

# Young Enterprise **Trading Station**

A Member of JA Worldwide

Last updated: 23 September 2020

This Trading Station Privacy Notice for our site available at www.ye-tradingstation.org.uk (including our Trading Station platform available on our site) ("our site") gives you information about our processing of your personal information in connection with the personal data you provide to us and the personal data we collect from you as a user of our site. This notice applies to individuals who access, use or visit our site and/or seek to purchase products or services ("Visitors") and students (and their parents, quardians and teachers) who seek to sell and supply products and services through our site ("Student Companies").

If you have any questions or concerns about our use of your personal information, then please contact us using the contact details provided at the bottom of this notice.

#### **Quick links**

We recommend that you read this notice in full to ensure you are fully informed. However, if you only want to access a particular section of this notice, then you can click on the relevant link below to jump to that section.

- 1. Who we are
- 2. Information we collect about you
- 3. Our use of your information
- Legal basis for processing personal information 4.
- 5. Cookies and similar tracking technology
- Security of your information 6.
- 7. Disclosures of your information
- 8. Where we store your personal data and data transfers
- 9. **Retaining your information**
- Your data protection rights 10.
- 11. Third party links
- 12. **Contact us**
- 13. **Changes to this Privacy Notice**

#### 1. Who we are

Young Enterprise, a charity registered in England and Wales ("we", "us", "our"). We are an educational charity which engages with young people to harness their personal and business skills and to encourage enterprise. Our charity registration number is 313697 and our registered office is at the Coram Campus, 41 Brunswick Square, London, WC1N 1AZ. We are regulated by the Charity Commission. To contact us, please email ve-tradingstation@y-e.org.uk.

We are the data controller of your personal information.

# 2. Information we collect about you

Information that you provide to us voluntarily

We may collect and process different information about you depending on how you interact with our site.

#### (A) Visitors

When you visit our site and purchase products through our site we collect information from you. This includes when you fill out forms on our site (or other forms we ask you to complete), correspond with us by phone, e-mail or otherwise, or make any purchase through our site. This information includes personal details such as your name, address, and email address; and financial information such as your bank account details in order to facilitate the completion of orders made through our site. The personal information that you are asked to provide, and the reasons why you are asked to provide it, will be made clear to you at the point we ask you to provide your personal information.

# (B) Student Companies

We collect information from you when you register an account on our site to sell products. This information includes YE Student Company name and reference number; personal details such as your name, address, and email address; any account login details and financial information such as your bank account details in order to facilitate the completion of orders made through our site.

Information that we collect automatically

When you visit our site, we may collect certain information automatically from your device. In some countries, including the UK and countries in the European Economic Area, this information may be considered personal information under applicable data protection laws.

Specifically, the information we collect automatically may include information like your IP address, device type, unique device identification numbers, browser-type, broad geographic location (e.g. country or city-level location) and other technical information. We may also collect information about how your device has interacted with our site, including the pages accessed and links clicked.

Collecting this information enables us to better understand the visitors who come to our site, where they come from, and what content on our site is of interest to them. We use this information for our internal analytics purposes and to improve the quality and relevance of our site to our visitors.

Some of this information may be collected using cookies and similar tracking technology, as explained further under the heading "Cookies and similar tracking technology" below.

Information that we obtain from third party sources

We may also collect some information from other sources but only where we have checked that these third parties either have your consent or are otherwise legally permitted or required to disclose your personal information to us. The types of information we collect from third parties include information about how visitors use our website and we use the information we receive from these third parties to maintain and improve the accuracy of the records we hold about you.

# 3. Our use of your information

We may use the personal information described above in order to:

facilitate purchases on our site;

- operate, manage, develop and promote our business and our site, in particular, our relationship with you or the organisation you represent (if any) for example, for marketing purposes;
- operate, administer and improve our site and other aspects of the way in which we conduct our operations;
- provide you with the information, products and services you request from us;
- notify you about changes to our site and any services provided on our site;
- maintain our own accounts and records; and
- meet our legal and regulatory obligations.

We will only process your personal information as necessary so that we can pursue the purposes described above, and then only where we have taken the necessary steps to ensure that our processing does not prejudice you or your privacy rights in a way.

# 4. Legal basis for processing personal information

Our legal basis for collecting and using the personal information described above will depend on the personal information concerned and the specific context in which we collect it.

However, we will normally collect personal information from you only (i) where we need the personal information to perform a contract with you, (ii) where the processing is in our legitimate interests and not overridden by your rights, or (iii) where we have your consent to do so. In some cases, we may also have a legal obligation to collect personal information from you or may otherwise need the personal information to protect your vital interests or those of another person (e.g. collecting and processing information about users of the website in order to protect the interests of young people using the website).

If we ask you to provide personal information to comply with a legal requirement or to perform a contract with you, we will make this clear at the relevant time and advise you whether the provision of your personal information is mandatory or not (as well as of the possible consequences if you do not provide your personal information).

If we collect and use your personal information in reliance on our legitimate interests (or those of any third party), this interest will normally be to operate our site and communicating with you as necessary to provide our services to you and for our legitimate commercial interest, for instance, when responding to your queries, improving our site and services, undertaking marketing, or for the purposes of detecting or preventing illegal activities. We may have other legitimate interests and if appropriate we will make clear to you at the relevant time what those legitimate interests are.

If you have questions about or need further information concerning the legal basis on which we collect and use your personal information, please contact us using the contact details provided below.

### 5. Cookies and similar tracking technology

If you visit our site it will automatically connect some information about you and your visit, including the IP address used to connect your device to the internet and some other information such as your browser type and version and the pages on our site that you visit.

Our site may also use cookies to distinguish you from other users of our site. This helps us to provide you with a good experience when you browse our site and also allows us to improve our site. For detailed information on the cookies we use and the purposes for which we use them see our <u>Trading Station Cookies</u> Notice.

#### 6. Security of your information

We use appropriate technical and organisational measures to protect the personal information that we collect and process about you. The measures we use are designed to provide a level of security appropriate to the risk of processing your personal information. Specific measures we use include encrypting personal information in transit using SSL encryption.

## 7. Disclosures of your information

We may disclose your personal information to the following categories of recipients:

- to any member of our group, which means our subsidiaries, our ultimate holding company and its subsidiaries, as defined in section 1159 of the UK Companies Act 2006;
- to service providers who host our site or other information technology systems or otherwise hold or process your information on our behalf, under strict conditions of confidentiality and security;
- to business partners, suppliers and subcontractors for the performance of any contract we enter into with them or you;
- to any other person with your consent; and
- in exceptional circumstances:
  - to competent regulatory, prosecuting and other governmental agencies, or litigation counterparties or third parties in any country or territory where we believe disclosure is necessary (i) as a matter of applicable law or regulation, (ii) to exercise, establish or defend our legal rights, or (iii) to protect your vital interests or those of any other person; or
  - o where we are required by law to disclose.

In some circumstances, and only where necessary, we may share Student Company information with your teacher, parent or guardian.

#### 8. Where we store your personal data and data transfers

The data that we collect from you may be transferred to, stored at, and processed by staff, at a destination outside the European Economic Area ("EEA"). If you are dealing with us within the EEA (or the United Kingdom, after it has left the EEA), you should be aware that this may include transfers to countries which do not have similarly strict data privacy laws. However, unless they are located in a country which has been assessed by the European Commission as ensuring an adequate level of protection for personal data, we will ensure we have taken appropriate safeguards to require that your personal information will remain protected in accordance with this notice. These include implementing the European Commission's Standard Contractual Clauses. Please contact us at <a href="mailto:ye-tradingstation@y-e.org.uk">ye-tradingstation@y-e.org.uk</a> if you would like to know whether any such agreements are in place or to see a copy of any of these agreements.

# 9. Retaining your information

We retain personal information we collect from you where we have an ongoing organisational 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 an organisational 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.

#### 10. Your data protection rights

You have the following data protection rights:

- a right to access, correct, update or request deletion of the personal data that we hold about you. You can exercise this right at any time by emailing us at <a href="mailto:ye-tradingstation@y-e.org.uk">ye-tradingstation@y-e.org.uk</a>.
- object to our use of your personal information or ask us to restrict processing. In some circumstances
  you may have a "data portability" right to require us to transfer your information to you or another
  organisation. If you wish to exercise (or find out more about) any of these rights, please email us at yetradingstation@y-e.org.uk.
- 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 at <a href="mailto:ye-tradingstation@y-e.org.uk">ye-tradingstation@y-e.org.uk</a>.
- if we have collected and process your personal information with your consent, then you can withdraw your consent at any time. Withdrawing your consent will not affect the lawfulness of any processing we conducted prior to your withdrawal, nor will it affect processing of your personal information conducted in reliance on lawful processing grounds other than consent.

You can also raise complaints or concerns about our processing of your personal information with the Office of the Information Commissioner, which regulates data protection in the UK. Details are available at www.ico.org.uk.

We respond to all requests we receive from individuals wishing to exercise their data protection rights in accordance with applicable data protection laws.

#### 11. Third party links

Our site may, from time to time, contain links to and from the websites of our partner networks, advertisers and affiliates. If you follow a link to any of these websites, please note that these websites have their own privacy notices or policies. To the extent any linked websites are not owned or controlled by us, we do not accept any responsibility or liability related to their content, any use of the websites or the privacy practices of those websites. Please check these notices or policies before you submit any personal data to these websites.

#### 12. Contact us

If you have any questions about this notice or our data privacy practices, or wish to exercise your rights, please contact us at FAO: Head of Programmes and Services, Young Enterprise, Coram Campus, 41 Brunswick Square, London WC1N 1AZ, United Kingdom or email us at <a href="mailto:yee-tradingstation@y-e.org.uk">yee-tradingstation@y-e.org.uk</a>.

# 13. Changes to this Privacy Notice

We may from time to time make changes to this notice by posting a new version to our site, please check back frequently to see any updates.