

Gaza40+ Data Privacy Policy

Effective Date: 24/09/2025

Last Updated: 02/01/2026

1. Introduction

Gaza40+ ("we", "our", or "us") is committed to protecting the privacy, confidentiality, and rights of individuals whose data we collect and process. This policy outlines how we collect, use, store, and protect personal data in accordance with the **UK General Data Protection Regulation** (UK GDPR) and the **Data Protection Act 2018**.

This Privacy Policy applies to all personal data handled in connection with our advocacy activities, especially those related to supporting Gazan students with university applications, visa processes, scholarship applications, and other educational opportunities.

2. What Data We Collect

We may collect and process the following categories of personal data from or on behalf of students:

- **Personal Identification and Contact Details:**
Full name in English, sex, date of birth, national ID document, passport number, passport status, passport expiry date, passport document, phone number, email address, location in Gaza, emergency contact details (name, relation).
- **Academic and Scholarship Information:**
Name of school, degree programme, offer letter, type of offer, degree programme start date, whether studied bachelor's in English, English proficiency (spoken and certificates), scholarship details (type, name, coverage, scholarship/financial aid letter), CAS/CoS details including statements and dates, deposit requirements, deadlines.
- **Other Relevant Information:**
Fully funded status, WhatsApp group membership consent, costs not covered, statement of means, deposit requirements, visa application type, type of condition, whether English is spoken at work, and any additional contextual or legal information necessary for advocacy.

- **Financial Declarations:**
Fully funded status, costs not covered, deposit requirements, type of condition.
- **Social Media Accounts (for Finance and Security Vetting):**
Links, usernames, or handles for major platforms (e.g., Facebook, Instagram, TikTok, Twitter/X, or other declared accounts). These will be used only to:
 - Verify the accuracy of financial declarations.
 - Conduct security vetting for safeguarding and risk prevention.
Only publicly available content will be reviewed. No judgments will be made regarding personal, political, or religious views.
- **Consent Questions:**
Consent for data to be held by Gaza40+, consent for data to be provided to the legal team, UK students/staff, WhatsApp group inclusion, and trustees at charities for funding proposals.
- **Additional:**
Tawjihi results or equivalent education qualification.

3. Purpose of Data Collection

We collect and process data solely for the following purposes:

- To support and advocate for students in applications to universities and scholarship programs.
- To assist with UK and other visa applications and immigration processes.
- To communicate with educational institutions, legal representatives, trustees, and relevant authorities on the student's behalf.
- To maintain accurate records of advocacy cases and communications.
- To propose funding or scholarships by sharing necessary information with trustees at charitable organizations.
- To coordinate communication via WhatsApp groups with students and staff for case updates.
- To assess and verify students' financial declarations to ensure fair and equitable allocation of support.
- To conduct security vetting and safeguarding checks to protect students and the organisation.
- To review publicly available information on students' social media accounts solely for financial and security verification purposes.

4. Lawful Basis for Processing

We process personal data under the following lawful bases as defined by UK GDPR:

- **Consent:** We obtain the student's explicit, informed consent to process their data.
- **Legitimate Interests:** Our advocacy work may rely on legitimate interests where such processing is necessary and does not override the student's rights.
- **Legal Obligation:** Where required to comply with UK immigration or university application processes.

Sensitive data (special category data) is only processed with explicit consent and when necessary for the purposes of our advocacy work.

5. How We Store and Protect Data

We implement appropriate technical and organisational measures to protect personal data, including:

- **Secure digital storage:** Data is stored on secure cloud services with **Two-Factor Authentication (2FA)** enabled.
- **Password policy:** Our password policy enforces strong password standards including:
 - Minimum length of **64 characters**
 - Contains **uppercase letters**
 - Contains **lowercase letters**
 - Contains **numerals**
 - Contains **special characters**
 - Passwords must have a **KeePass-accredited entropy greater than 200**, ensuring very high complexity and resistance to attacks
- **Rotating passwords:** Passwords are rotated regularly according to our security schedule.
- **Access controls:** Data is accessible only to authorised team members with role-based permissions.
- **Data minimisation:** We only collect the data necessary for each case.
- **Retention:** We retain personal data only as long as necessary to fulfil the purpose for which it was collected, after which it is securely deleted.

6. Data Sharing and Third Parties

We do not sell, rent, or trade personal data.

We may share data with trusted third parties only when necessary, such as:

- Universities or academic institutions (for application support).
- Legal advisers or immigration solicitors (with consent).
- UK Home Office or embassy officials (for visa processing).
- Trustees at charitable organizations for funding proposals (with consent).

All third parties are required to respect the confidentiality and security of data and to act in accordance with data protection law.

7. Data Subject Rights

Under UK data protection laws, individuals have the following rights:

- **Right to Access** - Request a copy of your data.
- **Right to Rectification** - Request correction of inaccurate data.
- **Right to Erasure** - Request deletion of your data ("right to be forgotten").
- **Right to Restrict Processing** - Request limits on how we use your data.
- **Right to Data Portability** - Request transfer of your data.
- **Right to Object** - Object to processing based on legitimate interests.

To exercise any of these rights, please contact us at: communications@gaza40plus.com

8. Consent and Withdrawal

Where our processing is based on consent, you may withdraw your consent at any time by contacting us. Withdrawal does not affect data processed before the withdrawal date.

9. International Transfers

If data must be transferred outside the UK (e.g., to support university applications abroad), we ensure appropriate safeguards are in place, such as Standard Contractual Clauses or adequate country determinations under UK law.

10. Contact and Complaints

If you have questions or concerns about this policy or your data, contact:

communications@gaza40plus.com

If you are not satisfied with our response, you may lodge a complaint with the UK's Information Commissioner's Office (ICO): <https://ico.org.uk>

11. Policy Updates

This policy may be updated from time to time. We will notify affected individuals of significant changes and update the "Last Updated" date at the top.