

# Privacy Policy

**Effective Date:** 1 July 2025  
**Last Updated:** 1 July 2025

Welcome to **The Million Dollar Force (TMDF)**, a faith-driven platform mobilizing a global force of believers committed to the Gospel through monthly giving and workplace evangelism.

This Privacy Policy explains how we collect, use, disclose, and protect your personal information in accordance with the **General Data Protection Regulation (GDPR)** and other applicable data protection laws.

## 1. Who We Are

**TMDF** is operated by [Insert legal entity name], with its registered office at [Insert address]. We are the Data Controller of your personal data as defined under the GDPR.

For questions or concerns, please contact our **Data Protection Officer (DPO)** at:

 [privacy@tmdfnetwork.org](mailto:privacy@tmdfnetwork.org)

## 2. The Data We Collect

We collect and process the following categories of personal data:

Data Category	Examples
Identity Data	Full name, username, title, date of birth
Contact Data	Email address, phone number, mailing address
Financial Data	Payment card details (processed securely via third-party gateways), donation history
Technical Data	IP address, browser type, device ID, operating system
Usage Data	Logins, activity on dashboard, email interactions
Mission Engagement Data	Subscription preferences, workplace mission activity, one-off donations

<b>Communications</b>	Feedback, inquiries, prayer requests, support requests
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We do **not** collect or process **sensitive personal data** unless explicitly provided by you for mission engagement or prayer support.

### 3. How We Use Your Data

We use your data to:

- Process your monthly or one-time donations securely
- Maintain your Force Member account
- Send you essential notifications and reports (e.g., fund performance, Taking Territories report)
- Personalize your experience within the TMDF platform
- Respond to inquiries and provide support
- Fulfill our legal and regulatory obligations
- Improve our services and communication strategies

#### Legal Basis for Processing:

- **Consent** (Art. 6.1(a) GDPR) – when you sign up or opt into communications
- **Contractual necessity** (Art. 6.1(b)) – to provide you services you requested
- **Legal obligation** (Art. 6.1(c)) – for tax reporting or compliance
- **Legitimate interest** (Art. 6.1(f)) – to improve TMDF services, prevent fraud, or defend our mission

### 4. Sharing Your Data

We **do not** sell your personal data.

We may share your data with:

- **Service providers:** Payment processors, email delivery services, and hosting platforms under strict data processing agreements

- **Legal authorities:** When required by law or to defend TMDF's rights
- **Mission affiliates:** Limited non-personal data for impact reporting and strategic collaboration

All third-party processors are GDPR-compliant and only process your data on our documented instructions.

## 5. International Data Transfers

TMDF operates globally. Where we transfer your personal data outside the European Economic Area (EEA), we ensure such transfers are compliant through:

- The use of **Standard Contractual Clauses (SCCs)**
- Transfers to countries deemed to provide adequate protection by the EU Commission
- Additional safeguards such as data encryption and pseudonymization

## 6. Data Retention

We retain your personal data only as long as necessary for:

- The purpose it was collected
- Compliance with legal, tax, or accounting obligations
- Our legitimate mission reporting and engagement

After this period, data is securely deleted or anonymized.

## 7. Your Rights Under GDPR

As a data subject, you have the following rights:

- **Right to access** – Know what data we hold about you
- **Right to rectification** – Correct incomplete or inaccurate data
- **Right to erasure** – Request deletion of your personal data
- **Right to restrict processing** – Limit how we use your data
- **Right to data portability** – Request transfer of your data to you or another service

- **Right to object** – To processing based on legitimate interests
- **Right to withdraw consent** – At any time, for communications or specific data uses
- **Right to lodge a complaint** – With your local data protection authority

To exercise any of these rights, email: [privacy@tmdfnetwork.org](mailto:privacy@tmdfnetwork.org)

## **8. Data Security**

We apply military-grade discipline to your data security:

- SSL encryption for data in transit
- AES-256 encryption for sensitive stored data
- Role-based access control within our systems
- Continuous monitoring and auditing for breach detection
- Periodic data protection impact assessments

Despite our best efforts, no system is impenetrable. We commit to notifying you and regulators of any significant breach within 72 hours as required by law.

## **9. Children's Privacy**

TMDF is not intended for children under the age of 16. We do not knowingly collect data from minors without parental consent. If you believe a child has provided us data, please contact us for immediate action.

## **10. Updates to This Policy**


This Privacy Policy may be updated from time to time to reflect legal changes or improvements in how we protect your data.

We'll notify you of material changes through your dashboard or by email.

## **11. Contact Us**

For any concerns, please reach out to our Command Base:

 Email: [privacy@tmdfnetwork.org](mailto:privacy@tmdfnetwork.org)

 Phone: +234 906 373 2319

 Address: NPM Secretariat, 7<sup>th</sup> Floor, CBC Towers, 10 Olubunmi Owa Street, Lekki, Lagos

**Stand firm, Soldier. Your data is in secure hands.**

**– TMDF Command Base**