



## **YOUNG ENTERPRISE GIBRALTAR PRIVACY POLICY**

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**PLEASE READ THIS PRIVACY POLICY CAREFULLY BEFORE USING THE  
WWW.YOUNGENTERPRISEGIBRALTAR.COM WEBSITE, PARTICIPATING IN OUR YOUNG  
ENTERPRISE CHALLENGES OR DOWNLOADING ANY YOUNG ENTERPRISE  
RESOURCES**

**VERSION & DATE: [VERSION 30 MAY 2019]**

### **1. Overview**

Young Enterprise is Gibraltar's leading Enterprise and Financial Education Charity. We motivate young people to succeed in the changing world of work by equipping them with the work skills, knowledge, financial capability, entrepreneurial outlook and confidence they need for sustainable employability in the 21st Century.

If you are browsing or logging on to <https://www.youngenterprise Gibraltar.com/> (our "Website"), 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, campaigns, events challenges or networks (our "Activities") including by submitting hard copy entry forms then this privacy policy (the "Policy") applies to you. It also applies to anybody else we interact with and collect information about including volunteers, alumni, donors, funders, business partners, service providers, representatives of trusts & foundations and members of any parliamentary groups which we support.

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 Website. Our Cookies Policy can be found [here](#) 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 Website, 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 Website;
  - 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 Website or Services or ask a question in respect of our Activities;
  - enter any of our competitions;
- share information via our Website 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 Website 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 Website, we automatically record information about your visit from your web browser or the device you are using to access the Website (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 Website 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 Website, 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 Royal Gibraltar Police.
- 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:**
  - o operating and administering your participation or other involvement in our Activities;
  - o providing you with our Website and Resources;
  - o 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 Services and Activities;
- To tell you about our Activities, our Services and any changes or updates to our Activities or to our Services;
- 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 Website**
- **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 Website;
- To improve the operation of the Website (such as how it looks, how well it works and what information you see on the Website);
- To conduct surveys and to obtain your feedback on our Activities, Website 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.
- **To make our Website 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 Website and Services and when and how they are used. For example, the type of anonymised information we might use includes:
  - o the number of participants/teams from the same organisation, in the same region and age-groups of participants
  - To maintain, protect and improve the Website and our Activities by, for example:
    - o Presenting information to our leadership team about our Activities and the people and organisations that take part in them and who use our Resources;
    - o Promoting communications about our Website 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);

- o Lobbying to inform the government and funding bodies of demand for our Resources and Activities to try to get more support; and
- o 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 11 below.

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

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

- Our funders, being any organisation which provides funding for our Activities and our Resources
- **The police, Government Authorities, Her Majesty's Customs (Gibraltar) (HMCG) and the courts where we believe the sharing of your information is necessary:**
  - o by law;
  - o for us to exercise, establish or defend our legal rights; or
  - o 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.
- In the event that we sell or buy our business, in which case we will share personal information with the seller or buyer of the business or property.
- 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. We may need to do this if it is necessary to share your information with our own service providers if they are located outside of the European Economic Area (EEA) or if you are based outside of the EEA or where there may be an international dimension to the services or Activities we are providing. Those countries may have data protection laws that are different to the laws of that person's country (and may not be as protective).

Transfers of personal information outside of the EEA, are subject to special rules under European and Gibraltar data protection laws.. We will however ensure that such transfers comply with data protection law and that all personal information will be as secure as it would be inside the EEA. To do this, our standard practice will be to use standard data protection contract clauses that have been approved by the European Commission or if the transfer is to the USA, that it complies with the EU-US Privacy Shield.

- Our website [www.youngenterprise Gibraltar.com](http://www.youngenterprise Gibraltar.com) is hosted by Wix. When you voluntarily register as a member on our website, the information provided may be stored and processed in the USA, Europe, Israel, or other jurisdictions, whether by Wix or with the help of their affiliates and service providers.

Wix's data storage providers are contractually committed to protect and secure your data. Wix adheres to the EU – US & to the Swiss-US Privacy Shield Principles, for further protecting and enhancing users' privacy. For Wix's full Privacy Policy click [here](#).

- Any sensitive and/or non-sensitive data provided by you while visiting our website or participating in any Young Enterprise Gibraltar challenges may be stored on Google Drive. For Google's full Privacy Policy click [here](#).

If you would like further information about this please contact us.

## **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.

## **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 11 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 Website 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 11 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 11 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, which in Gibraltar is the Gibraltar Regulatory Authority (GRA) who may be contacted at [info@gra.gi](mailto:info@gra.gi) or telephone: 200 74636.

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 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 Website and improve our Website (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 Website and the number of people who use our Website, where they are located, when they access our Website and how long they spend on our Website). For more information on the cookies we use and the purposes for which we use them, see the Young Enterprise Cookie Policy which can be found [here](#).

## **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 [admin@youngenterprise Gibraltar.com](mailto:admin@youngenterprise Gibraltar.com)
- Write to us at Young Enterprise, suite 3, 209 Main Street, Gibraltar