



YE FIVER CHALLENGE PRIVACY POLICY

PLEASE READ THIS PRIVACY POLICY CAREFULLY BEFORE PARTICIPATING IN THE FIVER CHALLENGE OR USING THE WEBSITE

1. Overview

The Young Enterprise Fiver Challenge (the "**Challenge**") is an enterprise programme for young people that challenges them to start a business with just £5.

If you are logging on to www.fiverchallenge.org.uk or subdomain www.schools.fiverchallenge.org.uk (the "**Website**"), our website for the Challenge, and/or using our support services and resources that relate to the Challenge (the "**Services**") or entering pupils and teams into the Challenge, then this privacy policy (the "**Policy**") applies to you.

The Website is 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 12 (at the bottom of this Policy).

Please read this Policy carefully as it explains how we collect and use information about you and your pupils ("**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 about 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/or your pupils and how is it collected?

When you use our Website and Services or you (and your pupils) participate in the Challenge, 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. These are direct collection of information and indirect collection of information. Directly collected information is information you have submitted to us yourself. Indirectly collected information 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:

- Your name;
- Your job title;
- Your email address;
- Your telephone number;
- Your user name;
- The name of the school or organisation you are associated with;
- Your Challenge team names;
- Where you have parental consent to share this information with us about your pupils;

- Your pupils' names, age and gender;
- Photographs/videos of your teams,

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

- register your involvement and/or register your pupils to participate in the Challenge or use our Website or our Services;
- report a problem with our Website or Services or ask a question in respect of the Challenge;
- share information via our Website or social media functions (such as your social media profiles);
- fill in forms;
- contact us (for example, by telephone or email);
- give us feedback and provide evaluation markings (relating to the post Challenge assessment);
- provide us with your reasons for accessing the Website or using our Services or participating in the Challenge, your experience of the Challenge and questions which you have about the Website, our Services or the Challenge; or
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- When you complete a survey from us in respect of the Challenge, our Website or our Services.

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 automatically using cookies and similar tracking technology, as explained further at section 10 of this Policy.

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

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

- **To carry out our commitments to you,** including:
 - processing your application to participate in the Challenge;
 - operating and administering your (and your pupils') participation or other involvement in the Challenge and the national competition;

- providing you with our Website and Services and with information and materials about the Challenge and national competition;
- **To manage your and your pupils' involvement in the Challenge and your Website account** (where you register your participation in the Challenge on our Website) and respond to questions you have for us about the Challenge or our Website or Services (such as technical issues you might be having or a request to reset your password);
- **To pledge the funds to you** to enable your pupils to participate in the Challenge and to process the pledge of those funds;
- **To tell you** about the Challenge, our Services and any changes or updates to the Challenge or to our Services including by sending you a weekly Fiver Update during the Challenge;
- **To promote the Challenge** 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;
- **To publicise the winners of the national competition** on our websites, social media channels, the press and other media (where the pupils' parents have provided their consent to you for us to do so).
- **To answer your questions about the Challenge, our Website and our Services;**
- **To carry out assessments and surveys** to obtain your feedback about the Challenge, our Website and Services;
- **To verify** your identity and account information so we can guard against anyone trying to access your account without your permission;
- **To improve the products, programmes services which we can offer to you (and others)** including improvements to the Challenge and other challenges which we operate;
- **To deal with and respond to any complaints, questions or feedback** which you (and others) provide about the Challenge, our Website or Services;
- **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 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 report any incidents or claims to our insurers**

We may also use information which you have provided or which has automatically been collected from you in an anonymised way. This means that we cannot link the information to you or your pupils 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 the Challenge (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:
 - the number of Fiver participants/teams from the same organisation, in the same region and age-groups of participants
 - age-band of pupils participating in the Challenge from your organisation (e.g. 5-8yrs or 9-11yrs) [the number of attempts made to complete and/or actual completion rates of exercises available through the Website; and]
 - the written words and phrases used by people taking part in the Challenge so that we can try to discover themes and patterns in those written responses.

- **To maintain, protect and improve** the Website our Services and the Challenge by, for example:
 - Presenting information to our leadership team about the Challenge and the people and organisations that take part in it;
 - Promoting communications about our Website and the Challenge 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 Challenge to try to get more support; and
 - To understand the education and work goals and achievements of the people taking part in our Challenge.

4. Legal basis for processing personal information

We will normally collect personal information about you and your pupils from you only where:

- in respect of your pupils, the parent or guardian of the pupil has provided consent for their son, daughter or person in their care to participate in the Challenge;
- 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 also 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:

- **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 Website, Services and the Challenge which are:
 - Bladenmore, who maintain, operate and host the Website;
 - 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 the Challenge; and
 - SurveyMonkey Inc. who provide us with online survey services in respect of the Challenge.
- **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.
- **In the event that we sell or buy our business or property**, 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. 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 the Republic of Ireland.

Bladenmore will process personal information in order to support the operation of our Website and their servers (and those of their sub-processors, UKFast) are located in the United Kingdom.

Where we use personal information to send e-mails to you using the 'MailChimp' service, 'MailChimp's' servers are located in the United States [and in other countries outside the EEA].

Where we send you surveys/feedback requests in relation to the Challenge or our Website or Services and you respond to these, personal information will be processed by 'SurveyMonkey' whose servers are located in the United States [and in other countries outside the EEA].

The companies who operate the 'MailChimp' and 'SurveyMonkey' services are located in the United States and both companies participate in and have certified their compliance with the EU - US Privacy Shield Framework. You can find more information about how these companies will process personal information by reading their privacy policies at <https://mailchimp.com/legal/privacy/> and <https://www.surveymonkey.com/mp/policy/privacy-policy/> and you can read more about the EU – US Privacy Shield Framework at <https://www.privacyshield.gov/list>

We have taken steps to make sure that personal information is protected in line with this Policy where it is processed by us or shared between our group companies and we require all group companies to protect personal information they process about individuals in the EEA in accordance with European Union data protection law.

7. How long do we keep personal information?

We retain personal information we collect from you where we have an ongoing business 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 a business 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 and your pupils have the following data protection rights:

- If you or your pupils 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 your pupils to participate in the Challenge 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 and your pupils 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 and your pupils 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.

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 Website or the Young Enterprise website www.young-enterprise.org.uk and will ask for your permission where the changes are important and where your (or your pupils') permission 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 info@y-e.org.uk
- Write to us at FAO: DCEO, Young Enterprise, Peterley House, Peterley Road, Oxford OX4 2TZ United Kingdom.

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 Yeoman House, Sekforde Street, London, EC1R 0HF.

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.