



The milON Privacy Policy regarding the processing of personal data

24 September 2019

General

milON complies with GDPR, the data protection regulation. This means that we respect your right to feel secure about all your contact with us, your privacy and your right to have control over your personal data. milON places great emphasis on transparency and openness in connection with the collection of personal data. We tell you what data we are collecting, and why. We take great care to protect your data.

This Privacy Policy describes:

- what data we collect;
- why we collect it;
- how you can exercise control over your data, and
- various ways of contacting us.

Our Privacy Policy is applied in all manner of contexts:

- when you register and/or take part in our activities;
- when you visit our website, and
- when you use and communicate with us via, for example, social media, email, phone, an app we have developed, or when you submit your personal data to us in some other way.

Personal data controller

milON is a personal data controller, which means that we have responsibility for processing personal data in the manner described in this policy, and are responsible for ensuring that all such processing is carried out according to the relevant legislation. You can always contact us at milON (see details under the heading 'How to contact us') with any questions and views, e.g. if you want your personal data to be amended or deleted from our registers.

When does milON collect personal data?

milON primarily collects personal data direct from you. Examples of the kind of data collected include names and addresses and contact details, such as phone numbers and email addresses. When you give milON a donation, your national identity number is sometimes registered. Bank account numbers are only saved for people wishing to pay by direct debit. milON may update your personal data with data from public registers or directory enquiries, if this is essential in order to ensure good practice in handling personal data, i.e. ensure that the contact details are genuinely for you.



- when you register interest in our teacher letter, newsletter or similar mailings;
- when you are employed by us, carrying out voluntary work and/or work experience; and
- when we have contact with the media, authorities and/or others affected by our program.

When you apply for a job or work experience at milON, we may also collect information about your background/qualifications. You will also need to provide a copy of a police criminal records check.

How does milON use the data collected?

milON uses the personal data that you have supplied for administration, information and communication purposes, for donor services, ordered services/material and for evaluation and statistics. For example, it could be used for:

milON may use your personal data in our day-to-day operations. E.g.:

- To be able to maintain contact with you when you've been in touch with us.
- In order to contact you about issues relating to our content.
- For financial administration such as invoices, agreements, verification and suchlike.
- So that the personal data of employees or people who perform paid work for us can be used for personnel administration, payroll, etc.
- In monitoring activities and evaluation in internal reporting systems and reports, etc.

Information and marketing

milON may also analyse your pattern of behaviour with our teaching aids, on our website, social media and in other channels, including digital ones, to enable us to develop and improve them and your user experience, for example by making sure we only contact you with information and communications that are of interest to you.

Remember that you can say 'no' to receiving information, marketing and material from milON at any time.

Publication of personal data

milON only publishes your personal data if you have given us your consent. Consent does not always have to be in writing, but should be documented by the organisation. Consent is not required if the publication is covered by the freedom of expression and freedom of information exemption.

Information that may be shared

milON does not sell or lease out any of your personal data. However, milON may share personal data with companies that process data on our behalf, to enable us to offer good service to you and to pursue and develop our program in a way that furthers our purpose and our vision. For example, we may share data with an analysis company, printers and/or IT suppliers. We maintain a high level of security and confidentiality in all processing of personal data.



Lawful bases

milON is careful to ensure that there is a lawful basis for all processing of personal data as detailed below:

- For updating, donor service and marketing, our lawful bases are 'Contract', 'Legitimate interests' and 'Legal obligation'.
- For job applications, work experience applications and suchlike, our lawful bases are 'Legitimate interests', 'Consent' and in some cases, 'Legal obligation'.
- For administration and day-to-day operations, our lawful bases are 'Legitimate interests', 'Legal obligation', 'Contract' and 'Consent'.
- For reports of suspicions that a child has been maltreated, our lawful basis is 'Public task'.
- For certain publications, we use the 'freedom of expression and freedom of information exemption'.

Remember that you can withdraw any consent you have given at any time by contacting us (see heading 'How to contact us'.) In cases where milON uses 'Legitimate interests' as a lawful basis for a purpose, you have the opportunity to object to it.

All processing of personal data is done according to the relevant legislation. This means that personal data should not be kept for any longer than is necessary for the purposes of the processing. milON stores your personal data for as long as you have a relationship with us, for example as an employee, as a donor or as someone who implements our activities/users of our services and our material. Subsequently the personal data will be managed and saved depending on the purpose. Data may be deleted if it is no longer current or necessary for analyses or direct communication for the purposes for which it was collected. We maintain a high level of security and confidentiality in all processing of personal data.

Your rights

You are entitled to know what data milON has registered about you, i.e. you have the right to make a 'subject access request'. If you would like to make such a request, you need to send it in writing to milON (see heading 'How to contact us'). Your request can be made by ordinary mail or digitally. However, the copy of your personal data can only be sent to your registered home address. milON must either at its own or at your request rectify any inaccurate information, delete data or change the way the personal data is used.

You can at any time refrain from receiving our direct communication, such as the newsletter or offers via various channels, by for example clicking on 'unsubscribe' in the email message and/or text message we send you. If you want to stop receiving all communication from milON, you can contact us for help with this (see below).

How to contact us

Would you like further information about milON's personal data management, would you like to make a subject access request or do you have any other questions? Contact us at milon@psd.pal.