

**Update : 20 February 2021**

# **Angloville – Privacy Policy, Data Processing and Use of Cookies**

## **1. Preamble**

Thank you for taking the time to review the Privacy Policy of Angloville. This Privacy Policy should be read in conjunction with the Angloville Terms and conditions. The relationship with participants, clients and prospective participants is based on honest and transparent communication. Angloville and the Foundation as data controllers commit to adhere to all relevant guidelines and regulations specified in this document and relevant Irish, Polish and EU regulation.

Angloville has adapted this website to the requirements of Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 concerning the protection of natural persons (GDPR) in order to offer the highest legal guarantees in relation to your privacy.

## **2. Details of data controllers**

Those responsible for processing the data collected through this Website are:

- Angloville International Ltd IRELAND: St Mary's College, Emmet Place, Youghal, Co Cork, Ireland. Tax number: 3458878JH. Company number: 596977.
- Foundation 'Development without Borders' [Polish: Fundacja 'Rozwój Bez Granic'], the legal entity collaborating with Angloville, responsible for providing volunteer opportunities in Europe during an Angloville cultural immersion (Fundacja 'Rozwój Bez Granic', registered address: Ul. Edwarda Heila 9/52, 30-654 Kraków, Poland)

If you need to contact the data controllers you can do so via:

email: [info@angloville.com](mailto:info@angloville.com)

website: <https://angloville.com>

phone: +44 20 3966 4098 (UK), +1 845 402 6193 (US), +61 2 8520 1091 (AUS)

### 3. What are your data protection rights?

We would like to make sure you are fully aware of all of your data protection rights. Every user of the Website and every participant and Volunteer is entitled to the following:

**The right to access** – You have the right to request Angloville for copies of your personal data.

**The right to rectification** – You have the right to request that Angloville correct any information you believe is inaccurate. You also have the right to request Angloville to complete the information you believe is incomplete.

**The right to erasure** – You have the right to request that Angloville erase your personal data, under certain conditions.

**The right to restrict processing** – You have the right to request that Angloville restrict the processing of your personal data, under certain conditions.

**The right to object to processing** – You have the right to object to Angloville's processing of your personal data, under certain conditions.

**The right to data portability** – You have the right to request that Angloville transfer the data that we have collected to another organisation, or directly to you, under certain conditions.

If you make a request, we have one month to respond to you. If you would like to exercise any of these rights, please contact us via the channels listed above.

## 4. Types of data collected, purpose and term of data processing

For the purposes of providing the Service, Angloville collects personal data based on consent from the user.

### 4.1. User and participant database

#### 4.1.1. Online application

Name of data processing: Data related to online application

Purpose of data processing: registration of participants to an Angloville Programme. Data collected from the user are required for identification and establishing contact with the user. Angloville will contact the applicant within 3 working days using one of the contacts provided. Additional purpose of data processing is the ability to contact users about relevant new opportunities, new Programmes and services via one of the contact channels provided (e-mail or phone).

Personal data will be shared with the Foundation as the organiser of Volunteer opportunities on Angloville cultural exchange programmes. Relevant personal data, i.e. name and dietary information will be shared with third parties providing accommodation and meals services in order to perform the Service as requested by the participant.

Legal basis of data processing: consent from the user.

Types of personal data processed: first name, last name, email address, phone number, date of birth, address, country of origin, city of residence, COVID vaccination status, employment history and work experience, social media profile, dietary preferences, allergies, emergency contact name and phone number, criminal record document, passport copy (including photo).

Term of data processing: 10 years from the time of application.

#### 4.1.2. Online inquiry

Name of data processing: Data related to online inquiry about Services or request of information through download or e-mail.

Purpose of data processing: providing users with further information on Angloville Services and content related to travel, teaching and cultural exchange programmes.

Data collected from the user are required for identification and establishing contact with the user. Angloville will contact the applicant within 3 working days using one of the contacts provided. Additional purpose of data processing is the ability to contact users about relevant new opportunities, new Programmes and services via one of the contact channels provided (e-mail or phone).

Legal basis of data processing: consent from the user.

Types of personal data processed: first name, last name, email address, phone number, country of origin.

Term of data processing: 10 years from the time of application.

#### 4.1.3. Newsletter subscription

Name of data processing: Data related to electronic newsletters.

Purpose of data processing: providing electronic newsletter over e-mail or other direct messaging (e.g. sms) channel about Angloville's Services.

Angloville will provide regular and occasional updates about its Services, send marketing messages about its new Programmes and opportunities to those users who subscribed to this service. Occasionally, other messages may also be sent to users.

Legal basis of data processing: consent from the user. User indicates consent to receiving newsletters by ticking the "subscribe to the newsletter" check-box on online forms or clicking on a direct link received via email.

Types of personal data processed: first name, last name, e-mail address, phone number.

Term of data processing: until user unsubscribes. Users can unsubscribe from the newsletter at any time by clicking on the “Unsubscribe” link in any of the newsletter emails or sending an unsubscribe request via e-mail to [info@angloville.com](mailto:info@angloville.com).

## 4.2. Cookies

Angloville uses cookies in a range of ways to improve your experience on our Website, including:

- Keeping you signed in
- Enable you to purchase Services in the shop
- Understanding how you use our website

In general, cookies are used to retain user preferences, store information for things like shopping carts, and provide anonymised tracking data to third party applications like Google Analytics. Cookies do not store personal data, they are used only to identify your web browser. As a rule, cookies will make your browsing experience better. However, you may prefer to disable cookies on this site and on others. The most effective way to do this is to disable cookies in your browser. We suggest consulting the Help section of your browser or taking a look at [the About Cookies website](#) which offers guidance for all modern browsers

Cookies used on the Website:

### 4.2.1. Essential (session) cookies

These cookies ensure that users have a smooth browsing experience on the Website, use all its functions and the services available there. These types of cookies expire with the end of the browsing session, and they are automatically deleted when the browser is closed. Cookie preference settings are also essential cookies as they are used by the Website to remember the user's cookie preferences, so there is no need to set them again next time.

#### 4.2.2. Third-party analytical cookies

To analyse the behaviour of users of the Website and to improve the efficiency of advertising, Angloville uses third-party cookies. These are Google Analytics and Google Ads cookies.

#### 4.2.3. Third-party marketing cookies

Angloville uses cookies that collect user level data on the Website in order to be able to provide targeted ads and offers to these users. These are Google Ads Remarketing, Google Ads Conversion tracking and Facebook Remarketing (Facebook Pixel) cookies.

Google Remarketing and Facebook Remarketing cookies are used to be able to target users of the Website with Angloville's ads on Google's and Facebook's advertising places. Angloville uses Google Remarketing for its advertising. Angloville's advertising may be shown by third-parties, such as Google on other websites. Angloville and third-party service providers use both own cookies (e.g. Google Analytics cookies) and third-party cookies (e.g. DoubleClick cookies) to analyse users' behaviour on previous browsing sessions and to optimise advertising. Third-party cookies are stored on the user's computer or other device until their expiry or until deleted by the user.

## 5. How do we store your personal data?

In accordance with the provisions of the GDPR, Angloville informs you that it has implemented the necessary technical and organisational security measures to guarantee the security of your personal data and to prevent the alteration, loss and unauthorised processing and / or access of said data, taking into account the state of the technology, the nature of the stored data and the risks to which they are exposed, whether they come from human action or from the physical or natural medium.

Angloville continuously maintains the supervision, control and evaluation of data processing to ensure the privacy of the information you provide us, thus establishing additional measures to strengthen the integrity and confidentiality of our system.

Your personal data entered in forms on the Website is securely stored on the hosting provider's servers: SiteGround Spain S.L. Calle Prim 19, 28004, Madrid, Spain.

Angloville uses CRM systems to store data of participants. Personal data is stored securely by operators/hosts of these CRM systems:

- Pipedrive: Pipedrive OU Mustamäe tee 3a Tallinn, Harjumaa 10615 Estonia
- Angloville CRM: Hetzner Online GmbH, Industriestr. 25, 91710 Gunzenhausen, Germany

Angloville's newsletter is distributed via "Mailchimp", a newsletter shipping platform of MAILCHIMP - 675 Ponce de Leon Ave, Suite 5000, Atlanta, GA 30308, USA.



The e-mail addresses of our Newsletter recipients, as well as their other information described in these notes, are stored on the servers of Mailchimp in the US. Mailchimp uses this information to send and evaluate the newsletters on our behalf. Furthermore, Mailchimp may, according to its own information, use this data to optimise or improve its own services, e.g. for the technical optimization of the shipping and the presentation of the newsletter or for economic purposes, to determine from which countries the recipients come.

## 6. Right to lodge a complaint

You have the right to lodge a complaint about the processing of your personal data by us to a supervisory authority for data protection.

## 7. How to contact the appropriate authority

Should you wish to report a complaint or if you feel that Angloville or the Foundation have not addressed your concern in a satisfactory manner, you may contact the Data Protection Commission:

Website: <https://www.dataprotection.ie/en/contact/how-contact-us>

Address: 21 Fitzwilliam square South. Dublin 2, D02 RD28, Ireland

Polish Personal Data Protection Office

Website: <https://uodo.gov.pl/en>

Email: [kancelaria@uodo.gov.pl](mailto:kancelaria@uodo.gov.pl)

Address: ul. Stawki 2, 00-193 Warsaw, Poland