

The Duke of Edinburgh's Award Foundation Bangladesh Privacy Notice

Introduction:

The Duke of Edinburgh's Award Foundation Bangladesh (the “**The DEA-BD**”, “**we**”, or “**us**”) is registered in Bangladesh under Trust (Registration number 21631-VI-63-06). We are committed to keeping your personal information safe and meeting our responsibilities under privacy law.

This Privacy Notice describes how we collect and use personal information about people the DEA-BD engages and works within our existing network, and those that visit our digital sites (including but not limited to the Online Record Book, and the Award Community). This includes, but is not limited to, personal information relating to award leaders, award centres, participants, and volunteers.

[Any organisation or person licensed to administer, manage, or coordinate the Award in Bangladesh (including without limitation award centres, operating partners, and volunteers) must comply with this Privacy Notice.]

If you have any questions regarding your personal information, please contact us using the Contact Details given below in section 9.

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1. The type of personal information we collect:

- 1.1. Personal information is any information that relates to an individual. It does not include information where the identity of the individual has been fully and effectively removed (anonymous data).
- 1.2. Under data protection legislation, certain personal information is considered more ‘sensitive’ (e.g., information relating to race, religion, political affiliation, and health). This is also known as ‘special category data’. In certain circumstances, the DEA-BD may collect special category data about individuals. For example, you may be asked to provide information on your ethnic origin when registering for the Online Record Book or when completing a research survey (though you are not obliged to do so). This information is typically not used on an individual basis, but to help with research or to analyse the impact of funding or other positive interventions.

2. Where we get your personal information:

- 2.1. The DEA-BD generally collects personal information directly from the relevant individual or their authorised intermediaries, for example when you sign up to one of our services or otherwise engage with us.
- 2.2. We may collect personal details about you that are available on Online Record Book and Award Community.

- 2.3. We have set out further details about what personal information we collect and why in Section 3 below.

3. Why we collect and use your personal information and our lawful bases:

- 3.1. The DEA-BD generally collects personal information in order to manage, administer, record and support the delivery of the Duke of Edinburgh's International Award (the "**Award**").
- 3.2. Below we have outlined the different processes where personal information is collected, what type of personal information is collected, how this information is obtained and processed, the purpose for collecting the information and on what lawful basis:

Process	What	How	Purpose/Why	Lawful basis
Training courses & recording of delegate information	• First Name • Last Name • Email Id • Phone Number • Award Centre	• Via Email • Award Community	• To monitor the number of individuals who have completed online courses to fulfill licence requirements. • To issue training certificates to individuals.	1. We have a legitimate interest to effectively deliver training courses and the Award as a whole.
Award Community	• First Name • Last Name • Email Id	• Self-registration form on the Award Community site.	• To access information and communications to support the delivery of the Award. • To access the self-paced online training courses. • To maintain a record of online training that has been completed by adults in the Award.	2. We have a legitimate interest to effectively deliver the Award.

Online Record Book (ORB) – Participants	Required: • First Name • Last Name • Email Id • Date of Birth • Address • Parent/guardian's Name and Email Id • Details of participants' Award record and achievements. Optional • Gender • Nationality • Employment Status • Profile Picture • Profile Questions <i>(these vary between Operators)</i>	• Self-registration form on the ORB.	• The ORB profile needs to be identifiable to the person whose profile it is and so name and email Id is required. • Awards have age limits for participation and including date of birth can help manage this. • To maintain a record of participants in the Award and Award Centres and to communicate about the Award where necessary. Information may be used to aid programme analysis, Award Delivery, and for communication where necessary.	1. We have a legitimate interest to process this data in order to be able to operate the ORB.
Online Record Book (ORB) – Adults in the Award	• First Name • Last Name • Email Id • Date of Birth • Address • Gender (optional)	• Self-registration form on the ORB.	• The ORB profile needs to be identifiable to that person and so name and email Id is required. • Award. Operators have age limits for Award Leaders and including date of birth can help manage this. • To enable users to manage and support their participants or Award Centres in order to deliver the Award. • To maintain a record of adults in the Award and Award Centres. Information may be used to aid programme analysis, Award Delivery, and for communication where necessary.	1. We have a legitimate interest to process this data in order to be able to operate the ORB.

3.3. In addition to the above, we may use your personal information:

3.3.1. To inform you of Award programme news, activities, and events. You can unsubscribe from our email communications by following the instructions in any email that we send you, or you can withdraw your consent and request us to remove your personal information at any time by emailing us at <info.dofebd@gmail.com>.

3.4. We do not carry out any automated decision-making using personal information which produces legal effects or otherwise significantly affects individuals.

4. How we use and disclose personal information:

4.1. The DEA-BD limits its use and disclosure of personal information to the purpose for which it was collected and other related purposes that would be expected by you.

4.2. The DEA-BD never discloses personal information to third parties.

5. How we store and retain your personal information:

5.1. All personal data collected and processed is securely stored in the DEA-BD's internal drives or databases including but not limited to the Database, Award Community, Online Record Book (ORB), and Hardcopy.

5.2. The Duke of Edinburgh's Award Foundation Bangladesh will take reasonable steps to ensure there are appropriate technical controls to protect the personal information it holds from misuse and loss and from unauthorised access, modification, or disclosure. While we seek to use appropriate organisational, technical and administrative measures to protect personal information within the DEA-BD, unfortunately, no data transmission or storage system can be guaranteed to be 100% secure. If you have reason to believe that your interaction with us is no longer secure, please immediately notify us in accordance using the information set out in the Contact Details section below.

5.3. The DEA-BD will only store personal information for the period of time that is necessary in light of the purposes for which we collected the personal information. The criteria we use to determine the retention period of personal information are: (i) the respective statutory retention period; (ii) our contractual and/or business relationships with you; (iii) (potential) disputes; and (iv) any guidelines issued by relevant regulators. After expiration of that period, the relevant information is routinely deleted, as long as it is no longer necessary for the fulfillment of a contract, the initiation of a contract or to protect or defend our position or that of a third party. If you have any questions about our retention periods, please contact us at <info.dofebd@gmail.com>.

5.4. After the expiration of appropriate retention periods, the DEA-BD will take reasonable steps to destroy or permanently de-identify the relevant personal information. The DEA-BD undertakes regular reviews of who has access to information that we hold to ensure that your information is only accessible by appropriately trained staff.

6. Your rights:

6.1. Your data protection rights under data protection law are as follows:

Your right of access – You have the right to ask us for access to the personal information we hold about you.

Your right to rectification – You have the right to ask us to rectify personal information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete.

Your right to erasure – You have the right to ask us to erase your personal information in certain circumstances.

Your right to restriction of processing – You have the right to ask us to restrict the processing of your personal information in certain circumstances.

Your right to object to processing – You have the right to object to the processing of your personal information in certain circumstances.

Your right to data portability – You have the right to ask that we transfer the personal information you gave us to another organisation, or to you, in certain circumstances.

Consent – Where we have previously obtained your consent, to withdraw that consent to processing your personal information.

6.2. To exercise these rights, contact us using the details set out in section 9 below. You are not required to pay any charge for exercising your rights. If you make a request, we have one month to respond to you. However, please be aware that the DEA-BD may be unable to provide these rights to you under certain circumstances, for example if we are legally prevented from doing so or can rely on exemptions.

6.3. You also have the right to lodge a complaint against the DEA-BD, which you can do by contacting us via email at <info.dofebd@gmail.com>.

7. Complaints:

7.1. If you believe that the DEA-BD has not complied with this Privacy Notice with respect to the handling of your personal information, please contact the DEA-BD using the details in section 9.

8. Other websites:

Our website may contain links to other websites. Please note that when you click on one of these links, you are entering another website for which the DEA-BD has no responsibility (even if you access the website via a link to one of our websites). We encourage you to read the privacy notices on all such websites.

9. Contact details:

9.1. Any individual who has a question or complaint about how the DEA-BD handles their personal information or who wishes to access or correct the personal information that the DEA-BD holds about them should contact:

Via email : <info@deabd.org>

Via post : The Duke of Edinburgh's Award Foundation Bangladesh
House:422 (2nd floor), Lane: 7 (East)
Baridhara DOHS, Dhaka Cantonment
Dhaka-1206, Bangladesh