Privacy Policy

Last updated: March 31, 2024

Giving What We Can USA Inc., and our separate but affiliated organizations in Canada and the United Kingdom, together with our parents, subsidiaries, and affiliates (collectively, "**GWWC**," "**we**," "**us**," or "**our**"), is committed to protecting the privacy and security of the personal information we process.

Who we are and how you can get in touch

Giving What We Can USA Inc. is a registered Section 501(c)(3) public charity in the United States (EIN 93-3629215) with a registered office at 651 N. Broad Street, Suite 201, Middletown, Delaware 19709, USA.

Giving What We Can UK is a UK company limited by guarantee (Company Number 15442716) with a registered office at 71-75 Shelton Street, Covent Garden, London, WC2H 9JQ, United Kingdom.

Giving What We Can Canada is a Canadian nonprofit (Business Number 758609556RC0001) with a registered office at 7700 Hurontario St, Brampton, Ontario, L6Y 4M3, Canada.

If you have questions in relation to this Privacy Policy or on how we use your personal information, please contact us at: info@givingwhatwecan.org.

What does this notice cover?

This Privacy Policy describes how GWWC collects, uses, and shares your personal information when you:

(1) visit our website, https://www.givingwhatwecan.org/, and any other sites or applications containing a link to this Privacy Policy (collectively "**Websites**"); or

(2) interact with us through social media pages, email, or offline (for example, when you apply for a role within our organization or volunteer at one of our events) (collectively, and together with the Websites, the "**Platform**").

It also provides additional details regarding how we process the personal information of individuals located in certain regions or jurisdictions, such as individuals located in the European Economic Area, United Kingdom ("**UK**"), and Switzerland (for purposes of this Privacy Policy, collectively, "**Europe**"), including a description of rights you may have over your personal information under such data protection laws.

GWWC may have other unique privacy notices that apply to specific situations. To the extent you were provided with different privacy notices that are applicable, those notices will govern our interactions with you, not this one.

If you provide us with personal information of anyone other than yourself (such as a friend or family member), please note that you are responsible for complying with all applicable privacy and data protection laws prior to providing that information to us (including obtaining consent, if required). Please do not provide us with someone's contact information unless you have their permission to do so.

If you have any questions, please contact us using the details in the "Who we are and how you can get in touch" section above.

What personal information do we collect?

We may collect and process your personal information:

(a) directly from you (including through online forms or in conversation with staff during the course of service delivery),

(b) from the device(s) you use to access the Websites,

(c) from third parties (for example if a potential partner provides information as part of due diligence), and

(d) from public sources (such as LinkedIn).

Personal information we collect from you directly

- **Identity and Contact Data** such as your name, profession and organizational affiliation, date of birth, mailing address, email address, and phone number. We may request additional information to verify your identity when you make a donation or pledge, or contribute to our funds.
- **Account Data** including username and password, and transaction history.
- **Transaction Data** including billing address, bank, and payment card information when used to make a donation. For residents of the UK, we ask for UK taxpayer status for Gift Aid purposes.
- **Marketing Preferences** including any consents you have given us.
- The content of your **Communications** or any other personal information you provide to us directly, such as information provided voluntarily in relation to your profession, your salary after tax, and your date of birth.
- **Survey Responses**, such as the information you provide in response to our surveys or questionnaires.
- **Professional Information** including that regarding your career interests, goals, and plans as well as your professional experience and qualifications, right to work status, and other CV information.
- **Interests and Involvement** such as which causes or charities you are interested in or supporting or your participation in GWWC or effective altruism groups.

- **Demographic Information** such as country of residence, gender, age, income or education.
- **Service Engagement** with GWWC, such as your attendance at relevant events or activities on the Platform.
- **Photos or Videos** from GWWC events in which you may participate and similar information.
- **Biographical and Background Data** including information that we may ask you as part of our hiring process (such as details about your background and any other reflections that you have about yourself as a candidate and that you choose to provide to us), community user interviews, or member profile interviews for our blog or social media.

Where we need your information to collect a donation, to open an account and to review you for some service, we will not be able to do so if you do not provide us with it.

Unless we specifically request it, we ask that you not provide us with any sensitive personal information (e.g., information related to racial or ethnic origin, political opinions, religion or other beliefs, health, biometrics or genetic characteristics, criminal background, or trade union membership).

Personal information we collect from your device(s)

We may collect information from the device(s) you use to access the Websites such as your Internet Protocol (IP) address; device type and version number; wireless carrier; manufacturer and model; browser type; dates and times you visit and use the Websites; activity on the Websites (including information about your activity on a page or screen, pages or screens viewed, time spent on a page or screen, navigation paths between pages or screens) and referring websites or applications; Uniform Resource Locators, or URLs (i.e., website addresses) visited prior to arriving and after leaving our Websites; and approximate geolocation (such as city, state, or geographic area). We typically collect this information through the use of cookies and similar technologies, such as:

- Cookies, which are text files that websites store on a visitor's device to uniquely identify the visitor's browser or to store information or settings in the browser for the purpose of helping you navigate between pages efficiently, remembering your preferences, enabling functionality, helping us understand user activity and patterns, and facilitating online advertising.
- Flash cookies, or locally stored objects, which are used on websites for purposes similar to cookies but allow storage of a larger amount of data.
- Web beacons, also known as pixel tags or clear GIFs, which are typically used to demonstrate that a webpage or email was accessed or opened, or that certain content was viewed or clicked, typically to compile statistics about usage of websites and the success of marketing campaigns.
- Local storage, which is used to save data on a visitor's device. We may use data from local storage to, for example, turn on web navigation, store multimedia preferences,

customize what we show you based on your past interactions with our Websites, and remember your preferences.

- Session-replay technologies, which are third-party software programs that we may use on the Websites to record a video replay of a visitor's interactions with the Websites. The video replay may include users' clicks, mouse movements, scrolls, mobile app touches, typing, and other activity taken during the session. We use these replays for research and development purposes, such as to help us troubleshoot problems with the Websites, understand how users interact with and use the Websites, and identify areas for improvement.

For more information on how we use cookies, please see our Cookie Notice.

When you sign up for our newsletters, we may track when you open emails and click links in our email campaigns. We will not be able to provide you with our newsletter service if you do not provide us with this information.

Personal information we collect from third parties

We may collect your personal information from third parties, such as our service providers, advertising partners, event sponsors, data providers, and other third parties, including the following:

Giving What We Can groups

Giving What We Can groups may pass on data about their group members to GWWC so that we can better understand community engagement and provide better resources and opportunities to those community members. This information may include, without limitation:

- name, email address, and phone number;
- study or employment information; and
- involvement in effective altruism (e.g., cause area interests or participation in EA groups).

Other organizations and industry experts

We work closely with organizations and industry experts in identifying and filling opportunities. Those opportunities may include jobs, grants, volunteer roles, scholarships, conferences and fellowships related to these cause areas. Those organizations and industry experts may pass on data to us about individuals they interact with such as job applicants, employees, or volunteers so that we can assess them as potential recipients of our services, provide services to them, or consider them for a role.

We may also ask trusted informal advisors in their relevant areas to get advice, such as help assessing a grant application or to get formal or informal references in recruiting.

Publicly available sources

We may collect personal information about you from publicly available sources, including social media sites (e.g., LinkedIn) or news articles. Such information may include (as relevant) your education, employment history, and credentials.

We may do this, for example, when you apply for a role within our organization, as part of headhunting work, when conducting donor due diligence, or considering you for other opportunities related to our work.

Social media networks

If you choose to login to your GWWC account via a third-party platform or social media network, or otherwise connect your account on the third-party platform or network to your account through the Websites, we may collect information from that platform or network. For example, this information may include your social media handle, user ID, profile picture, cover photo, and networks to which you belong (e.g., school, workplace). You may also have the opportunity to provide us with additional information via the third-party platform or network, such as a list of your friends or connections and your email address. You can read more about your privacy choices in the "Your choices regarding your personal information" section below.

Referees

When you apply for a role within our organization (including to be a trustee), we may ask you to provide us with details of individuals who can provide a reference on your behalf. If you do so, we will obtain personal data about you from these referees as part of the application process.

How do we use your personal information?

In addition to the purposes discussed elsewhere in this Privacy Policy or disclosed to you at the time of collection, we may use your personal information for the following purposes:

To provide the services. We use personal information to provide the services and to operate our nonprofit, including:

- to receive and process donations, assess grant requests, conduct due diligence (including verifying your identity), and process grants including making donations and communicating with donors and grantees regarding same;
- to assess your suitability for services, events, funding, collaborations, roles, or other opportunities at GWWC or at organizations GWWC is assisting, and to suggest you for, or contact you about, any of these things;
- as part of our process for appointing trustees, including to determine your suitability to become a trustee of a GWWC organization;
- to create any accounts you request and maintain or moderate platforms we run;
- to improve and customize your experience on or with the Platform and services;

- to communicate with you regarding notices about the Platform, services, or your account, and responding to any of your requests, feedback, or questions;
- to run events that you participate in;
- to provide any surveys you participate in; and
- to fulfill any other purpose for which you provide personal information.

Research and development. We use personal information to conduct research, assess the impact of our work, support discussion of ideas and research, and publish related content to promote our work and values through, for example, case studies and blogs. We also use data analytics to improve our Platform, services, online forums or sites, marketing efforts, and user experience. As part of these activities, we may create aggregated, de-identified, or other anonymous data from personal information we collect. We make personal information into anonymous data by removing information that makes the data personally identifiable to you. We may use this anonymous data and share it with third parties for our lawful business purposes.

Direct marketing. We use personal information in connection with our services by sending you direct marketing communications as permitted by law, including materials, updates, and related information about our services, charitable organizations, and events, including requests to contribute to online discussions, undertake surveys and give feedback, and provide financial support for, and encourage social sharing of, your pledge or donation, and to otherwise provide you with information we think may be useful or of interest to you.

For compliance, fraud protection, and safety. We use personal information to (a) carry out proper governance on our funding and make public reports about donations (such reports will not directly identify you, but we will use your personal information when creating them); (b) protect our, your, or others' rights, privacy, safety or property (including by making and defending legal claims); (c) audit our internal processes for compliance with legal and contractual requirements and internal policies; (d) enforce the terms and conditions that govern the Platform and services; (e) administer and protect GWWC, our initiatives, our people, and our Platform, databases, and other technology assets; (f) prevent, identify, investigate, and deter fraudulent, harmful, unauthorized, unethical or illegal activity, including cyberattacks and identity theft; and (f) generally protect our legal rights and comply with law and regulation.

Interest-based advertising. We also work with third-party advertising companies and social media companies to help us advertise our nonprofit and display ads for our services. These companies may use cookies and similar technologies to collect information about you (including the information described in the "Personal Information we collect from your device(s)" section above) over time across our Websites and other websites and services or your interaction with our emails, and use that information to serve ads that they think will interest you. In addition, some of these companies may use hashed customer lists that we share with them to deliver ads to you and to similar users on their platforms. You can learn more about your choices for limiting interest-based advertising in the "Your choices regarding your personal information" section below.

With Your Consent. We will disclose your personal information in accordance with your prior direction or, in some cases, we may specifically ask you for your consent to collect, use, or share your personal information, such as when required by law.

How do we share your personal information?

We may share your personal information with third parties as set forth below or as otherwise described in this Privacy Policy or at the time of collection.

Affiliated organizations

GWWC may share personal information with its current or future affiliated (but independent) charities and organizations that share common goals and who may share certain resources with GWWC.

Please note that, in many cases, the personal information collected by a specific GWWC project to deliver their services, will remain within, and only accessible to, the GWWC project that originally collected it, rather than shared with staff of other GWWC projects.

Supported programs

If you make a donation to one of our supported programs, we will ask you if you would like to disclose your name and email address with the entity (typically a registered charity) delivering the program. Charities find it helpful to know where the donations they receive come from to allow them to:

- reconcile donor lists with their own records;
- track conversions; and
- send you details of their work and appeals for donations.

We will only send this information if you give your permission for us to do so. Whilst we make every effort to ensure that they do not use your personal information in a way which you would not expect, we will not be able to control what they do with it or who it is further disclosed to.

We will ask you every time you make a donation, but be aware that if your personal information is disclosed once, we will not be able to force them to delete it. They may not know that any subsequent donations you make to them have come from you, but they will still have your personal information on file from the first time you donated and agreed that we could pass it on. If you do not wish to pass your personal information, we will still make the donation on your behalf and you will still be eligible for Gift Aid (if applicable).

Service providers

We may share your personal information with third-party service providers, who will process it on our behalf for the purposes identified above. We use third-party providers of certain services such as but not exclusively website hosting, website analytics, interest-based advertising services, marketing automation, payment processing, IT maintenance, and identity verification.

We also pass information to our payment processing partner when you make a payment such as a donation—we do not generally store your card details when doing so.

Advertising partners

We may share personal information with third parties who we partner with for advertising campaigns or to solicit new potential donors, or that collect information about your activity on the Websites for the purposes described in the “Interest-based advertising” paragraph above.

Professional advisors

We may share personal information with persons, companies, or professional firms providing GWWC with advice and consulting in accounting, administrative, legal, tax, financial, debt collection, and other matters, to the extent such information is necessary to provide the services to GWWC.

Authorities and others for compliance, fraud prevention, and safety

We reserve the right to pass on your personal information when there is a legal or “duty of care” imperative, for example, if we need to safeguard other individuals, and with government authorities and/or law enforcement officials if required for the purposes described in the paragraph above titled, “For compliance, fraud prevention, and safety,” if required by law, in connection with any legal process or potential legal process, in response to valid requests by public authorities (e.g., a court or a government agency), or if required to protect our legitimate interests (e.g. with HMRC for tax regulation purposes in the UK).

Trustees

If you are applying to become a trustee of GWWC organization, we may share your personal information with other trustees and senior individuals within GWWC (both abroad and the US) as part of your application, and in order to determine whether you are suitable for the role that you have applied for.

Investors and business transaction participants

We may disclose personal information to third parties, such as funders and investors to help our organization grow, and in connection with any business transaction (or potential transaction) involving the closure of all or part of our organization, a merger, consolidation, reorganization, or other transaction involving all or a portion of our organization.

How do we secure your personal information?

Although we use reasonable security measures designed to protect your personal information, the transmission of data over the internet (including by email) is never completely secure. We work to protect personal information, but we cannot guarantee the security of information transmitted to or by us.

Where we have given you (or where you have chosen) a password that enables you to access certain parts of our Websites, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.

How long do we keep your personal information?

We will keep your personal information for as long as we need it to achieve the purposes for which we collected it, to comply with our legal, regulatory, accounting, or reporting obligations, to exercise our legal rights, and to protect ourselves from legal claims.

If we no longer need this personal information for the purposes set out in this notice, we will delete it or anonymize it so that nobody can identify you from the information.

Cross border transfers

GWWC is based in the United States, and its affiliated but separate organizations are located in Canada, the UK, and potentially elsewhere. Additionally, we have service providers and affiliated organizations in the United States and potentially other countries. Your personal information may be collected, used, and stored in these countries or other locations outside of your home country. Privacy laws in the locations where we handle your personal information may not be as protective as the privacy laws in your home country. By providing your personal information, where applicable law permits, you specifically and expressly consent to such transfer and processing and the collection, use, and disclosure set forth herein.

Users located in the EEA, UK, and Switzerland can view more information about cross-border transfers in the section below titled "Additional information for EEA, UK, and Swiss users."

Your choices regarding your personal information

Subject to applicable privacy laws, you may have the right to ask us for a **copy** of your personal information; to **correct**, **delete**, or **restrict** (stop any active) processing of your personal information; and, in certain cases, to **obtain** the personal information you provide to us in a "structured, machine readable format." You may also be able to **object** to the use of your personal information in some circumstances (in particular, when we don't have to use the data to meet a contractual or other legal requirement, or when we are using the data to send you marketing emails).

Where you have given us your **consent** to use your personal information, you can take back that consent at any time. If you do, we will stop using your personal information, unless we collected it for a different purpose (for example, the information is necessary to comply with a legal obligation). If you decide to take back your consent, this will not affect the lawfulness of our actions before you made that decision. This means that our use of your personal information before you took back your consent remains legal.

The rights described in this Privacy Policy may be limited, for example, if answering your request would reveal personal information about another person or if you ask us to delete information which we are required by law to keep or have important legitimate interests to keep.

To exercise the rights listed in this section, please follow the respective directions or contact us as provided in the "Who we are and how you can get in touch" section above. We will process your request as required under applicable law.

Access, update, or delete account information

In some cases, if you have registered for a certain type of account with us, you may be able to review and update certain personal information in your account profile by logging into the account. You may also delete your account. Note that we may keep historical information in our backup files as permitted by law. If the Websites do not permit you to update or correct certain personal information or to delete your account, please submit a request to us using the contact information provided in the "Who we are and how you can get in touch" section above.

Marketing communications

You may opt out of marketing-related emails by following the opt-out or unsubscribe instructions at the bottom of the email, or by contacting us as provided in the "Who we are and how you can get in touch" section above. You may continue to receive transaction-related and other non-marketing emails.

Text messages

We may offer communications via text messages sent by GWWC or any of our service providers, such as for providing a donor or grantee service or marketing purposes. To stop receiving text messages from us, reply STOP to any text message you receive from us, or send your request and mobile telephone number to the email address provided in the "Who we are and how you can get in touch" section above. Note that we may send you a message to confirm receipt of your STOP request.

Third-party platforms or social media networks

If you choose to connect to your GWWC account via a third-party platform or social media network, you may have the ability to limit the information that we may obtain from the third-party platform at the time you login using the third party's authentication service or otherwise connect your account. Subsequently, you may be able to control your settings through the third-party platform or service. For example, you may access and change your settings through the Facebook settings page. If you withdraw our ability to access certain information from a third-party platform or social media network, that choice will not apply to information that we have already received from that third-party.

Cookies

You can control the type of information collected through our Websites through the use of cookies and similar technologies by changing your web browser settings. For more information about cookies, including how to see what cookies have been set on your browser and how to

manage and delete them, visit www.allaboutcookies.org. Please visit our Cookie Notice for more information, including how to access and change your cookie preferences on the Websites.

Analytics

We use Google Analytics to help us analyze how our Websites are being accessed and used. You can learn more about Google Analytics cookies by clicking here and about how Google protects your data by clicking here. To opt-out of Google Analytics, you can download and install the Google Analytics Opt-out Browser Add-on, available here.

Advertising choices

You can limit the use of your information for interest-based advertising by blocking third-party cookies in your browser settings, using browser plug-ins/extensions, or using your mobile device settings to limit the use of the advertising ID associated with your mobile device. You can also opt out of interest-based ads from companies participating in the following industry opt-out programs by visiting the linked websites: the Network Advertising Initiative (http://www.networkadvertising.org/managing/opt_out.asp), the Digital Advertising Alliance (https://optout.aboutads.info), or the European Interactive Digital Advertising Alliance (http://www.youronlinechoices.eu/). Some of the companies we work with may offer their own opt-out mechanisms. For example, you can learn more about how Google uses cookies for advertising purposes by clicking here and opt-out of ad personalization by Google by clicking here.

Many of the opt-out preferences described in this section must be set on each device or browser for which you want them to apply. Please note that some of the advertising companies we work with may not participate in the opt-out mechanisms described above, so even after opting-out, you may still receive interest-based advertisements from other companies. If you opt out of interest-based advertisements, you will still see advertisements online but they may be less relevant to you.

Do Not Track

Some browsers may be configured to send “Do Not Track” signals to the online services that you visit. The Websites currently do not respond to “Do Not Track” or similar signals. To find out more about “Do Not Track,” please visit http://www.allaboutdnt.com.

Other sites and services

The Platform and our services may contain links to the websites or online services operated by our partners or other third parties. These links are not an endorsement of, or representation that we are affiliated with, any third party. In addition, our content may be included on web pages or online services that are not associated with us. We do not control third party websites or online services, and we are not responsible for their actions. Other websites and services follow different rules regarding the collection, use, and sharing of your personal information. We encourage you to read the privacy policies of the other websites and online services you use.

Updates to this Privacy Policy

We reserve the right to change this Privacy Policy from time to time. We will alert you when changes have been made by indicating the date this Privacy Policy was last updated or as otherwise may be required by law. It is recommended that you periodically revisit this Privacy Policy to learn of any changes.

Additional information for California users

Under California Civil Code sections 1798.83-1798.84, California residents who have an established business relationship with us are entitled to ask us for a notice describing what categories of personal information we share with third parties for the third parties' direct marketing purposes. If you are a California resident and would like a copy of this notice, please submit your request to the email address provided in the "Who we are and how you can get in touch" section above with "Shine the Light Request" in the subject line.

Additional information for EEA, UK, and Swiss users

Data protection laws in the European Economic Area, United Kingdom, and Switzerland (collectively, "**Europe**") require us to provide additional information about how we handle the personal information of individuals subject to those laws. If you are located in one of these jurisdictions, the following sections apply to our processing of your personal information. Except as otherwise specified, references to "personal information" in this Privacy Policy are equivalent to "personal data" governed by European data protection legislation.

Our role

For the purposes of European data protection legislation, GWWC is the "controller" of your personal information as it is described in this Privacy Policy. See the section, "Who we are and how you can get in touch" above for additional details. This means we make decisions about how and why your information is used, and have a responsibility to make sure that your rights are protected when we do so.

Legal bases for processing your personal information

We will process your personal information only where we have a legal basis for doing so. The applicable legal bases of our processing of your personal information as described in this Privacy Policy will depend on the type of personal information and the specific context in which we process it. However, the legal bases we typically rely on include the following:

- when we need it to perform a **contract** we are about to enter into or have entered into with you, such as for the purposes of providing the services.
- when it is necessary for our "**legitimate interests**" (or those of a third party) and your interests and rights do not override our interests (unless we have your consent or our processing is otherwise required or permitted by law), such as for the purposes described below.

- when you have given us your **consent**, such as for the purposes of direct marketing or interest-based advertising (where we are unable to rely on our legitimate interest).
- when we need to comply with the **law**, such as for the purposes of compliance, fraud prevention, and safety.

When we refer to our “legitimate interests,” we mean:

- to improve our programs;
- to keep our records updated and to study how our Platform and other services are used;
- to administer and protect the nonprofit and web presence (including troubleshooting, data analysis, testing, system maintenance, support, reporting, and hosting);
- to provide support to the effective altruism community and other field-building efforts including community health, facilitating donations, supporting careers, introducing individuals to events and opportunities, and doing and promoting research;
- to inform our marketing strategies; and
- to best serve our charitable aims in the most efficient manner possible.

For more information on the processing purposes mentioned above and how we use your personal information, please see the “How do we use your personal information?” section above.

Sensitive Information

Certain types of personal information may be considered “sensitive” under European data protection laws, such as information about your race or ethnic origins, political opinions, sex life or sexual orientation, religious beliefs, and health information. We may collect **Sensitive Information** under European data protection laws, in certain circumstances. For example, we may collect:

- certain information about your philosophical beliefs to the extent that these relate to your views on effective altruism;
- if you are attending an event, your dietary and access requirements;
- information about your mental health or other personal circumstances, for example if you provide these to us as part of one of our surveys, or during other interactions (including in the context of our community health services); and
- information about ethnicity, for the purposes of diversity monitoring.

Criminal Offense Data (data relating to criminal convictions and offenses) is also given extra protection under European data protection laws. In some circumstances we may collect Criminal Convictions Data about you, for example during our trustee application process (as part of which we invite you to inform us about your background and any crimes of which you may have been convicted).

We will generally ask for your consent for this Sensitive Information and Criminal Convictions Data, but we may also rely on other legal bases to collect and use it, for example when we need to do so for safeguarding purposes, to protect your vital interests, to obtain legal advice, or because we are subject to a legal obligation.

Your personal information rights

You have the rights listed in the "Your choices regarding your personal information" section above. You also have the **right to complain** to a data protection authority about how we process your personal information. In the UK, the supervisory authority is the Information Commissioner's Office. In the European Economic Area, you can find your data protection regulator here.

To exercise any of your rights, or to make a complaint to us, you can get in touch using the details set out in the "Who we are and how you can get in touch" section above.

Cross-border transfer of your personal information

If we transfer your personal information to a country outside of Europe such that we are required to apply additional safeguards to your personal information under European data protection laws, we will do so. If you want to learn more about this, or to get a copy of the transfer mechanism that we use, please reach out using the details given in the "Who we are and how you can get in touch" section above.