

1. Your Privacy is respected

This policy outlines how personal information provided by you, or collected by The Leprosy Mission

Nigeria (TLMN) about you, is used and managed. TLMN will review and update this Privacy Policy on a regular two yearly basis.

2. Collection of Data

The type of information collected and retained by The Leprosy Mission Nigeria includes personal information, including sensitive information about:

- Individual donors and supporters
- Job applicants;
- Staff members;
- Trustees;
- Volunteers;
- Contractors; and
- Other people who come into contact with TLMN.

Where it is lawful and practicable, TLMN shall provide individuals with the option of not identifying themselves when entering into transactions.

3. Personal Information Personally Provided

TLMN collects personal information held about an individual by way of forms filled out, face to face meetings and interviews, telephone calls, facsimiles, emails, online data collection forms and delivery of services.

4. Personal Information Provided by other People

In some circumstances, TLMN may receive personal information about an individual from a third party, for example referrals, requests for information to be sent, etc.

5. Personal information obtained without request

If TLMN has received personal information that was not requested, it will be destroyed or deleted unless it could have been lawfully solicited for the stated purposes.

6. Use of images and Stories

Where practicable, TLMN shall take reasonable steps to obtain consent from an individual to collect and use images, stories or any other personal identifiable information that relates to that individual.

7. Employee Records Exemption

TLMN Privacy Policy does not apply in relation to the treatment of an employee record where the treatment is directly related to current or former employment between the employee and TLMN.

8. Job applicants and contractors

In relation to personal information of job applicants and contractors, the primary purpose of collection is to assess the applicant or contractor's suitability for the position. Following the

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completion of the probation period by the successful applicant personal information of other applicants will be destroyed within a period of 6 months.

9. Use and Purpose of Collection

The primary purpose of collection is for the sole use of TLMN informing you of its services, programs and product offerings and to enable them to provide information/services to and for such other secondary purposes that are related to the primary purpose of collection and can reasonably be expected to so relate, or to which you have personally consented.

The purposes for which TLMN uses personal information include:

- To keep you informed about matters related to the organisation's activities through correspondence, emails, facsimiles, newsletters and magazines
- Day-to-day and special activities
- Operational matters of TLMN

The recording of contact or file notes shall exclude value judgements or personal statements about an individual.

10. Marketing

TLMN's marketing functions support the growth and development of the Mission. Personal information will not be disclosed to a third party organisation that assists in marketing except to a contracted third party that provides services in the ordinary operation of TLMN such as a mail-house.

11. Disclosure of Personal Information

TLMN shall not disclose personal information to any third party, except where:

- Those parties are contracted to TLMN and working directly on behalf of TLMN (e.g. mail house)
- Personal information is used by volunteers to perform services directly related to the operation of TLMN.
- TLMN is required or authorised by law to do so.

TLMN typically assigns a unique supporter number to each individual supporter. This number shall not be disclosed to anyone other than the supporter, except as outlined above.

12. Sending information overseas

TLMN will not send personal information about an individual outside Nigeria without:

- obtaining the individual's consent; or
- taking reasonable steps to ensure recipient does not breach APPs; or
- ensuring that the overseas recipient is subject to similar laws.

TLMN is most likely to send personal information overseas when a person is going on behalf of, or on an event organised by or with, TLMN.

Sensitive Information

Sensitive information, such as a person's religious affiliation, may be collected by TLMN in connection with its activities. Such information will not be disclosed without the individual's consent and only if relevant to the activity nor will it be used for targeted fundraising purposes.

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13. Management and Security of Personal Information

The TLMN staff are, as a condition of their employment, expected to respect the confidentiality of personal information and the privacy of individuals by signing an agreement.

TLMN has in place systems to protect the personal information it retains, including a system of password security for computer data files and security cupboards or locked rooms for physical documents. Documents with personal information are stored in a non-public area in a secure building.

14. Personal Information Update

TLMN tries to ensure that the personal information it retains is accurate, complete and up-to-date. To update their personal information a person may contact the Administrative Assistant during office hours.

15. Access to Personal Information

An individual has the right to obtain access to any personal information TLMN retains and to advice of any perceived inaccuracy. Please contact the Administrative Assistant in writing if you wish to obtain access.

16. Monitoring

TLMN will monitor annually information handling practices to ensure they are secure.

17. Enquiries

Information about how to complain if you feel a breach of privacy has occurred and how your complaint is dealt with may be obtained from the Administrative Assistant or the TLMN website.

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18. Policy Review

This Policy will be reviewed in 5 years.

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Revision History

١	/ersion	Date	Author	Summary
	1.0	21/10/2018	Sunday Udo	New draft created for next revision

Document Approval History

Version	Date	Approved by
1.0	November 8, 2018	TLM-Nigeria Board

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