



## YOUNG ENTERPRISE PRIVACY POLICY

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PLEASE READ THIS PRIVACY POLICY CAREFULLY BEFORE USING THE [WWW.YOUNG-ENTERPRISE.ORG.UK](http://WWW.YOUNG-ENTERPRISE.ORG.UK) WEBSITE OR OTHER WEBSITES OWNED AND RUN BY YOUNG ENTERPRISE, PARTICIPATING IN OUR YOUNG ENTERPRISE PROGRAMMES OR CHALLENGES OR DOWNLOADING ANY YOUNG ENTERPRISE RESOURCES

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### 1. Overview

Young Enterprise is the UK's leading Enterprise and Financial Education Charity. We empower young people to discover, develop and celebrate their skills and potential. Every young person has the opportunity to learn the vital skills and enterprising mindset needed to earn and look after their money and make a positive contribution to their community.

If you are browsing or logging on to <https://www.young-enterprise.org.uk/>, <https://www.10xchallenge.org.uk/en/>, <https://e-learning.y-e.org.uk/>, <https://ye-learningzone.org.uk/>, <https://www.fiverchallenge.org.uk/>, <https://www.company-connect.org.uk/> and any other websites owned by Young Enterprise (our "**Websites**"), you request us to provide you with any of our materials or access to them (our "**Resources**") or participate in any way in any Young Enterprise activities, projects, programmes, services, campaigns, events challenges or networks (our "**Activities**") including by submitting hard copy entry forms, or participating in our online programmes and services including at, or then this privacy policy (the "**Policy**") applies to you. It also applies to anybody else we interact with and collect information about including volunteers and alumni (including through) donors, funders, business partners, service providers, representatives of trusts & foundations and members of any parliamentary groups which we support. Note that there is a separate privacy policy in relation to the YE Trading Station, available at <https://www.ye-tradingstation.org.uk/privacy>.

The Websites are provided by Young Enterprise. If we refer to "**we**", "**us**" or "**our**" in this policy, we mean Young Enterprise. There is more information about us at section 0 (at the bottom of this Policy).

Please read this Policy carefully as it explains how we collect and use information about you and any young people you work with in relation to our Activities ("**personal information**"), what we do

with that personal information, who we share it with (and why), where it may be processed and the choices we provide to allow people to control, access and update that personal information.

We also have a separate Cookies Policy which explains how and why we use cookies on our Websites. Our Cookies Policy can be found on our websites and Cookies (what they are and how they are used by us and others to collect personal information about you) is in section 10 of this Policy.

## **2. What information do we collect about you and how is it collected?**

When you use our Websites, or you participate in any of our Activities, you are in control of how much personal information you choose to give us about yourself and others. There are two ways that we collect personal information: Directly collected information, which is information you have submitted to us yourself and indirectly collected information, which is information that you do not provide to us but which we have collected by other means.

The information that you might provide to us could include, for example, your name, email address, telephone number, name of the school or college you are associated with, your address, Job title, position and, if you are a YE Alumni, what programme you've completed and in what decade.

**Information provided to us:** You may, for example, provide personal information to us about yourself when you:

- register your details and/or register the young people you work with to participate in our Activities, receive updates or newsletter from us or use our Websites;
- register your details to become part of our YE Alumni network.
- register to become a YE volunteer
- make a donation to YE;
- report a problem with our Websites or Activities or ask a question in respect of our Activities;
- enter any of our competitions;
- share information via our Websites or social media functions (such as your social media profiles);
- contact us (for example, by telephone or email);
- give us feedback; or
- complete a survey.

You may choose whether or not to give some information to us. However, not providing certain information may mean you cannot enjoy all or parts of our Websites and may affect your participation in our Activities or that of the young people you work with.

**Information that is automatically collected:** When you use our Websites, we automatically record information about your visit from your web browser or the device you are using to access the Websites (such as your phone, laptop or home computer). The information that might be automatically collected in this way includes:

- the IP address of your device, device information such as whether it is a phone or laptop, the unique device identifier (which is a specific number that your devices will have) and the software your device is using;
- how you use our Websites such as what pages you look at and how long you are on a Website page;

- website traffic data;
- cookie information (as explained in our Cookies Policy); and
- location information (e.g. what country or city you are in when you access our Websites, but this information is only seen by us if your device settings allow this).

Some of this information may be collected using cookies and similar tracking technology, as explained further at section 10 of this Policy.

**Information from others:** We also collect some information from other organisations and public sources. For example:

- where you are a member of staff or volunteer who will work with children and other young people, we will request that an enhanced check is performed by the Disclosure & Barring Service.
- we will use public sources such as LinkedIn to assess whether a person or the organisation they work for may be interested in becoming involved in YE or making a donation to YE which may include individuals, companies, trusts and foundations who share the same charitable objectives as YE.

### **3. How do we use the personal information we collect?**

The personal information you provide to us (directly and indirectly as explained at section 2 of this Policy) and which we hold about you is used for the following reasons:

- **To carry out our commitments to you**, including:
  - operating and administering your participation or other involvement in our Activities;
  - providing you with our Websites and Resources;
  - processing your request to receive news and updates from us, download our Resources or your application for you and the young people you work with to participate in our Activities;
- **To tell you** about our Activities, our Resources and any changes or updates to our Activities or to our Resources;
- **To promote Young Enterprise and our Activities** and any other of our products, services programmes or events which we think you may be interested in, but we will only do this if you have given us your permission to contact you for these reasons or if the law allows us to do so;
- **To answer your questions about our Activities and our Websites**
- **To improve the products, Activities which we can offer to you (and others);**
- **To deal with and respond to any complaints, questions or feedback** which you (and others) provide about our Activities and our Websites;
- **To improve the operation of the Websites** (such as how it looks, how well it works and what information you see on the Websites);

- **To conduct surveys and to obtain your feedback** on our Activities, Resources, Websites and other questions or issues which are relevant to Young Enterprise;
- **Where any of our Activities in which you participate are funded by another organisation**, to provide updates and reports on those Activities to our funders.
- **To work with you** where you are a volunteer, business partner, service provider, trust or foundation (including communicating with you and managing our relationship with you).
- **Where you make a donation to YE**, to process your donation including Gift Aid.
- **To make our Websites work well when you access it from different devices** such as your phone or laptop.
- **To prevent, monitor and take action in respect of any suspected or reported fraudulent or illegal activity**
- **To operate our charity in accordance with the laws and regulations which apply to us** which includes our safeguarding duties to the children and young people that we work with and ensuring that our staff and volunteers who work with young people are appropriate to serve this role for YE.
- **To report any incidents or claims to our insurers**

We may also use information that you have provided, or that has automatically been collected from you in an anonymised way. This means that we cannot link the information to you or the young people you work with and have no way of knowing who the information is about. We use anonymised information for these reasons:

- **For analysis, research and statistical purposes** to help us understand who is participating in our Activities and to provide reports and updates to the funders of our Activities at an aggregated level), using the Websites and when and how they are used. For example, the type of anonymised information we might use includes:
  - the number of participants/teams from the same organisation, in the same region and age-groups of participants
- **To maintain, protect and improve** the Websites and our Activities by, for example:
  - Presenting information to our leadership team about our Activities and the people and organisations that take part in them and who use our Resources;
  - Promoting communications about our Websites and our Activities within YE and externally to the organisation (but we will not provide personal information to third parties so that they may promote their products and services to you, unless you have provided your permission for us to do this);
  - Lobbying to inform the government and funding bodies of demand for our Resources and Activities to try to get more support; and
  - To understand the education and work goals and achievements of the people using our Resources and taking part in our Activities.

#### 4. Legal basis for processing personal information

We will normally collect personal information about you only where:

- we have the relevant person's permission (or that of their parent or guardian);
- we need the personal information to perform a contract with the relevant person, or;
- it is in our legitimate interests and not overridden by the data protection interests or fundamental rights and freedoms of the relevant person.

If we ask you to provide personal information that is needed by law or to perform a contract, we will tell you at the time and tell you whether you are able to proceed without providing personal information.

Where we collect and use personal information on the basis of our legitimate interests (or those of any other group), our legitimate interests include the activities in section 3 above. If we process personal information for any other legitimate interests, we will tell you at the time what those legitimate interests are.

If you have questions about or need more information about the legal basis on which we collect and use personal information, please contact us using the contact details provided at section 0 below.

#### 5. Who do we share personal information with?

We may share personal information with the following people and organisations:

- **Companies in our Group**, including Young Enterprise Scotland (for further details, please visit: <http://www.yes.org.uk/>), Young Enterprise Northern Ireland (for further details, please visit: <http://www.yeni.co.uk/>) and Young Enterprise Gibraltar whose details can be found on our website;
- **Our partners**, being those companies that we engage to provide services for us in respect of the Websites, Services and our Activities which are:
  - OWA Digital Ltd, who support, maintain and host the Young Enterprise Website and other programme websites;
  - Marked Improvement E-learning Ltd. who provide support, maintenance and hosting of our programme websites;
  - Walkgrove Ltd. Who provide support, maintenance and hosting for our online teacher training;
  - MailChimp (operated by The Rocket Science Group LLC), who provide mailing services to us so that we can send e-mail communications to you about our Activities;
  - SmartSurvey Ltd. who provide us with online survey services in respect of our Activities;
  - Prolog Fulfillment Ltd. and EC Group who provide us with fulfilment and distribution services for our hard copy programme resources and materials.

- Eventbrite Inc. who provide us with online event management services e.g. registration forms for our Activities.
- London JotForm Ltd. who provide us with online survey and online document management services in respect of our Activities.
- **Our funders**, being any organisation which provides funding for our Activities and our Resources
- **The police, local authorities, Her Majesty's Revenue and Customs (HMRC), the courts and any other government authority** where we believe the sharing of your information is necessary:
  - by law;
  - for us to exercise, establish or defend our legal rights; or
  - to protect a person's vital interests.
- **Our professional advisors** including our lawyers and accountants when they need it to give us their professional advice.
- **Our insurers** where it is necessary to disclose personal information in respect of a claim under our insurance.
- **The Disclosure and Barring Service** where for certain volunteering / employee roles you may be required to be checked at an Enhanced level by the Disclosure & Barring Service.
- **In the event that we merge our organisation with another or it is taken over by another organisation**, we will share your personal information with them.

Where we share personal information with these people and organisations, we will only do so for the purposes set out above and as specified in section 3.

## 6. International transfers of personal information

Personal information may be transferred to, and processed in, countries other than where the relevant person lives. Those countries may have data protection laws that are different to the laws of that person's country (and may not be as protective).

We process personal information in the United Kingdom and in some other EU countries such as the Republic of Ireland and some of our service providers will process personal information in the United States. Where your personal information is processed in the United States, (such as MailChimp), we have entered into the European Commission's 'standard contractual clauses' with the recipient.

## 7. How long do we keep personal information?

We retain personal information we collect from you where we have an ongoing organisational need to do so (for example, to provide you with a service you have requested or to comply with the law or tax or accounting requirements or to deal with any claim which you, we or somebody else may have in respect of personal information).

When we no longer have an organisational need to process personal information, we will either delete or anonymise it or, if this is not possible (for example, because the personal information has

been stored in backup archives), then we will securely store the personal information and make sure that it is not processed until we can delete it. We maintain a data retention and deletion policy and we will retain and delete your personal information in accordance with this policy.

## **8. Your rights**

You have the following data protection rights:

- If you wish to access, correct, update or request deletion of personal information, you can do so at any time by contacting us using the contact details at section 0 below. You may also be able to do this within your secure account. Please note that some information cannot be changed once you have entered it. This is to discourage users from engaging in unlawful activities. We may be unable to continue providing our Websites or Services or continue to allow you or the young people you work with to participate in our Activities if you delete certain pieces of personal information we hold– if you have any questions or concerns about this, please get in touch with us (our contact details are in section 11).
- You can also object to processing of personal information, ask us to restrict processing of personal information or request portability of personal information. Again, these rights can be exercised by contacting us using the contact details at section 0 below.
- You have the right to opt-out of marketing communications we send you at any time. You can exercise this right by clicking on the “unsubscribe” or “opt-out” link in the marketing e-mails we send you. To opt-out of other forms of marketing (such as postal marketing or telemarketing), then please contact us using the contact details at section 0 below.
- If we have collected and process personal information on the basis of consent, then that consent can be withdrawn at any time, but we may still be entitled to use the information on a different legal basis.
- You have the right to complain to a data protection authority about our collection and use of your personal information. For more information, please contact your local data protection authority. In the UK this will be the Information Commissioner’s Office (the “**ICO**”). The ICO makes a lot of information accessible to consumers on their website and they ensure that the registered details of all data controllers, such as Young Enterprise, are available publicly. You can access them at [www.ico.org.uk](http://www.ico.org.uk).

We answer all requests from people wanting to exercise their data protection rights in line with the requirements of data protection laws.

## **9. Updates to this Policy**

Over time we might change the personal information we collect, how we store it, who we share it with and how we use it.

We may need to update or change this Policy from time to time. We will try our best to tell you about any changes by posting on the Young Enterprise website [www.young-enterprise.org.uk](http://www.young-enterprise.org.uk) and will ask for your permission where the changes are important and where your permission (or that of the young people you work with) is required under data protection law. That way, you can check to see if you’re still happy.

## **10. Cookies**

We use cookies to help us to provide you with a good experience when you use our Websites and improve our Websites (for example, to remember you when you come back and visit our Website, if you want us to, and also to provide us with information about the performance of our Websites and the number of people who use our Websites, where they are located, when they access our Websites and how long they spend on our Websites). For more information on the cookies we use and the purposes for which we use them, see the Young Enterprise Cookie Policy and/or Pop Up which can be found on our websites.

## **11. Contact us**

Please contact us if you have any questions about information we hold about you or about this Policy:

- Send an email to [info@y-e.org.uk](mailto:info@y-e.org.uk)
- Write to us at FAO: Head of Programmes and Services, Young Enterprise, The Coram Campus 41 Brunswick Square London, WC1N 1AZ.

## **12. About us**

Young Enterprise is a charity incorporated in England and Wales as a company limited by guarantee, with company number 712260 and registered charity number 313697 and having its registered office at The Coram Campus 41 Brunswick Square London, WC1N 1AZ.

We are the 'data controller' for the personal information that we process in accordance with this Policy. This term is a legal phrase used to describe a person or entity that controls the way someone's personal information is used and processed. We are registered with the Information Commissioner's Office in the United Kingdom. Our registration number is Z6643877.