



## YE TENNER CHALLENGE PRIVACY POLICY

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

#### 1. Overview

The Young Enterprise Tenner Challenge (the "**Challenge**") is an enterprise programme for young people that challenges them to start a business with just £10.

If you are logging on to [www.tenner.org.uk](http://www.tenner.org.uk) or subdomain [www.schools.tenner.org.uk](http://www.schools.tenner.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 participating in any way in 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 (your "**personal information**"), what we do with your personal information, who we share it with (and why), where it may be processed and the choices we give you to control, access and update your 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 how is it collected?

When you use our Website and Services or you participate in the Challenge, you are in control of how much personal information you choose to give us about yourself. 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, for example, your name, age, email address, telephone number, user name, gender, name of the school or college you attend, your Challenge team name, photographs/videos of you and your team (in which case, you must ensure that you respect the rights of others in your team and ensure they are happy for you to provide us with photos/videos of them), information to process your payment for the Challenge, [evaluation markings (relating to the pre and post self- assessment),] location, 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.

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

- register 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; 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 or Services or participate in the Challenge.

**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 your personal information?**

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 participation or other involvement in the Challenge (e.g. if you don't participate in the Challenge yourself, but you administer an organisation's/team's participation in the Challenge);

- providing you with our Website and Services and with information and materials about the Challenge;
- **To manage your 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 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 Tenner 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 answer your questions about the Challenge, our Website and our Services;**
- **To verify** your identity, [age] 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 and have no way of knowing that the information is about you. 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 Tenner participants/teams from the same organisation, in the same region and age-groups of participants

- Website and Service users and their profiles, such as age, education and gender;
  - [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 your 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 from you only where:

- we have your permission;
- we need the personal information to perform a contract with you, or;
- it is in our legitimate interests and not overridden by your data protection interests or fundamental rights and freedoms.

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

Where we collect and use your 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 your 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 your personal information, please contact us using the contact details provided at section 11 below.

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

We may share your 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 your vital interests or those of any other person.
- **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 your 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 your personal information with the seller or buyer of the business or property.

Where we share your 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 your personal information

Your personal information may be transferred to, and processed in, countries other than where you live. Those countries may have data protection laws that are different to the laws of your country (and may not be as protective).

We process your personal information in the United Kingdom and the Republic of Ireland.

Bladenmore will process your 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 your 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, your 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 your 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 your 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 your data?**

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 your personal information).

When we no longer have a business need to process your personal information, we will either delete or anonymise it or, if this is not possible (for example, because your personal information has been stored in backup archives), then we will securely store your 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 your 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 to you or for you to continue to participate in the Challenge if you delete certain pieces of personal information we hold about you – 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 your personal information, ask us to restrict processing of your personal information or request portability of your personal information. Again, you can exercise these rights 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 your personal information with your permission, then you can withdraw your permission at any time but we may still be entitled to use your 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 Website or 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 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](mailto: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.