

## Privacy Policy

### ABOUT US

The Big Green Prize Company Limited (“we”, “our”, “us”, “our”) company number 13392114, registered in England and Wales, registered address, Kemp House, 160 City Road London, EC1V 2NX, respect the privacy of our website users, readers and customers (“you”) and we recognise the need for appropriate protections and management of your personal information.

When we, and our service providers, collect and use your personal information we are the data controller for the purposes of Data Protection Legislation (defined below).

We and our service providers do not collect and Special Category Data.

We have prepared this Privacy Notice to assist you in understanding what information we collect about you and how that information is used by us and by third parties.

### KEY TERMS

**Data Protection Legislation** refers to the General Data Protection Regulation (Regulation (EU) 2016/679) (“GDPR”); the Data Protection Act 2018 and any legislation implemented by the UK to give effect to the derogations permitted under the GDPR.

**Personal Information** is information that can be used to identify or contact a specific individual, such as a name, address, telephone number, email address, etc., and online identifiers and location data such as IP addresses and mobile device IDs.

**Special Category Data** means personal information revealing your racial or ethnic origin; political opinions; religious or philosophical beliefs; trade union membership; genetic data; biometric data; data related to your health or data concerning your sex life or sexual orientation; and criminal convictions or involvement in criminal proceedings.

**A Data Controller** is someone who decides why personal data is to be collected and how it will be used and treated.

### CONTACT US

If you have any questions regarding the Privacy Notice, or are unhappy with how we handle your personal information, you can contact us by email at [legal@biggreenprize.com](mailto:legal@biggreenprize.com) or by writing to us at Kemp House, 160 City Road London, EC1V 2NX, and/or notify the Information Commissioner’s Office (ICO)

If you are unhappy with how we handle your personal information you can write to us using the contact details noted above; and / or notify the Information Commissioner’s Office (ICO) via [ico.org.uk/make-a-complaint](https://ico.org.uk/make-a-complaint).

Based on our current purposes for the data we collect the ICO has indicated we do not need to register and pay a fee.

### HOW DO WE USE YOUR PERSONAL INFORMATION?

**Information you provide to us when you contact us:** this may include your name, address, contact details and any other personal information which you choose to provide to us (or which we otherwise obtain as part of that process (such as an IP address)).

Reason: If you contact us to enquire about any aspect of our business, goods or services, we will collect your personal information in order to respond to your query and we may also use your information where there is another legitimate reason for us to do so.

Permitted: On the basis of our and your legitimate interests. Our interests being that we would like to assist you with any queries you may have and inform you about our goods and services.

Retention: We will retain this information for no longer than necessary for the uses set out in this Privacy Notice, or while there is a legitimate interest for us doing so. If during our correspondence with you, you enter a contract with us or consent to direct marketing, please see the relevant section of this table for details as to how we will use your personal information.

Reason: Where you contact us by phone, we may record the conversation in order to allow us to maintain a record of our conversation which we can return to if we need to check any of the queries which we are to respond to you on, for the purposes of training and improving our services, and for security. You will be notified at the beginning of the call if it is being recorded.

Permitted: On the basis of our and your legitimate interests. Our interests being that we wish to improve our services and ensure we respond fully to your queries.

Retention: We will retain this information for no longer than necessary for the uses set out in this Privacy Notice, or while there is a legitimate interest for us doing so.

Reason: If you contact us in relation to applying for a job with us, we will collect your personal information in order to assess whether you are suitable for the position you applied for.

Permitted: On the basis of our and your legitimate interests. Our interests being that we would like to consider you for the position you applied for.

Retention: If your application is unsuccessful, we will delete this information within 12 months of receiving your application. If your application is successful, we will issue you with a further privacy notice in relation to the retention and use of your personal information.

**Information you provide to us when you enter a contract for our services, for example, entering a prize draw:** this may include: your name, address, other contact details, payment information, the details of the prize draw, where and how you came to know of our prize draws, and charities you support.

Reason: If you enter a contract with us to provide you with any of our goods or services, we will collect your personal information to enable us to provide those goods or services to you (for example to receive payment for the services or to contact you in relation to the event you are attending) and we may also use your information where there is a legitimate reason for us to do so.

Permitted: On the basis that this is necessary to fulfil our contractual obligations to you; and On the basis of your and our legitimate interests. Our interests being that we would like to assist you with any queries you may have and inform you about our goods and services.

Retention: We will retain this information for the duration of our contract with you. Once our contract has ended we will retain your personal information for up to six years in accordance with relevant legal and accounting requirements.

**Information that we collect about you when you sign up to our newsletters or direct marketing services:** this may include your name and contact details.

Reason: Where you sign up to our newsletters or other direct marketing communications, we will collect your personal information in order to be able to send you these newsletters or communications, or where there is another legitimate reason for contacting you.

Permitted: We will collect this information and contact you in this way on the basis of your consent for us to do so. We will thereafter contact you on the basis of your and our legitimate interests. Our interests being that we would like to inform you about our services and the charities we support. You may withdraw your consent to this type of communication at any time by contacting us or clicking on the unsubscribe button.

Retention: We will check whether you wish to continue receiving communications of this nature at least every 12 months. You will be able to respond by requesting to opt out clicking on the unsubscribe button. You will be able to If you do not respond, we will contact you again within two weeks after our first communication to check whether you wish to opt out. If we still do not receive a response, we will delete your personal information within one month of this second attempt to contact you.

**Information that we collect about you by way of cookies.** This includes your IP address, browser type and operating system.

Reason: We collect this information in order to improve your experience of using our website and to enable us to assess how our websites are used to ensure our services and advertisements are relevant. For further information in relation to cookies, please see the cookies information link displayed in the footer of each of our websites which you visit.

Permitted: On the basis of our and your legitimate interests. Our interests being that we wish to improve our services and allow you to interact and engage with our websites and services. We will use cookies only on the basis of your prior consent. Please see our cookies information link which is displayed in the footer of each of our websites to review the types of cookies which you have consented to. Other than cookies which are strictly necessary for the functioning of our website, we will use cookies only on the basis of your prior consent. Please see our cookies information link which is displayed in the footer of each of our websites to review the types of cookies which you have consented to.

Retention: Please see our cookies information link for further information.

## **UPDATING YOUR PERSONAL INFORMATION**

Please contact us at [admin@biggreenprize.com](mailto:admin@biggreenprize.com) as soon as possible after there is any change to your personal details, including your contact details.

## **SHARING YOUR PERSONAL INFORMATION**

We contract with third party service providers and suppliers to deliver certain services. We have contractual arrangements in place with each of these providers so that they are obliged to protect your personal information.

The following third parties may have access to your personal information for the purposes noted below:

- Software providers: we use a range of software providers in order to administer our business, these providers include the host of our website, the providers of our call recording system, email system, automated email marketing system and customer databases.
- Service providers: we use a range of service providers in order to effectively operate our business, for example providers of online payment service and online supporter management and subscription services.
- Event organisers: where we hold events, we may share your personal information with third party organisers of the event including caterers and venues, for example, we may share your name with the venue for the purposes of administering a guest list.
- Prize providers: where you enter one of our prize draws, we may share your information with the third party who is supplying the prize to ensure they are able to provide you with any prize that you may win.
- Cookies providers: for example, Google Analytics, please see our cookies information link for further information.
- any other person who is authorised to act on your behalf;
- regulators, government departments, law enforcement authorities, tax authorities, accountants, insurance companies, lawyers and other professional advisers;
- any relevant dispute resolution body or the courts; and
- persons in connection with any sale, merger, acquisition, disposal, reorganisation or similar change in our business.

Some of these entities may also be data controllers under the Data Protection Legislation. However in the first instance you should contact us using the contact details above if you have any queries.

Except as provided above, we will not share personal information with any other third parties without informing you beforehand, unless required by, or in connection with, law and / or regulatory requirements.

We will not sell, trade, or lease your personal information to others.

## **EUROPEAN ECONOMIC AREA**

The information we collect from you may be stored inside the UK, the European Economic Area ("EEA") or outside the EEA.

If you live or work outside of the UK or the EEA, we may need to transfer your personal information outside of the UK or the EEA to correspond with you. Where this applies, we will take all steps reasonably necessary to ensure that your personal information is treated securely and in accordance with this privacy notice.

We also transfer personal information outside the UK or the EEA where our service providers host, process, or store personal information outside the UK or the EEA. Where this is the case we use contractual arrangements and safeguards to protect this personal information, these safeguards include:

- The country to which the personal information will be transferred has been deemed to provide an adequate level of protection for personal information by the European Commission. For further details, see [European Commission: Adequacy of the protection of personal data in non-EU countries](#).
- Where we use certain service providers, we may use specific contracts approved by the European Commission which give personal information the same protection it has in Europe. For further details, see [European Commission: Model contracts for the transfer of personal data to non-EU countries](#).
- Where we use providers based in the US, we may transfer personal information to them if they are part of the Privacy Shield which requires them to provide similar protection to personal information shared between the EEA and the US. For further details, see [European Commission: EU-US Privacy Shield](#)

Please contact us if you want further information on the specific mechanism used by us when transferring your personal information out of the EEA.

## **YOUR RIGHTS**

You have certain rights under the Data Protection Legislation which can be exercised by contacting us at [legal@biggreenprize.com](mailto:legal@biggreenprize.com) including:

- the right to access the personal information held about the you by making a subject access request in accordance with the Data Protection Legislation. We may charge a reasonable fee when a request is manifestly unfounded or excessive;
- the right to have your personal information rectified if it is inaccurate or incomplete;
- the right to request to have your personal information deleted in certain specific circumstances as set out in the Data Protection Legislation;
- the right to request to restrict the processing of your personal information in certain specific circumstances as set out in the Data Protection Legislation;
- the right to ask us not to process your personal information for marketing purposes or for purposes based on our legitimate interests;
- the right to ask us to not undergo automated decision making; and
- where you have provided consent, to request to withdraw such consent at any time.

Please note that if you choose to exercise your rights to have personal information restricted or deleted, then we may not be able to provide you with our services.

Further details about your rights can be found on the ICO's website [ico.org.uk](http://ico.org.uk)

## **UPDATING OUR PRIVACY POLICY**

We may update or amend this privacy policy from time to time, including in order to make clarifications or modifications to it or to reflect changes to legislation. Any changes to this privacy policy will be posted here and such changes will become effective as soon as they are posted.