

The VALE Privacy Policy

Last updated: May 4th 2026

The VALE cares about your privacy and about protecting the Personal Data handled by us.

All Personal Data is Processed in accordance with Applicable Law. In this policy, we describe how and for what purposes we use your personal information as well as the legal basis and measures we take to protect Personal Data. We also provide information on how you exercise your rights linked to our use of your Personal Data.

WHY AND WHO

The VALE Association ("The VALE", "we", "us", "our"), a non-profit (Swedish: *ideell förening*) registered in Sweden, decides how and why your personal data is processed, and is responsible for ensuring it is handled in accordance with Applicable Law.

DEFINITIONS

"Applicable Law" refers to the GDPR (EU 2016/679), the Swedish Data Protection Act (dataskyddslagen, 2018:218), and related guidance from the Swedish Authority for Privacy Protection (IMY) or the European Data Protection Board (EDPB).

"Data Subject" is the living, natural person whose Personal Data is being processed.

"Event Participant" refers to a person attending a shorter event organised or co-organised by The VALE, such as a symposium, webinar, or workshop.

"Funder" refers to an organisation that financially supports a project run by The VALE, such as Erasmus+, or other grant-making bodies. Funders may request limited participant data for reporting and verification purposes in line with grant agreements.

"Personal Data" is all information relating, directly or indirectly, to an identifiable natural person.

"Processing" means any operation or set of operations which is performed on Personal data, e.g. storage, modification, reading, handover and similar.

"Project Coordinator" refers to the individual(s) responsible for the day-to-day coordination of a specific project, including managing participant data, travel logistics, and on-site operations.

"Project Participant" refers to a person selected to take part in a multi-day residential project organised by The VALE, such as The VALE Course or The VALE Forum.

"**The VALE Board**" refers to the Board of Directors of The VALE Association, responsible for overseeing data protection practices and approving new data processing tools and procedures.

"**The VALE Team**" refers to all individuals actively contributing to the running of The VALE, including the Operations Team, members of The VALE Board, Project Coordinators, facilitators, and other volunteers with an operational or governance role.

THE VALE'S PROCESSING OF PERSONAL DATA

We have a responsibility to describe and demonstrate how we fulfill the requirements that are imposed on us when we process your Personal Data. This section aims to describe:

- That processing of Personal Data is necessary for the purpose
- That we have identified the lawful basis for the processing

Lawful basis

- **Consent** – The VALE may process personal data if the data subject has given explicit consent in that specific data being processed for a specific purpose. Consent must be freely given, specific, informed and unambiguous, and can be withdrawn at any time.
- **Legitimate interest** – The VALE may process personal data if we have assessed that a legitimate interest overrides the interest of fundamental rights and freedoms of the data subject, and if the processing is necessary for the purpose in question.

PROCESSINGS

1. PROJECT PARTICIPANT APPLICANT

- **Purpose of processing**
For the admissions team to review the body of applicants in order to make a final selection of Project Participants, being able to share future relevant opportunities (courses, events, webinars, etc.), and to maintain anonymised statistical data on the applicant pool.
- **Personal data**
 - a) Specific application content: Name, place of residence, email, affiliated youth organisation, nationality, date of birth, phone number, as well participants' given information about applicants' experiences and background.
 - b) Statistical data: country of residence, gender, nationality and selection outcome (anonymised).

- **Who has access to it**

Only relevant team members in The VALE. In addition, name and email might be shared with Partner Organisations in order to consult on the selection process of applicants from their own organisations (and only on those). Name, date of birth, gender, email, nationality, and city of residence might also be shared with funders upon request.

- **Lawful basis**

Legitimate interest.

- **Storage period**

a) Three years after the project has been finalised.

b) Statistical data: retained indefinitely in anonymised form. Once anonymised, this data is no longer considered personal data under the GDPR.

For data retention relating to applicants who are not selected, see Processing #4.

2. ADDITIONAL PROJECT PARTICIPANT INFORMATION

- **Purpose of processing**

Coordinating travel logistics and reimbursements, as well as ensuring health and safety at on-location, for selected participants. Handling project administration such as invoices and reimbursements. Additionally, to provide requested data for the funders if applicable (e.g. in number of participants with fewer opportunities).

- **Personal data**

This can include dietary restrictions, address(es), passport and/or visa information, banking information, emergency contact, critical health information, accessibility requirements and requests, information on funding of participation and arrangements related to that, funder-specific information requests such as status as a participant with fewer opportunities, and other pertinent information that requires The VALE Team to take specific measures for the participation of this person.

- **Who has access to it**

The VALE Team. Relevant subsets of this data are also shared with venues and accommodation providers as needed for on-site logistics, health, and safety (e.g. dietary restrictions, accessibility requirements). Appropriate parts of this data may also be shared with funders upon request, especially for reporting and auditing purposes. Will be shared with venues, e.g. dietary needs?

- **Lawful basis**

Legitimate interest.

- **Storage period**

Duration of the project.

3. PARTICIPANT & TEAM ALUMNI

- **Purpose of processing**

To maintain records of past participants and VALE team members as a historical archive, to enable The VALE Team to share future opportunities, and to support communication among participants within the same project.

Alumni status applies to Project Participants who attended at least one module and to members of The VALE Association who completed their engagement.

- **Personal data**

For both The VALE Team alumni & participant alumni: Name, email, gender and/or preferred pronouns for communication, affiliated youth organisation(s), project(s) participated in and participation status, and role(s) in the project.

Only for The VALE Team alumni: also nationality, date of birth and phone number(s).

- **Who has access to it**

The VALE Team and participants of the same project.

- **Lawful basis**

Legitimate interest.

- **Storage period**

Indefinitely.

4. NON-SELECTED PROJECT PARTICIPANT APPLICANTS

- **Purpose of processing**

To enable The VALE Team to consider prior applications in the event of a reapplication and to document the outcome of the selection process.

- **Personal data**

a) Basic applicant data: name, country of residence, nationality, email, and selection outcome.

b) Statistical data: country of residence, gender, nationality and selection outcome (anonymised).

- **Who has access to it**

The VALE Board and relevant project teams.

- **Lawful basis**

Legitimate interest.

- **Storage period**

- a) Basic applicant data: ten years after the selection process has been concluded.

- b) Statistical data: retained indefinitely in anonymised form. Once anonymised, this data is no longer considered personal data under the GDPR.

5. ASSOCIATION MEMBERS

- **Purpose of processing**

- To maintain accurate membership records, to track voting rights, facilitate communication with members, share relevant opportunities and updates about The VALE's activities, and to maintain a historical record of the association's membership base – including basic demographic information for organisational reporting and member identification.

- **Personal data**

- a) Basic member data: Name, email(s), date of birth, nationality, country of residence, membership fee payment status, membership period(s), any positions of trust or merits gained in service of the organisation.

- b) Other voluntarily provided data, e.g. address in case of invoicing or mailing something.

- **Who has access to it**

- The VALE Team

- **Lawful basis**

- Legitimate interest.

- **Storage period**

- Indefinitely. If a member resigns or is removed, their record is retained as part of the historical membership archive.

6. THE VALE TEAM APPLICATION

- **Purpose of processing**

- For The VALE Association to review applicants for team roles and make a final selection, to coordinate the application process itself, and to share future relevant opportunities within The VALE with those selected.

- **Personal data**

- a) Specific application content: Name, email, country of residence, nationality, gender,

date of birth, phone number, role applied for, as well as applicants' given information about their experiences, background, and motivation.

b) Statistical data: country of residence, gender, and nationality (anonymised).

- **Who has access to it**

Only relevant team members in The VALE Team , including the The VALE Board and Project Coordinators.

- **Lawful basis**

Legitimate interest.

- **Storage period**

a) Specific application content: three years after the project has been finalised. On termination of engagement, records roll into The VALE Team Alumni (Processing #3) in accordance with that processing's retention rules. If a former team member reapplies, application data is requested anew.

b) Statistical data: retained indefinitely in anonymised form.

For data retention relating to applicants who are not selected, see Processing #7.

7. NON-SELECTED TEAM APPLICANTS

- **Purpose of processing**

To enable The VALE Association to consider prior applications in the event of a reapplication, to share relevant future opportunities with applicants not selected, and to maintain anonymised statistical data on the applicant pool.

- **Personal data**

Basic applicant data: name, email, role applied for, and selection result.

- **Who has access to it**

Only relevant team members in The VALE Team, including the The VALE Board and Project Coordinators.

- **Lawful basis**

Legitimate interest.

- **Storage period**

Basic applicant data: retained indefinitely.

8. THE VALE TEAM – LOGISTICAL INFORMATION

- **Purpose of processing**
Processing personal data about The VALE Team members in order to carry out project coordination, travel logistics, reimbursements, and to ensure health and safety.
- **Personal data**
Name, birthdays, profile photo, nationality, place of residence, phone number, emails, emergency contact, dietary restrictions, virtual call user names, and banking information.
- **Who has access to it**
Only relevant team members in The VALE (for example project coordinators and The VALE Board).
- **Lawful basis**
Legitimate interest.
- **Storage period**
Two years after termination of engagement.

9. THE VALE TEAM – EXTERNAL COMMUNICATION

- **Purpose of processing**
Processing personal data about The VALE Team members in order to promote and communicate about the project in external communication channels.
- **Personal data**
Name, nationality, pictures, video, information about experiences and background.
- **Who has access to it**
Publicly available through The VALE's website, media channels, and relevant publications.
- **Lawful basis**
Legitimate interest.
- **Storage period**
Indefinitely. Historical communications and archive material cannot practically be un-published, and legitimate interest in maintaining the historical record continues beyond individual engagement. Former team members can request removal of specific materials at any time under the rights outlined below.

10. GUEST SPEAKERS/ON-SITE CONTRIBUTORS – INTERNAL USE

- **Purpose of processing**
Coordinating travel logistics and reimbursements, as well as ensuring health and safety at the venues.
- **Personal data**
 - a) Record data: name, nationality, organization, role or topic, and the project or event at which they contributed.
 - b) Operational data: dietary restrictions, banking information, emergency contact.
- **Who has access to it**
The VALE Team.
- **Lawful basis**
Legitimate interest.
- **Storage period**
 - a) Record data: retained indefinitely as part of The VALE Association's historical archive.
 - b) Operational data: deleted after the project has been finalised.

11. GUEST SPEAKERS – EXTERNAL COMMUNICATION

- **Purpose of processing**
In order to promote and communicate about the project in our communication channels.
- **Personal data**
Name, nationality, picture(s), position(s) and other relevant background.
- **Who has access to it**
Publicly available through The VALE's website, social media channels, and relevant publications.
- **Lawful basis**
Legitimate interest.
- **Storage period**
Indefinitely.

12. CONTRACTS AND AGREEMENTS

- **Purpose of processing**
To establish, document, and administer contractual agreements with team members, guest speakers, trainers, and other individuals engaged by The VALE, and to retain these agreements for the period necessary to fulfil legal, accounting, and contractual obligations.
- **Personal data**
Name, personal identification number (personal identity number or equivalent national identifier), address, contact details, banking information, role or engagement, and the terms of the agreement.
- **Who has access to it**
The VALE Board and relevant team members responsible for contract administration.
- **Lawful basis**
Contractual necessity (GDPR Art. 6(1)(b)) and, where applicable, legal obligation (GDPR Art. 6(1)(c)) for compliance with Swedish accounting and tax law.
- **Storage period**
Ten years from the end of the contractual relationship, in line with the general Swedish statutory limitation period for contractual claims (Preskriptionslag 1981:130) and applicable Swedish accounting retention requirements (Bokföringslag 1999:1078, where applicable).

13. EVENT PARTICIPANTS (SHORT-FORM EVENTS)

- **Purpose of processing**
To facilitate the organising of short-form events such as webinars, symposiums, workshops, and public forum sessions, and to share future relevant opportunities with attendees.
- **Personal data**
Name, nationality, affiliated organisation, country of residence, email, connection to The VALE, and dietary requirements.
- **Who has access to it**
Only relevant people in The VALE Team and event collaboration partners.
- **Lawful basis**
Legitimate interest.
- **Storage period**
Dietary requirements will be deleted immediately after the finalisation of the event. The remaining data will be stored for 5 additional years.

14. FINANCIAL SERVICES

- **Purpose of processing**

To administer the Association's finances and keep its books as required by law: receiving and recording membership fees, donations, and grants; issuing invoices and receipts; paying reimbursements and suppliers; reconciling bank transactions; and producing the financial statements and tax filings the Association must prepare. This is carried out through the Association's bank (Handelsbanken) and its own accounting system (Flow).

- **Personal data**

Name, email, address (where provided for invoicing), IBAN and other bank/payment details, payment references; and the amounts, dates, and purposes of money sent to or received from the Association. For reimbursements, also submitted receipts and the related expense details.

- **Who has access to it**

The VALE Board and the team members responsible for financial administration (e.g. the treasurer), and the Association's auditor. Data is processed on our behalf by the accounting system's providers (see Third-Party Processors). The Association's bank, Handelsbanken, processes account and transaction data as an independent data controller under its own terms.

- **Lawful basis**

Legal obligation for compliance with Swedish accounting and tax law (Bokföringslag 1999:1078), and, where applicable, legitimate interest in the sound financial administration of the Association.

- **Storage period**

Seven years, in line with the retention requirement under the Swedish Bookkeeping Act (Bokföringslag 1999:1078).

15. PHOTO AND VIDEO CONFIRMATION

- **Purpose of processing**

To archive the project experience and memories for the participants, to communicate to the external world what we do, as well as to market future projects by The VALE.

- **Personal data**

Name, nationality, pictures, video, audio, and personal testimonials.

- **Who has access to it**

Publicly available through The VALE's website, social media channels, and relevant publications.

- **Lawful basis**
Consent.
- **Storage period**
Indefinitely.

To withdraw consent for photo or video use, contact us at board@thevale.eu. We will remove the relevant material from channels under our direct control within 30 days. Material redistributed or republished by third parties may not be fully recoverable.

16. EMAIL

- **Purpose of processing**
Email correspondence forms part of The VALE's organisational memory. It is processed to facilitate the day-to-day logistics and coordination of projects, to maintain continuity of partner, collaborator, venue, and participant relationships across rotating volunteer teams, to preserve the institutional record of decisions, commitments, and agreements made over the course of The VALE's activities, and to support accountability to funders, partners, and members over the long term.
- **Personal data**
Name, email address, position and other information that might arise in the communication.
- **Who has access to it**
The VALE Team.
- **Lawful basis**
Legitimate interest.
- **Storage period**
Indefinitely

17. DONORS

- **Purpose of processing**
To recognise donors publicly on The VALE's website and communication channels, and to maintain internal records of donations for administration.
- **Personal data**
 - a) Public recognition data: Name and, optionally, organisation/affiliation, and donor tier based on donation amount.
 - b) Internal data: Name, email, donation amount(s) and date(s), and payment

information.

- **Who has access to it**

- a) Public recognition data: Publicly available through The VALE's website and communication channels.

- b) Internal data: The VALE Board and relevant team members.

- **Lawful basis**

- a) Public recognition data: Consent. Can be withdrawn at any time by contacting board@thevale.eu.

- b) Internal data: Legitimate interest.

- **Storage period**

- a) Public recognition data: Until consent is withdrawn.

- b) Internal data: Indefinitely.

YOUR RIGHTS

You are the one in control of your Personal data, and we strive to ensure that you can exercise your rights as efficiently and smoothly as possible.

- **Access** – You always have the right to receive information about the Processing of data that concerns you. We only provide information after having verified your identity to ensure that it is indeed you that are requesting the information.
- **Rectification** – If you find that the Personal Data we process about you is incorrect, let us know, and we will fix it!
- **Erasure** – Do you want us to completely forget about you? You have the right to be forgotten and request deletion of your Personal Data when the Processing is no longer necessary for the purpose for which it was collected. If we are required to retain your information under applicable law or a contract that we have entered with you, we will ensure that it is processed only for the specific purpose set forth in such applicable law or contract. We will thereafter erase the information as soon as possible.
- **Objections** – Do you disagree with our assessment that a legitimate interest for Processing your Personal Data overrides your interest in protecting your privacy? Don't worry – in such cases, we will review our legitimate interest assessment. Of course, we add your objection to the balance and make a new assessment to see if we can still justify our Processing of your Personal Data.
- **Withdraw consent** – If you have given consent to one or several specific processing(s) of your Personal Data, you have the right to withdraw your consent at any time and thus ask us to terminate the Processing immediately. Please note that you can only withdraw your consent for future processing of Personal Data and not for Processing that has already taken place.

How you use your rights

For questions about this policy or to exercise your data protection rights, please contact us at board@thevale.eu. The VALE's Board is responsible for overseeing our data protection practices.

THIRD-PARTY PROCESSORS

We use third-party service providers to help us operate and deliver our activities. These processors only process personal data on our behalf and according to our instructions. Before introducing a new tool or service that may process personal data, we conduct an internal review covering data processing scope, data location, security measures, GDPR compliance, and the provider's data sharing and retention practices.

A current list of our third-party processors, including their purposes and data locations, is available at <https://www.thevale.eu/privacy-policy>.

For data transfers outside the EU/EEA, we ensure that appropriate safeguards are in place, such as the EU-US Data Privacy Framework or Standard Contractual Clauses (SCCs) approved by the European Commission.

We also share limited personal data with participant-affiliated youth organisations and project partner organisations as described in the processing activities above. Data is only shared about participants affiliated with that specific organisation, and project partners are bound by partnership agreements with The VALE.

CHANGES TO THIS POLICY

We reserve the right to make changes to this Policy. In the event that the change affects our obligations or your rights, we will inform you about the changes in advance so that you are given the opportunity to take a position on the updated policy.

CONTACT

Please contact us if you have questions about your rights or if you have any other questions about how we process your personal information:

Email: board@thevale.eu