

World Toilet Organization Privacy Policy

Last Updated: 28th March 2024

1. Introduction

The World Toilet Organization Limited (hereinafter "World Toilet Organization", "we", "us" or "our") is committed to protecting the privacy of all of our volunteers, donors, members, beneficiaries, supporters, and users that visit our Website (accessible at <https://worldtoilet.org/>). This Privacy Policy describes how we collect, use, disclose and/or process your personal data when you:

- (a) interact with us;
- (b) submit your data or information to us; and/or
- (c) access or use our Website.

We will only use your personal data where you have given us your consent or where we have another lawful basis for doing so, and in the manner set out in this Privacy Policy. By providing us with your personal data, you acknowledge that our collection, use, disclosure and processing of your personal data will be in accordance with this Privacy Policy including, for the avoidance of doubt, any cross-jurisdictional transfer of your personal data.

This Privacy Policy supplements but does not supersede or replace any consents that you may have provided to us, or any other agreements or arrangements that you may have with us, in respect of your personal data.

2. What is Personal Data

"Personal data" refers to any data, whether true or not, about an individual who can be identified from that data; or from that data and other information to which we have or are likely to have access, including data in our records as may be updated from time to time.

3. Personal Data We Collect About You

Depending on the nature of your interaction with us, we may collect, use, disclose and/or process the following types of personal data from you, including when you access and/or use our Website to make a donation, submit an application to volunteer with us, or subscribe to our newsletter:

- Name;
- Gender;
- Date of birth;
- Marital status;
- Employment information
- Photographs;
- Postal address;
- Email address;
- Telephone number; and/or
- IP address.

4. How We Collect Personal Data About You

We generally collect personal data from you when you:

- (a) access or use our Website including to make a donation, submit an application to volunteer with us, subscribe to our newsletter, or sign up to be our member;
- (b) request that we contact you through various communication channels such as through the “Contact Us” function on our Website;
- (c) interact with our staff, volunteers or representatives, for example, via telephone calls (which may be recorded), face-to-face meetings, email or social media;
- (d) sign up for or participate in any events, surveys or activities organized or hosted by us;
- (e) respond to our request for additional personal data, or our other promotions and initiatives;
- (f) share comments or provide feedback to us (including reports on any problems or issues with our Website); and/or
- (g) submit your personal data to us for any other reason.

5. Accuracy and Completeness of Personal Data

You are responsible for ensuring that all personal data that you provide to us is true, accurate and complete. You are responsible for informing us of any changes to your personal data.

6. Providing Personal Data Belonging to Others

In certain circumstances, you may provide us with personal data of persons other than yourself (e.g. your spouse or parents). If you do so, you represent and warrant that you have brought this Privacy Policy to his / her attention, informed him / her of the purposes for which we are collecting his / her personal data and that he / she has consented to your disclosure of his / her personal data to us for those purposes and accepts this Privacy Policy. You agree to indemnify and hold us harmless from and against any and all claims by such individuals relating to our collection, lawful use, disclosure and other processing of such personal data in accordance with the terms of this Privacy Policy.

7. Cookies and Other Technologies

As you access and use our Website, we may use “cookies” to collect certain data including:

- (a) details relating to your use of our Website, including traffic data, location data, logs, other communication data and the resources that you access and use on our Website; and
- (b) information about your computer and internet connection, including your IP address, operating system, and browser type.

A cookie is a small file stored via your browser on the hard drive of your computer or device. The data collected from the cookies is used to improve the functionality of our Website and to tailor our Website's behavior and content to your preferences.

Most internet browsers are set up by default to accept cookies. However, you may delete or refuse to accept such cookies by adjusting the settings on your browser accordingly. Unless you have adjusted your browser setting to disable or block cookies, our system will issue cookies as soon as you visit our Website. Please note that if you choose to refuse or delete the cookies associated with or used on our Website, you may not be able to access certain part(s) of our Website, and this may impact your overall user experience whilst on our Website.

8. How We Use Your Personal Data

We collect, use, disclose and/or process your personal data for purposes that are connected with or relevant to our operations, and/or to manage your relationship with us. Such purposes include:

- (a) facilitating your access and use of our Website, and the associated functions and interactive features;
- (b) protecting our Website from unauthorised access or usage and to monitor for security threats;
- (c) verifying your identity, including in our membership and/or volunteer registration records;
- (d) processing, managing, communicating with you, and providing you with information on your membership and/or volunteer application, registration, and experience;
- (e) providing you with information, products, or services that you request from us;
- (f) responding to, processing and handling your queries, requests, feedback and suggestions, or otherwise providing support;
- (g) managing our administrative and business operations, including to fulfill our core business purposes and comply with our internal policies and procedures;
- (h) organizing and hosting promotional and fundraising efforts, activities, programs and initiatives;
- (i) requesting feedback or participation in surveys, as well as conducting market research and/or analysis for statistical, profiling or other purposes for us to design our products, services, programs and initiatives, and to understand your preferences and market trends, and to review, develop and improve the quality of our products, services, programs and initiatives;
- (j) resolving any disputes, investigating any complaint, claim or dispute or any actual or suspected illegal or unlawful conduct;

- (k) compliance with any legal or regulatory obligations, applicable laws, regulations, codes of practices, guidelines, or rules, or to assist in law enforcement and investigations conducted by any governmental and / or regulatory authority;
- (l) in connection with any claims, actions or proceedings, and/or protecting and enforcing our contractual and legal rights and obligations;
- (m) notifying you about changes to our Website or any products, programs, initiatives, or services that we offer or provide;
- (n) managing and engaging third parties or data processors that provide services to us, including IT services, technological services, delivery services, and other professional services; and/or
- (o) any other purposes relating to or reasonably necessary for any of the above, or that may be informed to you when your personal data is collected.

Where personal data is used for a new purpose and where required under applicable law, we shall obtain your consent.

9. Marketing Purposes

In order for us to market products, programs, initiatives, events and/or services which are of specific interest and relevance to you, we may analyze and rely on your personal data provided to us or data collected from your interactions with us. However, no marketing will be carried out unless you have provided us with your consent to use your personal data for such marketing purposes.

10. Disclosure of Your Personal Data

We may disclose your personal data to the following entities or third parties, whether located in Singapore or overseas, for the purposes set out under Section 8 above:

- (a) contractors, service providers (including IT and software providers) and other third parties that provide services to us;
- (b) vendors or other third-party service providers, including in connection with marketing promotions, products and services offered by us;
- (c) our affiliates and related entities;
- (d) banks, credit card companies and their respective service providers;
- (e) our professional advisers such as our board of directors, auditors and lawyers;
- (f) relevant government regulators, government ministries, statutory boards or authorities and/or law enforcement agencies, to comply with any directions, laws, rules, guidelines, regulations or schemes issued or administered by any of them;
- (g) external business and charity partners in relation to promotional or fundraising events, initiatives and programs;

- (h) any court, arbitrator, mediator, adjudicative or dispute-resolution body, or third party involved in the dispute with us, to defend, initiate, or pursue a legal claim or action which we are party to or involved in, or comply with any order, judgement or decision; and/or
- (i) any other party to whom you authorize us to disclose your personal data to.

11. Data Subject Rights

Depending on the jurisdiction that you are in or where we operate, you may enjoy certain rights under applicable law in relation to our collection, use, disclosure and/or processing of your personal data. Such rights may include:

- (a) **Access:** you may request access to a copy of and information on the personal data that we hold about you.
- (b) **Correction:** you may request that any incomplete or inaccurate personal data that we hold about you is completed or corrected.
- (c) **Withdrawal of consent:** you may withdraw your consent to our collection, use, disclosure and/or processing of your personal data at any time. The withdrawal of your consent will not affect the lawfulness of the processing of your personal data based on your consent before your consent was withdrawn.

However, if you withdraw your consent to any or all collection, use, disclosure and/or processing of your personal data, depending on the nature of your request, we may not be in a position to continue to provide our products or services to you, administer any contractual relationship already in place, or perform or conclude an existing or prospective agreement. This may also result in the termination of any agreements you have with us, and your being in breach of your contractual obligations or undertakings. Our legal rights and remedies in such event are expressly reserved.

If you wish to exercise any of your rights, you may contact us in accordance with Section 17 below. We may require that you submit certain forms or provide certain information to verify your identity and to process your request. Where permitted by law, we may also charge you a fee to process your request.

12. Data Storage and Retention

Your personal data is retained by us for as long as necessary to fulfill the purposes for which your personal data was collected, and any other legal or business purposes.

13. Personal Data of Children

We do not provide products or services directly to children under the age of 16, nor do we typically accept children under the age of 16 as volunteers (any exceptions require the explicit consent of a

parent or legal guardian in all facets of the process). As a result, we do not proactively collect personal data from children under the age of 16 (whether via our Website or otherwise).

If you are a parent or legal guardian and you have reason to believe your child or ward has provided us with their personal data without your consent, please contact us at the contact details provided under Section 17 below.

14. Data Security

We employ reasonable security arrangements to protect the personal data in our possession or under our control. However, we cannot completely guarantee the security of any personal data that we may have collected from or about you, or that no harmful code (e.g. any virus, bugs, trojan horses, spyware or adware) will enter our website. You should be aware of the risks associated with your use and access of our Website. Further, we cannot guarantee the security of data transmissions or storage systems, and we urge you to take every precaution to protect your personal data when you access and use our Website. Because email communications are not always secure, please do not include any credit card or other sensitive personal data information in your emails to us.

If you have reason to believe or suspect that your interaction with us is no longer secure, please immediately notify us at the contact details provided under Section 17 below.

15. Third Party Links

Our website may contain links to other third-party websites or platforms that are not owned, operated or maintained by us, such as Facebook, Instagram, Flickr, and Twitter. These links are provided for your convenience only and we assume no responsibility for the privacy practices of websites or platforms operated by third parties which may be linked to our website. When accessing or using such third-party websites or platforms, their respective privacy policies or privacy notices will apply. We encourage you to read the applicable privacy policies or privacy notices of these third-party websites or platforms to understand how they will handle the data and information they collect from you.

16. Changes to Our Privacy Policy

The date on which this Privacy Policy was last revised is indicated at the top of this document. We may amend, change, add, modify or remove portions of this Policy from time to time without notice to you (for example, to ensure that this Privacy Policy is consistent with our future developments and/or any changes in legal or regulatory requirements), which shall become effective immediately when published or made available [here](#). The updated Privacy Policy will supersede earlier versions and will apply to personal data provided to us previously. Therefore, you are encouraged to regularly check back and review this Privacy Policy to remain updated on any changes. To the maximum extent permissible under applicable law, you agree to be bound by the prevailing terms of this Privacy Policy as may be updated from time to time.

17. Contact Us

If you have any questions, feedback or complaint in relation to your personal data or about this Privacy Policy, or wish to exercise any of your applicable data subject rights, you may contact our Data Protection Officer at:

Email: online@worldtoilet.org

Phone: +65-6850 0200

Mailing Address: 26 Ubi Road 4, #02-00, SDG Center, Singapore 408613

When you contact us, we may require that you submit certain forms or provide certain information, including verification of your identity, before we are able to respond to you.