

PRIVACY POLICY

Ellen MacArthur Foundation, a registered charity (charity number 1130306) and incorporated as a company limited by guarantee (company number 06897785), and its trading subsidiary Ellen MacArthur Foundation Trading Limited, incorporated as a company limited by guarantee (company number 07110767), each of whose registered office is at The Sail Loft, Medina Road, Cowes, Isle of Wight PO31 7BX (together "EMF") are each committed to protecting and respecting your privacy.

This policy (together with (i) EMF's terms and conditions of use – Circular Economy SMF Prototype and (ii) any consent you have provided to us in relation to the processing of your personal data) sets out the basis on which any personal data we collect from you, or that you provide to us, from your use of our programme known as Circular Economy SMF Prototype, will be processed by us. Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it.

References in this policy to "we", "us" or "our" include EMF, any third party which hosts the Circular Economy SMF Prototype and any third party licensee of the Circular Economy SMF Prototype through which you have access to and use of the Circular Economy SMF Prototype.

Information we may collect from you

We may collect and process the following data about you:

- **Information you give us.** You may give us information about you by using the Circular Economy SMF Prototype or by corresponding with us by phone, e-mail, social media platform or otherwise. This includes information you provide when you register to use the Circular Economy SMF Prototype and when you report a problem with the Circular Economy SMF Prototype. The information you give us may include your name, address, e-mail address and phone number. It also includes the content and other information you post on the Circular Economy SMF Prototype, whenever you use it.
- **Information we collect about you.** With regard to your use of the Circular Economy SMF Prototype we may automatically collect the following information:
 - technical information, including the Internet Protocol (IP) address used to connect your computer to the Internet, your login information, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform; and
 - if applicable, information about your use of the Circular Economy SMF Prototype, including the full Uniform Resource Locators (URL) clickstream to, through and from the Circular Economy SMF Prototype (including date and time), response times, download errors, length of use, interaction information and methods used to browse away from the Circular Economy SMF Prototype and any phone number used to call us.
- **Information we share with other sources.** We may receive information about you if you use any of the other applications or websites we operate or the services we provide. We may share information with third parties where we believe it reasonably necessary for the proper functioning of the Circular Economy SMF Prototype to do so and with regulators, crime prevention agencies or such other persons as we may be required to do so by law.

Cookies

The Circular Economy SMF Prototype may use cookies to distinguish you from other users. This helps to provide you with a good experience when you use it and also allows improvements to be made.

Uses made of the information

We may use information held about you in the following ways:

- **Information you give to us.** We may use this information:
 - *Circular Economy SMF Prototype*
 - to give you access to and use of the Circular Economy SMF Prototype;
 - to operate, maintain, modify, revise, enhance and update the Circular Economy SMF Prototype;
 - to contact you about information you have uploaded onto any Circular Economy SMF Prototype interactive platform; and
 - to ensure that the Circular Economy SMF Prototype is capable of being used by you in the most effective manner for you.
 - *Marketing*
 - only with your consent, to send marketing and other information to you from time to time relating to:
 - our – and the EMF group - charitable objectives, mission and activities that we think you might be interested in; and/or
 - third party events or information relating to the circular economy that we think you might be interested in.
- **Information we collect about you.** We may use this information:
 - to verify your identity;
 - to perform our obligations under our terms and conditions of use – Circular Economy SMF Prototype;
 - to administer the Circular Economy SMF Prototype and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes;
 - to improve the Circular Economy SMF Prototype to ensure that it is capable of being used by you in the most effective manner for you;
 - to allow you to participate in interactive features of the Circular Economy SMF Prototype (if any), when you choose to do so; and
 - as part of efforts to keep the Circular Economy SMF Prototype safe and secure.

- We may combine this information with information you give to us and information we collect about you. We may use this information and the combined information for the purposes set out above (depending on the types of information we receive).

Disclosure of your information

We may share your personal information with any member of our group, which includes our subsidiaries and any associated companies or charities (including those in the United States of America and Brazil). Please see the section below headed "*Where we store your personal data*" about any transfer, storage or processing by us of personal information outside the European Economic Area.

We may share your information with selected third parties including our partners, agents and service providers.

We may disclose your personal information to third parties if we are under a duty to disclose or share your personal data in order to comply with any law or legal obligation (including to investigate or prevent crime), or in order to enforce or apply our terms and conditions of use – Circular Economy SMF Prototype, or to protect our rights, property or the safety of others.

Retention

We will only hold your personal information for as long is necessary:

- to enable us to give you access to and use of the Circular Economy SMF Prototype, to enable us to administer, operate, maintain, modify, revise, enhance and update it, to contact you about information you have uploaded onto any Circular Economy SMF Prototype interactive platform and to ensure that the Circular Economy SMF Prototype is capable of being used by you in the most effective manner for you – we will cease to process personal information about you for these purposes promptly upon you notifying us that you wish to cease to use the Circular Economy SMF Prototype; and
- to send marketing and other information to you from time to time relating to our charitable purposes, mission and activities (if you have consented to the same) – we will cease to process personal information about you for these purposes promptly upon you notifying us that you do not wish to receive such marketing and other information.

You should be aware that personal information which you upload onto any Circular Economy SMF Prototype interactive platform may remain there, notwithstanding that you have notified us that you wish to cease to use the Circular Economy SMF Prototype.

We will periodically review the personal information we hold about you to determine whether it is still necessary for us to be holding it for the purposes set out above.

Where we store your personal data

The data that we collect from you may be transferred to, stored at, and/or processed by people or organisations (including other members of our group or associated companies or charities) working in a destination outside the European Economic Area. Any such transferral, storage or processing will be undertaken in accordance with the General Data Protection Regulation (GDPR) (Regulation (EU) 2016/279). We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this privacy policy.

Where you have been given (or where you have chosen) a password which enables you to access the Circular Economy SMF Prototype, you are responsible for keeping this password confidential. We ask you not to share a password or any other login details with anyone.

Unfortunately, the transmission of information via the internet or other electronic means is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to the Circular Economy SMF Prototype; any transmission is at your own risk.

Websites of other organisations

The Circular Economy SMF Prototype may, from time to time, contain links to and from the websites of other organisations. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites.

Your rights

You have the right to access information held about you upon request. We will tell you what information we hold about you and provide you with a copy in line with data protection law.

In addition, you have the right to request that your personal data be rectified or erased, or to object to our processing of it, as well as the right to have your personal data transferred to another organisation, in each case in line with data protection law.

If you have a complaint about our processing of your personal data, you have the right to lodge it with the Information Commissioner's Office (<https://ico.org.uk/global/contact-us/>).

Contact

If you wish to contact us in connection with this privacy policy and/or the processing of your personal data referred to in it, please contact Gail Willows at: The Sail Loft, Medina Road, Cowes, Isle of Wight, PO31 7BX or email gail.willows@ellenmacarthurfoundation.org

Changes to this privacy policy

Any changes EMF may make to this privacy policy in the future will be made available on the Circular Economy SMF Prototype. Please check back frequently to see any updates or changes to this privacy policy.