

## PRIVACY POLICY

This Privacy Policy governs the processing of personal data of participants (hereinafter the "**Participant**" or "**Participants**"), which may be gathered by the entities detailed below, as joint controllers, in the context of the participation the Youth Challenge (hereinafter the "Challenge"), which is a part of the project "People and Planet: A Common Destiny" (hereinafter the "Project"). The latter is a project of 17 NGOs located in the EU and Cape Verde, and is co-funded by the European Union and Camões I.P. under the DEAR Programme (Education and Awareness Raising) and aims at mobilizing youth citizens and glocal authorities in the fight against climate change. The project is implemented in 8 EU Member-States and Cape Verde during, between 2020 and 2024.

The following entities are the ones, as joint controllers, processing, in each applicable jurisdiction, the personal data of the Participants:

- For Participants submitting personal data in **Portugal** and **Cape Verde**: (i) Câmara Municipal de Loures; (ii) Instituto Marquês de Valle Flôr, with head office at Rua de São Nicolau, 105, 1100-548 Lisbon and with the identification number of the collective person 501 066 055 ("IMVF").
- For Participants submitting their personal data in **Spain**: (i) Fondo Gallego de Cooperacion e Solidariedade.
- For Participants submitting personal data in **Germany**: (i) (FINEP) Forum für Internationale Entwicklung + Planung; and (ii) Dornstadt Municipality.
- For Participants submitting personal data in **Ireland**: (i) (SLÍ) Waterford Sustainable Living Initiative.
- For Participants submitting personal data in **Italy**: (i) We World G.V.C.Organizzazione non Lucrativa di Utilità Sociale; and (ii) (FELCOS Umbria) Fondo di Enti Locali per la Cooperazione decentrata e lo Sviluppo umano sostenibile.
- For Participants submitting personal data in the **Netherlands**: (i) Maastricht Municipality; and (ii) Zoetermeer Municipality.
- For Participants submitting personal data in **Poland**: (i) (BRF) Fundacja Kupuj Odpowiedzialnie (Buy Responsibly Foundation).
- For Participants submitting personal data in **Romania**: (i) (Agenda 21) Association Assistance and Programs for Sustainable Development; and (ii) Braşov Municipality.

Providing your personal data implies your knowledge and acceptance of the terms and conditions of this Privacy Policy.

This Privacy Policy must be read together with the Terms and Conditions of the Challenge available [here](#).

Participants can find more detailed information with respect to this Privacy Policy and Cookie Policy on the following matters:

1. **Who are we?**
2. **Collection and processing of personal data**
3. **How long do we keep your information?**
4. **Sharing of Personal Data**
5. **Participant's rights**
6. **Security**
7. **Cookies**
8. **Miscellaneous**

This global Privacy Policy describes how the above joint controllers collect, use, protect and share the Participants' personal data in each applicable abovementioned country.

The following terms and conditions apply solely to Participants submitting their personal data in the Portuguese territory:

## **WHO ARE WE?**

Your data will be processed by Instituto Marquês de Valle Flôr – a Non-Governmental Development Organization based in Lisbon, Portugal –, with head office at Rua de São Nicolau, 105, 1100-548 Lisbon, registered in the Commercial Registry Office of Lisbon under the single registration and Corporate Body number 501 066 055 (hereinafter referred to as "IMVF").

IMVF will act, under the terms best defined in the General Regulation on Data Protection (Regulation (EU) 2016/679 of the Parliament and of the Council of 27.04.2016) (hereinafter only referred to as "RGPD"), as Joint Controller, undertaking to fully comply with the legislation in force at all times.

## **COLLECTION AND PROCESSING OF PERSONAL DATA**

When Participants, located in Portugal, register their participation on the website concerning the Challenge, IMVF processes the following categories of personal data the Participants freely choose to provide:

- a) Identification data (name, date of birth, address, citizen's card data, tax number, contact details, nationality);
- b) Recorded image and sound data (photographic and video images).

Within the scope of the Challenge, for the purposes of managing your participation, awarding prizes, publicizing, and promoting the contest, preventing fraud, and managing questions and complaints, we process the following personal data:

- i. To validate and assess the eligibility of Participants for participation in the Challenge and the awarding of prizes, IMVF will process the following information according to the conditions set forth in the Challenge's [Terms & Conditions](#), namely, date of birth, address and nationality.
- ii. By entering the Challenge, Participants who are awarded the Prize understand that their name (first and last only) will be used, published and reproduced by IMVF at the Project sites and related social media networks, as well as your voice and/or image for disclosure in any type of advertising, promotion, publication, including the Internet or any other medium, for commercial or informational purposes, in particular for the purpose of communicating the award of the prize, it being understood that such use, publication or reproduction shall not give rise to any payment by IMVF to the Participant or any individual participation in the video submitted by the Participant, under the Terms & Conditions of the Challenge. If the Winner is a minor, a declaration of image rights shall be signed by the holder of parental responsibilities by providing elements that prove his identity, accompanied by a photocopy of the minor's identity card/citizen card;

Without prejudice to the fact that by participating in the Challenge the Participants grant their consent to the treatment of their image and voice, they acknowledge, accept and declare that the treatment of the same is based on the management of their participation in the Challenge, being their availability an essential requirement for participation. The withdrawal of consent does not compromise the lawfulness of the processing carried out on the basis of the consent previously given.

- iii. In order to manage the delivery of prizes, it will be necessary to process some personal data of the prize winners, namely (i) copy of citizen card; (ii) name and address for sending prizes and (iii) cell phone number related to the winning Participant for contact purposes (sending sms and telephone contact) to enable the organization and management of the delivery of prizes.

Participants declare that they accept and authorize that their data (name, address and citizen card number) may, depending on the prizes to be awarded, be shared with the partners in charge of delivering the respective prizes. The Partner will ask the Winning Participant to provide these identification and contact details and to show his identity card to prove his identity as a Winner, and may request the necessary personal information to complete and sign the prize delivery declaration, as mentioned above. The processing of this data by the partners will be carried out under their exclusive responsibility and in accordance with the privacy policies of each partner. Please check in advance the Partners' Privacy Policy to learn how they treat your data.

- iv. The data of Participants and awarded Participants will also be processed for the purpose of preventing and detecting fraud, as well as responding to questions and complaints, based on the legitimate business interest of IMVF.

All Participants declare that they are aware that the data processing referred to herein is necessary for the aforementioned purposes.

Notwithstanding any of the above, for clarification purposes, the Participants accept and acknowledge that only the videos of the awarded Participants (both under national and international winners) are stored by IMVF or any other Joint Controller. All remaining videos are only visualized by the Joint Controllers, under a territory criteria, through the social media shared link provided by the Participant.

Participants are liable for the accuracy of the data provided and IMVF shall always be entitled to rule out from the Challenge any Participant that provided false information, without prejudice to any other legal consequences.

Shall you provide us with third party data, you must guarantee that you obtained their previous consent to provide such data to IMVF, for the abovementioned processing purposes. In any case, should any change on your personal information occur, IMVF hereby requests you to communicate such changes, so that we can maintain your information updated. Therefore, you bound yourself to provide truthful personal information and to maintain such information provided to IMVF updated.

Under the provisions of the RGPD, the processing of personal data is only lawful if supported by any of the legal grounds expressly provided therein. Depending on the purpose for which we process your data, the legal basis for processing your data may be:

- Our legitimate interest, better exemplified above;

- Your consent, as detailed above;
- Contract performance;
- Legal basis.

IMVF assumes that the data collected during registration was entered by the respective holder and/or that its insertion was authorized by the same or by the holders of parental responsibilities, being the same true, current, and accurate.

## **HOW LONG DO WE KEEP YOUR INFORMATION?**

Our policy is to keep your data only as long as necessary to achieve the purposes for which they were collected.

Participants' personal data will be processed exclusively for the purposes of the Challenge, and will be kept for a maximum of 12 months after the conclusion of the contest and, in the case of prize-winning participants, after the awarding of the prize, and will be deleted after this period has elapsed.

## **SHARING OF PERSONAL DATA**

We do not sell your personal information under any circumstances, nor do we share it with third parties for advertising/promotion purposes.

Only IMVF authorized personnel and the joint controllers of the Project have access to it for the purpose of project management.

IMVF may use subcontractors to process all or part of your personal data, in the terms permitted by law, namely advertising and marketing agencies. These entities are obliged under the terms of the contracts entered into, to keep confidential and guarantee the security of the data to which they have access, and may not use such data for any other purposes, nor link it to other data held by them.

The transfer of data to third parties is carried out in accordance with the applicable data protection legislation and within the limits of the purposes and lawful bases established in this Privacy Policy. IMVF will not transfer your personal data outside the open Union or the European Economic Area, nor will it allow its subcontractors to do so.

## **PARTICIPANT'S RIGHTS**

Participants, as data owners, may request, in writing, access and portability of data that directly concern them, as well as request its correction, deletion or limitation of its treatment. Additionally, Participants also have the Right of Opposition, which means that in certain cases they can oppose to the processing of their personal data at any time, for reasons related to their particular situation or when they are processed in a direct marketing context. Data processing for direct marketing purposes will not be carried out by IMVF within the scope of the Challenge.

Participants may exercise the rights indicated in the previous point or request any clarification regarding the processing of their data within the context of the Contest, by contacting IMVF's Data Protection Officer at [insert e-mail address]. If you wish to

exercise any of these rights and/or have more information about them, the way in which we process your data or file a complaint, you must send an email to our Data Protection Officer at [insert e-mail address].

Without prejudice to any other administrative or judicial means and recourse, participants are entitled to submit a complaint to the Portuguese National Data Protection Commission ("CNPd") or to another competent supervisory authority, namely in the Member State of their habitual residence, place of work or in the country where the violation of the legal regime occurred, pursuant to article 77 of the GDPR.

## **SECURITY**

IMVF endeavours to protect Participant' personal data from unauthorised access. To this end, it makes use of security systems, rules and other procedures, in order to ensure the protection of personal data, as well as to prevent unauthorised access to, improper use of, disclosure, loss or destruction thereof.

It is, however, Participant's responsibility to guarantee and ensure that the equipment used to access the website is appropriately protected against damaging software, viruses and worms.

## **COOKIES**

IMVF is entitled to use Cookies as part of facilitating the process and also operate its services through its Webpage. Cookies are small files (text files) sent and kept in the user's computer, allowing webpages, like the present, to function uneventfully devoid of any technical problems, collect multiple choices made by the user, recognize frequent users, facilitate their access to each webpage and collect information that can improve the content of the Webpage. Cookies do not cause damage either to the user's computer or to the files stored in it.

## **MISCELLANEOUS**

IMVF reserves the right to, at any time, change the current terms of the processing of personal data. Such changes shall be duly disclosed on the Website.

Any disputes arising from the validity, interpretation or execution of this Privacy Policy, or that are related to the collection, processing or transfer of our Participant' personal data, must be submitted exclusively to the jurisdiction of the judicial courts of the district of Lisbon, without prejudice to the applicable mandatory legal rules.