

The VALE Privacy Policy

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 ("The VALE Team", "we", "us", "our") is the Controller of all Personal Data listed in this Privacy Policy (the "Policy"). In order to be fully transparent regarding where your Personal Data is stored and Processed, we provide a list of all our data Processors.

DEFINITIONS

"Applicable Law" refers to the legislation applicable to the processing of Personal Data, including the GDPR, supplementary national legislation, as well as practices, guidelines and recommendations issued by a national or EU supervisory authority.

"Controller" is the company/organisation that decides for what purposes and in what way personal data is to be processed and is responsible for the Processing of Personal Data in accordance with Applicable Law.

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

"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.

"Processor" is the company/organisation that processes personal data on behalf of the Controller and can therefore only process the Personal Data according to the instructions of the Controller and the Applicable Law.

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 Consent must be freely given, specific, informed and unambiguous, and can be withdrawn at any time.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. PARTICIPANT APPLICATION

- **Purpose of processing**
For the admissions team to review the body of applicants in order to make a final selection of participants as well as being able to share future relevant opportunities (courses, events, webinars, etc.).
- **Personal data**
Name, place of residence, email, affiliated youth organisation, nationality, date of birth, phone number, given information about applicants' experiences and background.
- **Who has access to it**
The VALE Team. 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**
Two years after the project has been finalised.

2. ADDITIONAL PARTICIPANT INFORMATION

- **Purpose of processing**
Coordinating travel logistics and reimbursements, as well as ensuring health and safety at on-location.
- **Personal data**
Dietary restrictions, address, passport information, banking information, emergency contact, and critical health information that requires The VALE Team to take specific measures for the participation of this person.

- **Who has access to it**
The VALE Team.
- **Lawful basis**
Legitimate interest.
- **Storage period**
Duration of the project.

3. PARTICIPANT & TEAM ALUMNI

- **Purpose of processing**
To keep records of past participants and VALE team members, both as a historical record and to be able to contact them about future opportunities.
- **Personal data**
Name, email, affiliated youth organisation, nationality, date of birth, phone number, role in the project, and course completion status.
- **Who has access to it**
The VALE Team.
- **Lawful basis**
Legitimate interest.
- **Storage period**
Indefinitely.

4. 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, YFU organisation, nationality, place of residence, phone number, emails, dietary restrictions, virtual call user names, and banking information.
- **Who has access to it**
The VALE Team.
- **Lawful basis**
Legitimate interest.

- **Storage period**
Two year after termination of engagement.

5. THE VALE TEAM – EXTERNAL COMMUNICATION

- **Purpose of processing**
Processing personal data about The VALE Team members in order to promote and communicate about the course 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.

6. EMAIL

- **Purpose of processing**
Communication with partners, collaborators, venues, participants and team members in order to facilitate the logistics and coordination of the project.
- **Personal data**
Name, email address, job position and other information that might arise in the communication.
- **Who has access to it**
The VALE Team.
- **Lawful basis**
Legitimate interest.
- **Storage period**
10 years.

7. PHOTO AND VIDEO CONFIRMATION

- **Purpose of processing**
To archive the course 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, 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.

8. GUEST SPEAKERS/TRAINERS – LOGISTICAL INFORMATION

- **Purpose of processing**
Coordinating travel logistics and reimbursements, as well as ensuring health and safety at the venues.
- **Personal data**
Name, nationality, banking information, and dietary restrictions.
- **Who has access to it**
The VALE Team.
- **Lawful basis**
Legitimate interest.
- **Storage period**
Two years after the project has been finalised.

9. GUEST SPEAKERS/TRAINERS – EXTERNAL COMMUNICATION

- **Purpose of processing**
In order to promote and communicate about the course in external communication channels.
- **Personal data**
Name, nationality, picture, position and 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.

10. WEBINARS, ONLINE & LIVE EVENTS

- **Purpose of processing**
In order to facilitate the organising of the event as well as being able to share future relevant opportunities (courses, events, webinars, etc.).
- **Personal data**
Name, nationality, email, connection to The VALE.
- **Who has access to it**
The VALE Team and event co-organisers.
- **Lawful basis**
Legitimate interest.
- **Storage period**
Two years after finalisation of event.

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

Contact us at contact@thevale.eu and we will help you.

THIRD-PARTY PROCESSORS

1. **Processor:** Google (Google Drive)
Justification: We use Google Drive for documentation purposes, including handling of all data in the aforementioned processings.
2. **Processor:** Notion
Justification: We use Notion for documentation purposes, including handling of all data in the aforementioned processings.
3. **Processor:** Google (Gmail)
Justification: We use Gmail as an email provider.
4. **Processor:** Participant-affiliated youth organisations
Justification: For participants affiliated with youth organisations, we can share relevant information about the participant with those organisations.
5. **Processor:** The VALE Partner Organisations
Justification: Partner Organisations who have signed a partnership agreement with whom we will share relevant participant information only pertaining to their Organisation.

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:

contact@thevale.eu

or use the contact form below.