

## Balloon Data Privacy Policy and Practice.

### Principles of General Data Protection Regulations (GDPR)

Balloon Ventures (BV) follows the six guiding principles defined by GDPR for organisations who use personal data. These are:

1. **It must be lawfulness, fairness and transparency** - Data should be gathered and used in a way that is legal, fair and understandable. The public have the right to know what is being gathered and have this corrected or removed.
2. **Purpose limitation** - Data should only be used for a legitimate purpose specified at the time of collection. This data should not be shared with third parties without permission.
3. **Data minimisation** - The data collected should be limited only to what is required for the purpose stated. Organisations should not collect data en masse without purpose.
4. **Accuracy** - The personal data we hold should be accurate, kept up to date, and, if it is no longer accurate, should be rectified or erased.
5. **Storage limitation** - Personal data should only be stored for as long as is necessary. Data can be archived securely and used for research purposes in the future. Where possible, the personally identifiable information should be removed to leave anonymous data.
6. **Integrity and confidentiality** - Personal data should be held in a safe and secure way that takes reasonable steps to ensure the security of this information and avoid accidental loss, misuse or destruction.

BV is committed to safeguarding the privacy of those we hold data on, and to do so in an ethical and transparent manner. We believe it is important that individuals have access to and control over how their data is being used. We also want you feel confident that data held by us is stored securely. In this document, we outline:

- What information we collect
- Why we collect information
- How we collect information
- How long we store information
- How we share your information
- How we keep information secure
- How you can contact

#### What information we collect

BV may collect and store a range of information about you. The main categories of information we collect are described below:

- **Identifying details** that you have shared with us, such as your name, date of birth and email address. This information may be used to contact you;

- **Financial details** that we have used to reimburse an expense claim or to pay for work delivered as an employee or contractor;
- **Physical or mental health details** that you have provided as part of the onboarding process for a volunteering programme. This may have been used to assess the suitability of our programme based on your needs, or to safeguard your well-being whilst on a programme.
- **Education and Employment details** that you have submitted as part of an application to volunteer or work with us.

### **Why we collect Information**

We collect data to help us achieve our organisational goals. In practice, this means we may use data for several reasons, such as:

- to safely and professionally deliver programmes;
- to hire the right staff or volunteers;
- to meet our legal obligations and duty of care;
- to contact you with news about Balloon and its development;
- to help manage our online learning platform (Balloon Online).

BV seeks consent before we add people to our newsletter mailing list. We also have a very simple unsubscribe process should individuals no longer want to receive our newsletters (use the link in the bottom of the emails).

### **How we collect information**

We collect information from a range of sources depending on the nature of your engagement with Balloon. In the significant majority of cases, information is collected directly from you. For example, you may:

- submit your email address to receive notifications about Balloon's work or to register for Balloon Online
- send us a CV and/or application form with identifying information when applying for a job or volunteer placement
- share your details with us after participating at an event or workshop

We also collect information when you visit our website, using Google Analytics. This information is collected automatically. It is also anonymised, so your identity is protected.

### **How long we store information**

We store information for different amounts of time depending on the type of information being stored and its purpose. Information will be stored for as long as is necessary to complete our work and the associated activities. For example, we will keep information about volunteers and staff beyond the length of their placement or employment with BV to provide accurate references if requested. We will also store information that is required to comply with relevant regulations and/or regulatory authorities.

You can contact us at any time to request that we remove or amend your personal information. We review archived information and remove what is no longer necessary.

### **How we share information**

BV will **not** share information about you with Third Parties unless:

- it is necessary to ensure our work is delivered in safely and legally
- we have secured your express consent

We do **not** transfer or sell your personal data for marketing purposes.

As BV works in countries other than the UK, there may be a legitimate need to transfer some of your information to countries outside of the European Economic Area. Where this is the case, your information will only be used to fulfil Vital Interests (e.g. reducing health or security risks), Legal Obligations (e.g. for confirmation of identity with work or volunteer permits) and our Legitimate Interests (e.g. to ensure we can monitor the impact of our work). This data will only be accessible to staff who need to see it for one of these purposes and deleted in country at the end of the programme.

### **How we keep your information secure**

BV aims to ensure that any information collected about you is stored and accessed in a systematic, secure and professional manner. Our approach is informed by a commitment to meet all legal requirements, and where possible reflects industry best practice. We do regular reviews to ensure our data protection procedures are fit for purpose and being followed with the appropriate diligence and care.

### **How you can contact us**

If you have any questions about this policy, or would like to exercise any of your data rights, please contact us via any of the following:

Email: [info@balloonventures.com](mailto:info@balloonventures.com)

Phone: 07857664987

Post: 73 Mount View Road, London N4 4SR

### **Further information**

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| <b>Regulations Governing Data Protection</b> | Balloon's data processing is governed by the Data Protection Act 2018 (DPA 2018 and the EU General Data Protection Regulations (GDPR). The Information Commissioners Office governs data protection in the UK and enforces the EU GDPR.                                     |
| <b>Rights of Individuals</b>                 | You have set rights under the GDPR. Your data rights are described below and in the following link: <a href="#">Individual Rights</a> .   |
| <b>Lodging Complaints</b>                    | If you are not satisfied with how your data has been handled and have not received a satisfactory response from us, you should contact the Information Commissioners Office here: <a href="https://ico.org.uk/concerns/handling/">https://ico.org.uk/concerns/handling/</a> |

### Your rights and requests

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| <b>Right to be informed</b>                            | You should be informed of how your data is collected, stored and processed in a clear, accessible way                    | We should provide this in our Privacy Statements and by request               |
| <b>Right of access</b>                                 | You can request access to a copy of your data in electronic form and details of how it is processed                      | we should provide this, for free, within one month                            |
| <b>Right to rectification</b>                          | You are entitled to have your data corrected if it is inaccurate or incomplete   | We should do this within one month, two if it is a particularly complex task  |
| <b>Right to erasure</b>                                | Also known as 'the right to be forgotten', this permits you to request the deletion of your data                         | You should do this within one month, unless you have a strong, valid reason   |
| <b>Right to restrict processing</b>                    | You can request a halt on processing if you object to accuracy or purpose, but we can still hold the data until resolved | We should stop this immediately.  |
| <b>Right to data portability</b>                       | You can request your data in a suitable digital format, sent either directly to you or to a third party                  | We should do this within one month, two if it is a particularly complex task  |
| <b>Right to object</b>                                 | Individuals can, in certain cases, object to the processing of their data, e.g. in direct marketing                      | We should provide reasonable means to object and act on this within one month |
| <b>Rights in relation to automated decision making</b> | You can object to potentially damaging decisions being taken against you based only on automated data processing         | We should allow you to challenge and request human intervention               |

Annual update - December 2019  
Policies apply to the Balloon Group of companies