

THE CIRCLE OF YOUNG INTRAPRENEURS PRIVACY POLICY

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About this Privacy Policy

We care about your privacy and we think it is important that you always know what information we obtain about you in the context of your use of the Circle of Young Intrapreneurs website and what that information is used for. In the Privacy Policy below, we therefore aim to keep you fully informed as to the type, extent and purpose of the collection, storage, use and processing of personal data on our websites, mobile platforms and mobile products and/or services relating to the Circle of Young Intrapreneurs website which is available at <https://www.circleofyi.com/> (the "Website").

Personal data is all information relating to an identified or an identifiable natural person. A person is identified when the identity of a specific person can be deduced from the information itself. A person is identifiable when we can make a connection to a specific person using additional information available to us.

This Privacy Policy applies to the Website only.

Please read this Privacy Policy carefully to understand our practices regarding your personal data

Our Privacy Policy applies to any user of our website.

and how we will treat it.

IF YOU DO NOT AGREE WITH OUR POLICIES AND PRACTICES, DO NOT VISIT OUR WEBSITE.

By visiting the Website, you acknowledge the terms of this Privacy Policy and the use and disclosure of your personal data as set out in this policy.

Who we are

We are The Circle of Young Intrapreneurs Limited of London, UK (hereinafter: "**COYI**" "**The Circle of Young Intrapreneurs**" "**we**" or "**us**").

We are the provider of the Website and the organisation responsible for the personal data you provide as part of using the Website within the meaning of applicable data protection and privacy laws.

We are an organisation who helps to develop and deliver business ideas inside large, corporate organisations that both generate profits and have a positive social impact simultaneously.

How to contact us

If you have any questions about this Privacy Policy or our use of your personal data, if you need to report a problem, or if you would like to exercise one of your rights under this Privacy Policy you can contact us using the following contact details:

Email: team@circleofyi.com

You can contact our dedicated privacy contact with any queries or complaints regarding your data.

How we get information

When you: (i) sign up to the Website, (ii) elect to receive emails by being on our mailing list, or (iii) join our "100 Day" training programme, you give us the following information:

- your name;
- your email address;
- your location (both city and country);
- the company you work for; and
- your Twitter handle.

When you visit the Website our server will record your IP address together with the date, time and duration of your visit. An IP address is an assigned number, similar to a telephone number, which allows your computer to communicate over the Internet. It enables us to identify which

We collect certain information about you when you sign up to our website.

organisations have visited the Website

IF YOU DO NOT WANT US TO COLLECT ANY OF THE INFORMATION DESCRIBED IN THIS SECTION, DO NOT USE OUR WEBSITE.

Linking to third party websites

Within the Website, you may be provided with the option to link through to other websites. These other domains, apps and websites are subject to their own privacy practices and we encourage you to read the privacy policies of each and every website and application with which you interact. You visit these other websites or applications at your own risk.

You should be aware that personal data that you voluntarily include and transmit online in a publicly accessible blog, chat room, social media platform or otherwise online or that you share in an open forum may be viewed and used by others without any restrictions. We are unable to control such uses of your data and by using such services, you assume the risk that the personal data you provide may be viewed and used by third parties for any number of purposes.

Other websites and applications may use your data differently and have their own privacy policies. You should always read those policies.

Why we collect, process and use your information

We collect, process and use your personal data for the following purposes:

To manage the "100 day" training programme

- to contact members with relevant COYI news and information relevant to the training programme
- for internal administration in relation to the "100 day" training programme

For marketing and promotion purposes

- to contact members with relevant COYI news on latest events, projects, case studies and research. Chapter leads may also contact members directly to arrange meetings or discuss projects

For business administrative purposes

- to facilitate our internal business administration, including maintaining proper business records
- to administer databases (including our contacts database)
- to establish and manage good commercial or stakeholder relations with you or the organisation with which you are associated
- to investigate or respond to any incidents, complaints or grievances

We use your data to manage our "100 day" training programme.

We use your data to provide you with details of our events, projects and research.

We use your data for business administrative purposes.

- to compile statistical data on the use of the Website to track how users navigate through the Website in order to enable us to evaluate and improve our site
- to administer the Website and for internal operations; and
- as part of our efforts to keep the Website and our physical and digital assets safe and secure.

How long we keep your information for

We retain your personal data until you unsubscribe from our mailing list or otherwise ask us to delete your data.

We don't keep your data forever.

Your rights

You have various rights in relation to the data which we hold about you. To get in touch with us about any of your rights under applicable data protection laws, please use the contact details set out above. We will seek to deal with your request without undue delay, and in any event within any time limits provided for in applicable data protection law (subject to any extensions to which we are lawfully entitled). Please note that we may keep a record of your communications to help us resolve any issues which you raise.

You have a number of rights regarding your data. These may vary depending on your location.

The European General Data Protection Regulation (the "**GDPR**") gives you the following rights in relation to your personal data:

Right to object

This right enables you to object to us processing your personal data where we do so for one of the following reasons:

- because it is in our legitimate interests to do so (for further information please see the section on our legal bases for processing below);
- to enable us to perform a task in the public interest or exercise official authority;
- to send you direct marketing materials; or
- for scientific, historical, research, or statistical purposes.

Right to withdraw consent

If we obtain your consent to process your personal data for any activities, you may withdraw this consent at any time and we will cease to use your data for that purpose unless we consider that there is an alternative legal basis to justify our continued processing of your data for this purpose, in which case we will inform you of this condition.

Data Subject Access Requests

You may ask us for a copy of the information we hold about you at any time, and request us to modify, update or delete such information. If we provide you with access to the information we hold about you, we will not charge you for this unless permitted by law. If you request further copies of this information from us, we may charge you a reasonable administrative cost. Where we are legally permitted to do so, we may refuse your request. If we refuse your request we will always tell you the reasons for doing so.

Right to erasure

You have the right to request that we "erase" your personal data in certain circumstances. Normally, this right exists where:

- The data are no longer necessary;
- You have withdrawn your consent to us using your data, and there is no other valid reason for us to continue;
- The data has been processed unlawfully;
- It is necessary for the data to be erased in order for us to comply with our obligations under law; or
- You object to the processing and we are unable to demonstrate overriding legitimate grounds for our continued processing.

We would only be entitled to refuse to comply with your request for erasure in limited circumstances and we will always tell you our reason for doing so. When complying with a valid request for the erasure of data we will take all reasonably practicable steps to delete the relevant data.

Right to restrict processing

You have the right to request that we restrict our processing of your personal data in certain circumstances, for example if you dispute the accuracy of the personal data that we hold about you or you object to our processing of your personal data for our legitimate interests. If we have shared your personal data with third parties, we will notify them about the restricted processing unless this is impossible or involves disproportionate effort. We will, of course, notify you before lifting any restriction on processing your personal data.

Right to rectification

You have the right to request that we rectify any inaccurate or incomplete personal data that we hold about you. If we have shared this personal data with third parties, we will notify them about the rectification unless this is impossible or involves disproportionate effort. You may also request

details of the third parties that we have disclosed the inaccurate or incomplete personal data to. Where we think that it is reasonable for us not to comply with your request, we will explain our reasons for this decision.

Right of data portability

If you wish, you have the right to transfer your personal data between service providers. In effect, this means that you are able to transfer the details we hold on you to another third party. To allow you to do so, we will provide you with your data in a commonly used machine-readable format so that you can transfer the data. Alternatively, we may directly transfer the data for you.

Right to complain

You also have the right to complain to your data protection authority.

In the UK the data protection authority is the Information Commissioner's Office. You can contact them in the following ways:

- Phone: 0303 123 1113
- Email: casework@ico.org.uk
- Post: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF

Sharing your information

In general, your data is processed exclusively by us and we do not pass on any personal user data to third parties unless we need to do so in order to offer you certain Website and membership services. Where we do share your personal data, we do so with the following categories of recipients:

Service Providers

In order to provide our services we work with service providers (e.g. Amazon Web Services, email service providers, platform providers) who may, in the course of providing the respective services, receive and process personal data on our instruction and on the basis of a commissioned data processing agreement.

Related Entities

We may disclose your personal data to our affiliated companies.

Regulatory bodies

We may disclose your personal data:

- to data protection regulatory authorities;

We may need to share your data with limited third parties (e.g. to help us provide the Website).

- in response to an enquiry from a government agency; and
- to other regulatory authorities with jurisdiction over our activities.

Professional advisors and Auditors

We may disclose your personal data to professional advisors (such as legal advisors and accountants) or auditors for the purpose of providing professional services to us.

Replacement providers

In the event that we sell or buy any business assets, we may disclose your personal data to the prospective seller or buyer of such business or assets. If COYI or substantially all of its assets are acquired by a third party, personal data held by us about our clients will be one of the transferred assets.

At your option

In certain circumstances, you have the option of sharing information with others yourself as part of the Website (e.g. if you give out personal data in a publically accessible player or forum profile). However, we do not transfer such data to other third parties.

For example, within the Website, you may be provided with the option to link through to other websites or communities. These other domains, apps and websites are subject to their own privacy practices and we encourage you to read the privacy policies of each and every website and application with which you interact. You visit these other websites or applications at your own risk.

You should be aware that personal data that you voluntarily include and transmit online in a publicly accessible blog, chat room, social media platform or otherwise online or that you share in an open forum may be viewed and used by others without any restrictions. We are unable to control such uses of your data and by using such services, you assume the risk that the personal data you provide may be viewed and used by third parties for any number of purposes.

Otherwise, your data will only be disclosed in special exceptional cases, where we are obligated or entitled to do so by statute or upon binding order from a public authority.

Changes to this Privacy Policy

We will review this Privacy Policy periodically, and reserve the right to modify and update it at any time. You acknowledge that we may make changes to this Privacy Policy and it is your responsibility to check back to this page from time to time to review the Privacy Policy. Changes to this Privacy Policy will come into effect immediately upon such changes being uploaded to our Website.

Changes to this Privacy Policy apply to your use of our Website after the “effective date.”

Security

We care about protecting your personal data. That's why we put in place appropriate security measures, including encryption techniques, which are designed to prevent any misuse of the data that you provide to us.

Unfortunately, there is always risk involved in sending information through any channel over the internet. You send information over the internet entirely at your own risk. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted over the internet and we do not warrant the security of any information, including personal data, which you transmit to us over the internet.

If you suspect any misuse, loss, or unauthorised access to your personal data please let us know immediately using the contact details set out above. We will investigate the matter and update you as soon as possible on next steps.

We take security seriously and put in place measures to protect your information

Where your information is transferred and stored

In general, your data will be stored in the United Kingdom and the United States of America, where our servers are located.

In the event that we transfer your personal data to another country and where the country or territory in question does not maintain adequate data protection standards, we will take all reasonable steps to ensure that any such transfers is undertaken in accordance with applicable data protection and privacy laws and that your data is treated securely and in accordance with this Privacy Policy. However, please note that where personal data is stored in another country, it may be accessible to law enforcement agencies in accordance with domestic laws.

We may store, transfer and use your data outside your country.

Legal bases for processing your information

The GDPR requires us to inform you of the different legal bases that we rely on to legitimize our processing of your personal data. We have described these below.

Where processing your information is within our legitimate interests

We are allowed to use your personal data where it is in our interests to do so, and those interests aren't outweighed by any potential prejudice to you.

We believe that our use of your personal data is within a number of our legitimate interests, including but not limited to:

- To manage our services;
- To ensure that our systems run smoothly;
- To protect against improper use or unauthorized use of our Website; and
- To market our Website and services.

We don't think that any of the activities set out above will prejudice you in any way. However, you

We rely on certain lawful bases to collect, use and share data about you if you are in the EU.

do have the right to object to us processing your personal data on this basis. We have set out details regarding how you can go about doing this in the section on your rights above.

Where processing your personal data is necessary for us to carry out our obligations under our contract with you

We are allowed to use your personal data when it is necessary to do so for the performance of our contract with you. For example, we need to process certain personal data about you in order to be able to provide you with any services that you request from us.

Where processing is necessary for us to carry out our legal obligations

As well as our obligations to you under any contract, we also have other legal obligations that we need to comply with, and we are allowed to use your personal data when we need to comply with those other legal obligations.