized persons.

However, since the Internet is not a completely secure means of

information, a complete guarantee of privacy cannot be guaranteed. In this regard, Impact with Partners Initiative's commitment is limited to an obligation of means in this regard and not an obligation of results.

To maximize the security of your personal data, access to the non-profit organization's member database is protected by a personal login and password and is strictly reserved for those authorized to access it. All permanent employees and Impact with Partners Initiative coordinators are aware of the need to protect the personal data of all members. Should an incident occur, particularly in the context of a personal data breach, Impact with Partners Initiative undertakes to promptly inform the non-profit organization's members and inform them of the corrective measures taken.

## **Subcontractors**

Impact with Partners Initiative carefully selects its subcontractors and ensures that the contractual provisions with them comply with the GDPR.

When Impact with Partners Initiative transfers your personal data to its subcontractors, it does so only on the basis of an agreement that limits the use of this personal data with the subcontractor to the processing necessary to fulfill the subcontracting agreement and requires the subcontractor to take necessary security measures for this data. Subcontractors are not authorized to sell, rent, or otherwise transmit your personal data provided to them.

## **GDPR Officer – Contact**

For any questions or requests regarding the protection of your data, or if you believe that your rights or personal data are not being respected, you can contact the Impact with

Partners Initiative Data Protection Officer by sending an email to [ipi-info@ipi.bi](mailto:ipi-info@ipi.bi).

### **Possible Changes**

Impact with Partners Initiative reserves the right to modify any information contained in the Privacy Policy. However, these changes will not affect any of your rights. The policy is permanently available for consultation via the [ipi.bi](http://ipi.bi) website.

**Impact with Partners Initiative**