

# Be Collective Europe

## Privacy Notice

*be collective*<sup>®</sup>

[becollective.com](http://becollective.com)

## PRIVACY NOTICE – JULY 2019

### OUR PRIVACY NOTICE

#### Our Protection Statement

Be Collective is committed to protecting the personal data shared when you apply to work for us, promote volunteer positions, make resources available, volunteer or, as a sponsor organisation, register to encourage your employees to volunteer through our platform, donate through our platform, communicate through the platform, buy our services, or if you visit our platform for information about or to learn more about what we do.

We will comply in our handling of your personal data with all applicable legal requirements, Including the Data Protection Act 2018 and the European General Data Protection Regulation (Data Protection Law).

This Privacy Notice sets out how Be Collective ('we' or 'us') will collect, use, disclose and keep secure your personal data. It also covers how Be Collective makes the personal data it holds available to you for access and correction by you in the event that such information is inaccurate or incomplete.

#### Data controller

For the purpose of the Data Protection Law, the controller is Be Collective Europe Limited whose principal place of business is Tintagel House, 92 Albert Embankment, London SE1 7TY.

#### Contacting Be Collective – Complaints and queries

If you require further information regarding Be Collective's Privacy Notice, our treatment or handling of your personal data or if you want to make a complaint or raise a query, you can contact our Privacy Officer by post at the address set out above (please mark your envelope "For the attention of the Privacy Officer") or by email at [hello@becollective.com](mailto:hello@becollective.com) (please state "For the attention of the Privacy Officer" in the subject line).

You have the right to lodge a complaint with a supervisory authority. In the United Kingdom, the supervisory authority is the Office of the Information Commissioner, full contact details for which can be found at <https://ico.org.uk/global/contact-us/>.

#### What personal data we might collect

Note that when we refer to personal data, we mean personal data as defined by Data Protection Law.

The personal data that we collect will typically include your name, address, email address, telephone number, date of birth, job title and details of your education and career, why you are interested in volunteering, and other information relating to you personally which you may choose to provide.

Data Protection Law recognises that certain types of personal data are more sensitive than others. These types are known as 'sensitive' or 'special category' personal data and include information revealing racial or ethnic origin, religious or philosophical beliefs and political opinions, trade union membership, genetic or biometric data, information concerning health or data concerning a person's sex life or sexual orientation. We will only process special category data where you have given your explicit consent to the processing of such data for one or more of the purposes specified in this Privacy Notice.

You do not have to provide your personal data if you do not want to. However, if you choose not to do so, you may not be able to take full advantage of the Be Collective service, as some personal data is required in order to match volunteers with suitable volunteering opportunities.

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### Eligibility

All Be Collective users must be aged 16 years and over.

### How and when we collect personal data about you

#### When you directly give us information

We may collect and store personal data about you when you interact with us through Be Collective and provide your personal data directly to us. For example, this could be when you:

- register as a volunteer, volunteer organisation or sponsor organisation;
- apply for a volunteering opportunity;
- post a volunteering opportunity;
- manage your volunteering program;
- post resources which you make available to volunteers;
- give us feedback;
- make a complaint;
- use one of our services; and/or
- apply for a job.

When you are utilising Be Collective (for example applying for a volunteer position) you will be warned that you are sending personal data to a third party organisation and you may be required to confirm your consent to that information being forwarded using our platform.

You may also provide or disclose personal data about yourself or someone other than yourself when you use our chat room and messaging functions. This is personal data you volunteer and, in relation to other people, you must ensure that you have the relevant individual's consent to provide such information to us.

#### When you indirectly give us information

When you interact with us on social media platforms such as Facebook, WhatsApp, Twitter or LinkedIn we may also obtain some personal data about you. The information we receive will depend on the privacy preferences you have set on each platform and the privacy policies of each platform. To change your settings on these platforms, please refer to the privacy notices of the social media provider you are using.

We may obtain information about your visit to our platform, for example the pages you visit and how you navigate the site, by using cookies (see below).

### Purposes for which we may process your personal data

We will only use your personal data for one or more of the following purposes:

- **To enable you to use the Be Collective platform:** Using our platform is why you have signed up and the primary purpose for which we will process your personal data. This includes making available the details you are required to provide through the registration process for making applications for volunteer positions or advertising volunteer positions, signing up as a sponsor organisation (an administrator will need to provide contact details as part of that registration), updating the "Social Record" about yourself on the Be Collective platform and providing feedback on volunteers [or volunteer organisations]. It includes using your personal data to match you with

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potential volunteer positions. This will help you to select volunteer positions in a more focused and efficient way.

- **To help you to connect with other Be Collective users:** We may pass on personal data that you provide when you interact with us by using our platform or with other users or sponsor organisations through the chat rooms, messaging functions or via social media platforms. This use of your personal data will usually be something you do on your own account, for example, by applying for a volunteer position rather than Be Collective using your information. This use of your personal data is therefore largely under your own control.
- **To report contraventions of law:** Under our General Terms we reserve the right to report any breach of the terms and conditions applicable to use of our platform which involves a breach of law to the appropriate authorities including the police and any other regulatory authority.
- **To respond to requests from you:** If you contact us with a query, we may use your personal data to provide you with a response.
- **To verify your identity:** We will need to use your personal data in order to verify your identity and to assist you if you have forgotten any user name or password.
- **To monitor and evaluate usage of the platform:** We may use your personal data in order to improve current and future performance of the platform.
- **To process job applications:** We may process your personal data if you send or fill in an application form or send us your CV or details in respect of an opportunity to work with us in order to evaluate your suitability and respond to you.
- **To perform our obligations with regard to performance of our contract with you:** We will need to use your personal data in order to carry out our obligations arising from any contracts entered into between you and us for goods or services.
- **To manage our records:** We may use your personal data in order to record and deal with any complaint you may have, record a request not to receive further notifications, record what our volunteers have done for us, update you about changes to our platform or terms and conditions and for other essential internal record keeping purposes.
- **To communicate with you:** We may use your personal data in order to communicate with you. However, we will only send you information by email, SMS, or phone if you have given us specific consent. If you withdraw your consent and then subsequently opt in to receive information again, then your most recent preference may supersede.
- **To protect your vital interests:** We may process your personal data in order to protect your interests where we reasonably think that there is a risk of serious harm or abuse to you or someone else or where there is a possible breach of law (including a data breach that is notifiable under Data Protection Law), in which case we may need to contact you to notify you of any breach of data security and the consequences for you (see below).
- **To conduct market research and surveys:** We may invite you to participate in surveys or market research to help us improve our platform, fundraising, services and strategic development. Participation is always voluntary and no individuals will be identified as a result of this research, unless you consent to us publishing your feedback.
- **To comply with legal, regulatory and tax requirements:** We may process and disclose your personal data where we are required to do so under a legal obligation.

Where you have signed up as a sponsor organisation or as someone connected with a sponsor organisation, we may use also your personal data to provide summary data as part of our Be Collective Plus service to the relevant sponsor organisation. This results in de-identified data and the sponsor organisation will not be provided with your identity or any means by which it can identify you.

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If you are a staff member or employee of a sponsor organisation, that sponsor organisation will have visibility of your registration and relevant activity. That record of contribution will continue even if you deregister, to the extent that it exists and has been created before you deregister.

### Lawful basis of processing

The processing of your personal data will be done only if and to the extent that at least one of the following applies:

- you have given your consent to the processing of the personal data for one or more specific purposes;
- the processing is necessary for the performance of our contract with you for the use of the Be Collective platform and service, or in order to take steps at your request prior to entering into a contract;
- the processing is necessary for compliance with a legal obligation to which we are subject; and/or
- the processing is necessary for the purposes of the legitimate interests pursued by Be Collective, including the efficient provision of the Be Collective service, service improvement, and communications with other actual or prospective users.

### Consent

If there are additional purposes (other than those identified above) for which we propose to use your personal data, the purposes will be specifically notified to you and your consent requested to the proposed use when we collect your personal data for that specific use. We will always give you the option to decline to provide your personal data or to decline to allow us to use that personal data for the purposes for which we have proposed to use it.

### Cookies

When you come to the Be Collective platform, our server attaches a small text file to your hard drive — a cookie. A ‘cookie’ assigns you a unique identifier so that the Be Collective platform can recognise you each time you re-enter the platform, so we can recall where you’ve previously been on our site, and which keeps track of the pages you view on the platform. Cookies help us deliver a better platform experience to you.

The information collected by using a cookie is sometimes called “clickstream.” We use this information to understand how our users navigate our platform, and to determine common traffic patterns, including what site the user came from. We may use this information to make navigation of our platform easier and to help redesign the platform from time to time in order to make your experience on our platform more efficient and enjoyable.

You also have choices with respect to cookies. By modifying your browser preferences, you have the choice to accept all cookies or disable them, to be notified when a cookie is set, or to reject all cookies. If you choose to reject all cookies you will be unable to use those services or engage in activities that require the placement of cookies. Certain aspects of the site may not function properly if you set your browser to reject all cookies.

### Who do we share your information with?

We will only share your data with the following categories of recipient:

- **Third party suppliers:** We may need to share your personal data with data hosting providers or service providers who host our platform or assist us to deliver our services. These providers will

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only act under our instruction and are subject to pre-contract scrutiny and contractual obligations containing strict data protection clauses. Be Collective will take reasonable steps to ensure that its contracts with third parties include requirements for third parties to comply with Data Protection Law in their handling of your personal data.

- **Law enforcement agencies and other official bodies:** We will comply with requests where disclosure is required by law, for example, we may disclose your personal information to the government for tax investigation purposes, or to law enforcement agencies for the prevention and detection of crime. We may also share your information with the emergency services if we reasonably think there is a risk of serious harm or abuse to you or someone else.
- We always aim to ensure that your personal data is only used by those third parties for lawful purposes in accordance with this Privacy Notice.

### Other Disclosure

If a disclosure is not for the purposes we have identified and is not for a reasonably related ancillary purpose or if your upfront consent has not been obtained, Be Collective will not disclose your personal data.

### Data quality and security

Be Collective will review, on an ongoing basis, its collection and storage practices to ascertain how improvements to accuracy of your personal data can be achieved.

Be Collective will take steps, to the extent technically practicable, to destroy or anonymise personal data after as short a time as is reasonably possible after requested, unless the law requires otherwise.

### Security

Be Collective will take all reasonable steps to require employees and contractors to perform their duties in a manner that is consistent with Be Collective's legal responsibilities in relation to Data Protection Law.

Be Collective will review, on a regular and ongoing basis, its information security practices to ascertain how ongoing responsibilities under Data Protection Law can be achieved and improved.

It is important to note, that part of the operation of our platform involves sending personal data over the Internet which is beyond our control and Be Collective cannot guarantee security of your personal data in transmission (as there are always risks associated with transmitting information across the Internet).

### Notification of data breach

In the unlikely event that your personal data is involved in a data breach that is likely to result in serious harm to you, we will inform you and recommend what steps you should take in response to the breach. We will also notify the appropriate supervisory authorities (which in the United Kingdom is the Office of the Information Commissioner) . Each suspected data breach reported to us will be assessed to determine whether it is likely to result in serious harm, and as a result require notification to you.

### Your rights as a data subject

You have the following rights as a data subject, by reason of Data Protection Law:

- **The right to request access to the personal data that we hold about you (also known as a "data subject access request").** This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.

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- **The right to request rectification of the personal data that we hold about you.** This enables you to have any incomplete or inaccurate information we hold about you corrected.
- **The right to request erasure of the personal data that we hold about you (also known as “the right to be forgotten”).** This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing (see below).
- **The right to request restriction of processing about you.** This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.
- **The right to object to processing.** Where we are processing your personal data solely on the grounds that there is a legitimate interest to do so, and there is something about your particular situation which makes you want to object to processing on this ground, then this enables you to challenge the processing. You also have the right to object where we are processing your personal information for direct marketing purposes.
- **The right to data portability.** This enables you to ask us to transfer your personal data to another party in certain circumstances.
- **The right to withdraw consent.** Where our processing of personal data is based on your having given consent, you also have the right as a data subject to withdraw that consent at any time.
- **The right to lodge a complaint.** You have the right to lodge a complaint with a supervisory authority. In the United Kingdom, the supervisory authority is the Office of the Information Commissioner, full contact details for which can be found at <https://ico.org.uk/global/contact-us/>

If you wish to invoke any of the above rights, please contact us using the details set out in the section of this Privacy Notice headed "Contacting Be Collective – Complaints and queries".

### Third parties and other Privacy Policies

The operation of our platform facilitates the provision of your personal data to volunteer organisations and, if you have signed up through a sponsor organisation, you may have done so through that organisation's intranet or utilising their information systems. In either case, your personal data will either be received by a volunteer organisation or reside within your sponsor organisation's storage systems. In both circumstances, your personal data is beyond Be Collective's control and will be under the control of and governed by the relevant privacy policy of the particular organisation.

We may also provide links within our platform to other websites as part of the facilities and services provided by our platform. Be Collective does not endorse the content of any linked website or the organisation operating it. Again, if you visit those websites, any personal data you provide or share will be under the control of that organisation and subject to their privacy policy.

### Transferring information overseas

Be Collective will not transfer your personal data overseas (meaning outside the European Economic Area). If at any time, personal data must be sent overseas by Be Collective for sound business reasons, Be Collective will require the overseas organisation receiving the information to provide a binding undertaking that it will handle that information in accordance with Data Protection Law, including as part of any services contract we enter into.

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### Duration of processing

Be Collective will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements. The appropriate retention period for any given type of personal data depends on a range of factors, including the nature and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure, the purposes for which it was collected, and the applicable legal requirements.

### Automated decision making (including profiling)

Be Collective undertakes no automated decision-making in respect of data subjects. Although we have to construct a profile of volunteers in order to match them with volunteering opportunities, this is not such as to result in decision-making that has legal or similarly significant effects on the data subject.

### Plans for further processing

Be Collective has no plans to process personal data for reasons other than the reason for which the data was originally collected.

### Changes to our Privacy Notice

Our Privacy Notice may change from time to time, so please check this page occasionally to see if we have included any updates or changes, and that you are happy with them because we will not notify you other than in relation to material changes which will be posted as a notification within the platform.