

MAGMA Foundation
PRIVACY POLICY

Effective from

29/06/2026

Approved by:

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Dimitris Popov

Council Member

Initiators: Council of Members

Responsible: Council of Members

Next Review: Yearly

Version Control

Release	IssueDate	ChangedDetails	ReviewedBy
Version 1.0	29 th June 2026	First version Policy	MAGMA Foundation

1. INTRODUCTION

MAGMA Foundation ("**the Foundation**", "**we**", "**our**" or "**us**") is a non-profit organisation established in the Republic of Mauritius.

The Foundation is committed to protecting the privacy and confidentiality of the personal data entrusted to it and to processing such data fairly, lawfully, transparently and securely.

This Privacy Policy explains how the Foundation collects, uses, stores, shares and protects personal data relating to donors, beneficiaries, applicants, volunteers, employees, Council members, contractors, service providers, visitors to our website and other individuals who interact with the Foundation.

This Policy has been prepared in accordance with the **Mauritius Data Protection Act 2017** and reflects internationally recognised data protection principles.

2. DATA CONTROLLER

MAGMA Foundation is the Data Controller responsible for the processing of personal data described in this Policy.

Registered Office Rue de L'Institut 4th Floor, Ebene Skies Ebene Mauritius

Email for privacy enquiries:

privacy@magmafoundation.org

Any enquiries regarding this Privacy Policy or the processing of personal data should be directed to the above contact details.

3. APPLICABLE LAW

The Foundation processes personal data in accordance with:

- Mauritius Data Protection Act 2017;
- applicable laws of Mauritius;
- lawful requests issued by competent authorities;
- internationally recognised data protection principles, including transparency, fairness, purpose limitation, data minimisation, accuracy, storage limitation, integrity and confidentiality.

4. PERSONAL DATA WE COLLECT

Depending on the nature of our relationship with you, we may collect:

Identity Information

- full name
- date of birth
- nationality
- national identity or passport details
- photograph (where required)

Contact Information

- residential address
- email address
- telephone number
- postal address

Donation Information

- donation history
- payment confirmations
- preferred donation methods
- communication preferences

Beneficiary Information

Where applicable:

- application forms
- supporting documentation
- eligibility information
- information necessary to assess requests for assistance

Volunteer Information

- qualifications
- experience
- emergency contacts
- availability

Employment Information

Where applicable:

- recruitment records
- employment records
- payroll information
- performance records

Technical Information

When using our website:

- IP address
- browser type
- device information
- cookies
- website usage statistics

5. SPECIAL CATEGORY PERSONAL DATA

Where necessary and permitted by law, the Foundation may process special categories of personal data, including information relating to:

- health;
- disabilities;
- social circumstances;
- other sensitive information required to assess eligibility for charitable programmes.

Such information is processed only where necessary, proportionate and authorised by law.

6. HOW WE COLLECT PERSONAL DATA

Personal data may be collected:

- directly from you;
- through application forms;
- during donations;
- through correspondence;
- during events;
- through our website;
- from publicly available sources;
- from professional advisers;
- from third parties authorised to provide information on your behalf.

7. PURPOSES OF PROCESSING

The Foundation processes personal data only for legitimate purposes including:

- administering donations;
- managing charitable programmes;
- assessing grant or assistance applications;
- communicating with donors and beneficiaries;
- organising events;
- administering volunteers;
- managing employment relationships;
- complying with legal and regulatory obligations;
- maintaining financial and accounting records;

- preventing fraud;
- protecting the security of our systems;
- defending legal claims;
- improving our services.

Where required by law, consent will be obtained before processing personal data.

8. LAWFUL BASIS FOR PROCESSING

The Foundation processes personal data on one or more of the following legal bases:

- consent;
- performance of a contract;
- compliance with legal obligations;
- protection of vital interests;
- performance of tasks carried out in the public interest;
- legitimate interests pursued by the Foundation, provided such interests are not overridden by the rights and freedoms of the individual.

9. DISCLOSURE OF PERSONAL DATA

Personal data may be shared only where necessary with:

- auditors;
- accountants;
- legal advisers;
- banks and payment service providers;
- cloud service providers;
- IT service providers;
- government authorities;
- regulators;
- law enforcement agencies;
- courts;
- other parties where disclosure is required by law.

The Foundation does not sell personal data.

10. INTERNATIONAL TRANSFERS

Where necessary, personal data may be transferred outside Mauritius, including where cloud-based service providers or international partners are used.

Where such transfers occur, the Foundation will implement appropriate safeguards to ensure that personal data continues to receive an adequate level of protection in accordance with applicable law.

11. DATA RETENTION

This Data Retention applies to:

- all employees;
- Council members;
- volunteers;
- beneficiaries
- consultants;
- contractors;
- third-party service providers processing information on behalf of the Foundation.

It covers both paper and electronic records.

RETENTION PRINCIPLES

The Foundation shall ensure that records are:

- retained only for legitimate business or legal purposes;
- accurate and complete;
- protected against unauthorised access;
- securely disposed of once retention periods expire;
- retained longer where litigation, regulatory investigations or legal claims require preservation.

RECORD RETENTION SCHEDULE

Record Category	Minimum Retention
Governing documents (Constitution, Charter, By-laws)	Permanent
Council minutes and resolutions	Permanent
Annual reports	Permanent
Statutory registers	Permanent
Financial statements	7 years
Accounting records	7 years
Bank statements	7 years
Donation records	7 years after the last donation
Donor correspondence	7 years
Grant applications (approved and rejected)	7 years
Beneficiary files	7 years after programme completion
Project documentation	7 years after project completion
Volunteer records	5 years after engagement ends
Recruitment records	2 years after recruitment closes
Employment records	Duration of employment plus 7 years (or longer if required)

	by law)
Supplier contracts	7 years after termination
Procurement records	7 years
Insurance documents	7 years after expiry
Complaints	7 years after closure
Website logs	Up to 12 months
CCTV recordings (if applicable)	Normally up to 90 days unless required for investigation
Incident reports	7 years
Data breach records	7 years after closure
Audit reports	Permanent
Legal opinions	Permanent unless superseded
Litigation files	7 years after final conclusion or longer if advised by legal counsel

LEGAL HOLD

Where litigation, regulatory enquiries, audits or investigations are pending or reasonably anticipated, the Foundation shall suspend the routine destruction of relevant records until the matter has been concluded.

SECURE STORAGE

Records shall be stored using appropriate administrative, physical and technical safeguards, including:

- access controls;
- password protection;
- encryption where appropriate;
- secure cloud storage;
- secure filing cabinets for physical records;
- backup and disaster recovery procedures.

DISPOSAL OF RECORDS

When records reach the end of their retention period, they shall be securely destroyed in a manner appropriate to the sensitivity of the information.

Acceptable disposal methods include:

Paper records

- cross-cut shredding;
- secure confidential waste disposal;
- certified destruction services.

Electronic records

- permanent deletion from production systems;
- deletion from portable devices;
- secure erasure from storage media;
- destruction of physical media where necessary.

Where technically feasible, personal data may be anonymised instead of deleted where this supports statistical or historical purposes.

RESPONSIBILITIES

The Council of Members is responsible for oversight of this Policy.

Management shall ensure that retention schedules are implemented.

Individuals handling Foundation records are responsible for complying with this Policy and reporting any concerns relating to record retention or disposal.

Where data is no longer required, it will be securely deleted or anonymised.

12. DATA SECURITY

The Foundation implements appropriate technical and organisational measures to protect personal data against accidental or unlawful destruction, loss, alteration, unauthorised disclosure or access.

Security measures include:

- encryption where appropriate;
- access controls;
- password protection;
- multi-factor authentication where appropriate;
- secure backups;
- monitoring and logging;
- staff confidentiality obligations;
- periodic security reviews.

13. PERSONAL DATA BREACHES

The Foundation maintains procedures for identifying, investigating, documenting and responding to personal data breaches.

Where required by applicable law, the Foundation will notify the Mauritius Data Protection Office and affected individuals within the prescribed legal timeframes.

14. YOUR RIGHTS

Subject to applicable law, individuals have the right to:

- request access to their personal data;
- request correction of inaccurate data;
- request deletion of personal data where appropriate;
- request restriction of processing;
- object to certain processing activities;
- withdraw consent where processing is based on consent;
- request data portability where applicable;
- lodge a complaint with the Mauritius Data Protection Office.

Requests should be submitted using the contact details provided in this Policy.

15. COOKIES WE USE

The Foundation may use the following categories of cookies.

A. Strictly Necessary Cookies

These cookies are essential for the operation of the website and cannot normally be disabled.

Examples include:

- session management;
- website security;
- load balancing;
- user authentication (where applicable).

Legal basis: Legitimate interests.

B. Functional Cookies

These cookies remember your preferences, such as:

- language selection;
- accessibility settings;
- saved preferences.

These cookies improve website usability.

Legal basis: Consent where required by applicable law.

C. Analytics Cookies

These cookies help us understand how visitors use our website by collecting anonymous statistical information.

Examples include:

- pages visited;
- time spent on pages;
- referring websites;
- browser type;
- device type.

Where analytics tools are used (such as Google Analytics or similar services), they will be configured to minimise the collection of personally identifiable information wherever possible.

Legal basis: Consent where required.

D. Third-Party Cookies

The Foundation's website may include content provided by third parties, including:

- embedded videos;
- maps;
- donation platforms;
- social media links.

These providers may place cookies in accordance with their own privacy policies.

The Foundation does not control these cookies.

COOKIE CONSENT

When you first visit our website, you will be presented with a Cookie Banner enabling you to:

- Accept all cookies;
- Reject non-essential cookies; or
- Manage cookie preferences.

No non-essential cookies will be placed on your device before the appropriate consent has been obtained, where required by applicable law.

You may change your preferences at any time using the cookie settings available on our website.

MANAGING COOKIES

Most web browsers allow users to:

- delete cookies;
- block cookies;
- receive notifications before cookies are stored.

Please note that disabling certain cookies may affect website functionality.

RETENTION OF COOKIE DATA

Cookie retention periods vary depending on their purpose. Session cookies are deleted when the browser is closed. Persistent cookies remain until they expire or are manually deleted. Analytics information is retained only for as long as reasonably necessary to analyse website performance.

CHANGES TO THIS NOTICE

The Foundation may update this Cookie Notice

16. CHILDREN'S PERSONAL DATA

Where the Foundation provides programmes involving children or receives personal data relating to minors, such information will be processed only where permitted by law and with appropriate safeguards, including, where applicable, the consent of a parent or legal guardian.

17. THIRD-PARTY WEBSITES

Our website may contain links to third-party websites.

The Foundation is not responsible for the privacy practices or content of external websites. Users are encouraged to review the privacy policies of those websites before providing personal data.

18. CHANGES TO THIS POLICY

The Foundation may amend this Privacy Policy from time to time to reflect changes in legislation, regulatory guidance or operational practices.

The latest version will always be published on the Foundation's website and will indicate the effective date.

19. CONTACT US

For any questions regarding this Privacy Policy or the processing of your personal data, please contact:

MAGMA Foundation Rue de L'Institut 4th Floor, Ebene Skies Ebene Mauritius

Email: **privacy@magmafoundation.org**