

## Momentum World Privacy Policy | Effective January 2020

### Our commitment to privacy

We are committed to providing a safe and private online and offline environment for the services we provide. For this reason we provide this notice explaining our online information practices, the way your information is collected and used, and your access to this information. We will only use the information that we collect about you lawfully, in accordance with the UK Data Protection Act 2018 (DPA) and the General Data Protection Regulation 2018 (GDPR).

Momentum World complies with its obligations under the GDPR by keeping personal data up to date, by storing and destroying it securely; by not collecting or retaining excessive amounts of data; by protecting personal data from loss, misuse, unauthorized access and disclosure and by ensuring that appropriate technical measures are in place to protect personal data.

To make this notice easy to find, we make it available on the home page of our websites. and at every point where personal information may be requested. In addition, our internal Data Protection policy is available on request.

### Who we are

In this privacy policy references to 'Momentum World', 'we', 'us' and 'our' are to Momentum World Community Interest Company. References to 'our websites' or 'the websites' are to [www.momentumworld.org](http://www.momentumworld.org), [www.momentumworld.org.uk](http://www.momentumworld.org.uk), [www.momentumworld.co.uk](http://www.momentumworld.co.uk), [www.europeers.uk](http://www.europeers.uk), [www.time4tea.info](http://www.time4tea.info), [www.solidarityuk.org](http://www.solidarityuk.org); references to "our work" or "our services" are to Momentum World's youth development programmes, Momentum international youth network, EuroPeers UK youth network and other projects and services described on the websites or in our printed materials.

Under the terms of the DPA and the GDPR, Momentum World CIC is classified as a 'Data Controller'. This means that we determine what personal information about you is collected and how it will be used.

### What data do we collect?

Momentum World collects the following data:

- Personal identification information (name, address, email, telephone number, nationality etc.)
- Occupation details (name and address of your school, university, or organization; your job title or role, etc.)
- Professional interests (topics or subject areas of interest to you)

In some cases (e.g. when you register as a participant on a project) we may also collect:

- Additional personal details (date of birth, gender, passport number etc.)
- Special category data (dietary or other personal requirements; disability information; medical information)
- Next of kin details

### How do we collect your data?

You directly provide Momentum World with most of the information we collect about you. We collect and process data when you:

- Register online or apply for any of our products or services, including newsletter subscriptions
- Voluntarily complete a customer survey or provide feedback via email or social media
- Use or view our websites
- Attend an event with us

Momentum World may also receive data indirectly from the following sources:

- Information in the public domain (e.g. from your organisation's website)
- Information which you have openly published on social media

## **How will we use your data?**

Momentum World collects information from you so that we can:

- communicate with you via email, telephone or ordinary post
- send you a welcome email when you register on our websites
- send you our newsletter or other information which you have subscribed to
- manage and monitor our international youth networks
- monitor equal opportunities.
- facilitate entry to Momentum World's programmes and projects, and monitor the progress of participants on these programmes and projects.
- identify suitably skilled or qualified professionals who may be interested in joining our teams in delivering training or other events, or working with us in other ways.
- identify potential partner organisations and communicate with actual partners.
- conduct project or other evaluation exercises, in order to report impact and improve the quality of our services.
- conduct occasional surveys, including market research, or collect anecdotal evidence relevant to our work.
- support any reasonable day to day operations of Momentum World.

Momentum World may also share your data with our partner organisations in order for them to provide you with a product or service. We will always ask for your consent before we do this.

We do not sell, rent, share, or otherwise disclose personally identifiable information with any other organisations or individuals without your permission. The only exception to this rule is as described in our Legal Disclaimer (see below).

We may share reports based on our evaluations or research with third parties. Such reports will never contain personally identifiable information. We do not allow other external organisations access to our mailing lists, or to send out information on our behalf.

If we wish to use your personal data for a new purpose not covered by your original consent, then prior to processing any data we will provide you relevant information and ask you to confirm your consent.

## **How do we store your data?**

Momentum World securely stores your data using the following proprietary services:

- Hubspot – our main database
- Eventbrite – used for promoting and managing events and registering participants
- Survey Monkey – for application and registration forms, evaluation and feedback, and general surveys
- Mail Chimp – for our newsletter mailing lists
- Ticket Tailor – for payments via our websites

These services may use remote servers based in countries outside of the European Economic Area (EEA) – this is generally the nature of data stored in “the Cloud”. We take reasonable measures to ensure that we use only services which are demonstrably compliant with GDPR, thus providing assurance that your data is kept secure and your privacy rights are not affected.

The length of time we keep your data depends on the type of service you have requested from us. No data are kept for longer than 6 years without an explicit reason (e.g. your continuing use of our services).

## What is the legal basis for using your personal data?

The GDPR sets out six legal justifications for the processing of personal data. One or more of the following three normally apply to our use of your data:

- Consent, meaning that you have requested a service from us and have opted in to receiving communications from us.
- Contract, meaning that there is a contractual obligation between us which requires the use of your data.
- Legitimate interest, meaning that we may reasonably use limited and appropriate personal data in pursuit of our general public relations, marketing and partnership building, and to manage relationships with our stakeholders.

## Protecting children and young people

Where we believe any of our services may attract children and young people under the age of 16, we will clearly provide information notices to try to deter children from providing their personal data without parent or guardian consent. We do not knowingly intend to send marketing communications to children and young people.

If you are a parent or guardian and are concerned that we may be processing personal data related to your child, please contact us (contact details below).

## Marketing

Momentum World would like to send you information about products and services which we think will interest you, such as international youth projects, training courses and events. As well as our own services, we may also send information about services provided by our UK or international partner organisations. However, we will never promote products or services which are not educational in nature or otherwise obviously relevant to the type of work we do.

If you have agreed to receive marketing information, you may always opt out at a later date.

You have the right at any time to stop us from contacting you for marketing purposes or giving your data to other organisations.

If you no longer wish to be contacted for marketing purposes, please contact us (contact details below).

## What are your data protection rights?

Momentum World would like to make sure you are fully aware of your data protection rights. Every individual is entitled to the following:

- Right to access: you have the right to request Momentum World to provide copies of any personal data we hold about you.
- Right to rectification: you have the right to request that Momentum World correct any information you believe is inaccurate. You also have the right to request us to complete any information which you believe is incomplete.
- Right to erasure: you have the right to request that Momentum World erase your personal data, under certain conditions.
- Right to restrict processing: you have the right to request us to restrict the processing of your personal data, under certain conditions.
- Right to object to processing: you have the right to object to Momentum World processing your data, under certain conditions.
- Right to data portability: you have the right to request us to transfer the data we have collected about you, to another organization, or directly to you, under certain conditions.

If you make a request, we are obliged to respond to you within one month.

## **What are cookies and how do we use them?**

Cookies are small data files sent to your internet browser, which are stored on your computer's hard drive, or your mobile device, and subsequently retrieved if you visit the website again. These cookies enable a website to recognise you and any preferred technical settings you have made, and thus to operate more efficiently and provide you with a better experience on any return visit. When you visit our websites, we may collect information from you automatically through cookies or similar technology.

Momentum World may use cookies in a variety of ways to improve your experience on our websites, including keeping you signed in, understanding how you use the sites, and giving you access to international opportunities which we advertise.

There are a number of different types of cookies. Our websites most typically use third-party cookies:

Functionality – cookies to enable us to recognize you on our websites and remember your previously selected preferences. These could include what language you prefer and where you are located.

Analytics and advertising – cookies which collect information about your visit to our websites, the content you viewed, the links you followed and information about your browser, device and IP address.

You can set your Internet browser to reject cookies: however, if you do so, some functions of our websites may not work properly.

For further information, visit [www.allaboutcookies.org](http://www.allaboutcookies.org)

## **Privacy policies of other websites**

Our websites may contain links to other websites including sites owned and managed by third parties and therefore not controlled by us, and whose policies may be different from ours. Our privacy policy only applies to our own websites as listed above. Therefore we advise that if you click on a link to an external website, you should read their privacy policy.

## **Changes to our privacy policy**

We keep this privacy policy under regular review and updated versions are posted to our website home page. In the case of major substantive changes, we may also publish a newsflash on our websites.

## **Legal Disclaimer**

Your personal data will not normally be disclosed to any third party, government institution or other authority. However, we reserve the right to disclose all or any information collected through our website or other means, including your personally identifiable information, if so required by law or in exceptional circumstances such that we consider it necessary in order to protect someone from suffering serious harm or injury, or when we believe that disclosure is necessary to protect our rights: in which case we may pass on your data to an appropriate and responsible authority.

## **How to contact us**

If you have any comments or queries about our privacy policy, the security of our websites, or other aspects of our collection or use of data, please contact us:

Email: [dataprotection@momentumworld.org](mailto:dataprotection@momentumworld.org)

Post: Company Secretary, Momentum World CIC, 15 Prescott Place, London SW4 6BS, UK.

## **How to contact the appropriate authority**

If you wish to report a complaint or if you feel that Momentum World has not addressed your concern in a satisfactory manner, you may contact the Information Commissioner's Office.

Web: <https://ico.org.uk/concerns/> or <https://ico.org.uk/global/contact-us/>

Tel: +44 (0) 303 123 1113