

The Huawei SmartBus Privacy Notice

In this privacy notice, the terms "**we**", "**us**" and "**our**" mean Insight SA. We are a leading provider of educational programmes and tools that empower young people as responsible digital citizens, and we are the Controller in respect of any personal information collected as part of the Huawei SmartBus project.

This privacy notice sets out how we collect and use information about you when you attend a SmartBus event. A summary of this notice has been prepared for young people and is also available.

Please read this privacy notice carefully to understand how we will use your personal information. If you have any questions or queries in relation to this privacy notice, you can contact us in the following ways:

Email: info@insight2act.net
Post: Insight SA, 41 Rue de Cessange, Luxembourg 1320
Phone: +324 840 57513

This privacy notice explains:

1. Information we may collect about you
2. How we use your information
3. Contacting you
4. Sharing your information
5. Our legal basis for collecting, holding and using your information
6. Security and storage of your information
7. Your rights

1. Information we collect about you

- The SmartBus project has been specifically designed to minimise the amount of personal data that is collected from participants.
- In order to attend a SmartBus event, parental consent will be obtained through the host school. These consents will be obtained and kept by the host school. No one else involved in the project will have access to them.
- We will not generally collect any personal data about students attending a SmartBus event. Any activities that students undertake at a SmartBus event are done anonymously and we do not collect personal information from them.
- The only personal data we will collect as part of the SmartBus project relates to photos and videos. We would like to take photos and videos at SmartBus events to highlight the project, publicise events and include in the final report for the project. We will ask the host school to agree and we will ask parents or guardians to sign an image consent form prior to the event. We will not take any images unless we have received consent from the school and for each student taking part. We will retain the information on completed image consent forms so that we can be sure that appropriate consent has been given.
- We have developed a survey about internet usage which is designed to be completed by parents, teachers and students prior to SmartBus events. The survey has been designed to be completed anonymously and so we do not expect any personal data to be included. None of the information gathered will be directly attributed to any specific participant.
- We will not receive information about you from other organisations.

2. How we use your information

- We may use photos and videos from SmartBus events in publicity materials for the SmartBus project, including social media posts, as well as for the final report we will prepare at the end of the project.
- We will use the anonymous information gathered from surveys and activities in order to tailor the content of the SmartBus project and to feed into a report about the project. Survey responses cannot be linked to individuals.

3. Contacting you

- All communication and arrangements in connection with SmartBus events will be directly between schools and us. We do not collect contact details for individuals and we will not use your personal information to contact you.

4. Sharing your information

- Images taken at a SmartBus event may be shared with LEF Marketing and Events, Forum Europe Ltd (trading as Forum Europe and Forum Global) and Huawei for use in communications and publicity materials relating to the SmartBus project.
- Unless we are under a legal obligation to disclose or share your personal information, we will not otherwise share personal information with third parties.
- The SmartBus event partners, including Huawei, LEF Marketing and Events and Forum Europe Ltd (trading as Forum Europe and Forum Global) will not receive or otherwise have access to any personal information. Anonymous information derived from the survey will be shared with these organisations.

5. Our legal basis for collecting, holding and using your information

- Data protection law sets out various lawful legal bases (or 'conditions') which allow us to collect, hold and use your personal information.
- We will process the personal data contained in photographs and videos because it is in our legitimate interests to do so. It is in our interests to publicise the SmartBus project and to be able to show images of the events. We will only use images which could identify individuals if an appropriate image release form has been completed. If you do not wish yours or your child's image to be used by us, you do not need to complete the image release form. This will not prevent your (or your child's) attendance at the SmartBus event.
- Data protection law recognises certain "special categories" of personal information considered particularly sensitive. We do not anticipate collecting any special categories of data. However, if you wish to tell us about any special requirements that you (or your child) may have prior to attending an event, we will retain these in order to ensure that the SmartBus event is fully accessible. We will only use this information if you have given us your explicit consent or where we consider it necessary to do so in order to comply with our legal obligations.

6. Security and storage of your personal information

- We will keep your personal data securely stored. We do not anticipate that the information we collect about you will be transferred to, or stored at, a destination outside the European Economic Area (**EEA**).

- We will keep personal information about you no longer than is needed to fulfil the purposes outlined in section 2. We will retain photographs and videos, and any accompanying image consent forms, for 5 years. After this period, your personal data will be securely destroyed.

7. Your rights

- You have the following rights under data protection law:
 - **Your right of access** - You have the right to ask us for copies of your personal information.
 - **Your right to rectification** - You have the right to ask us to rectify 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 information in certain circumstances.
 - **Your right to object to processing** - You have the right to object to the processing of your personal data in certain circumstances.
 - **Your right to data portability** - You have the right to ask that we transfer the information you gave us to another organisation, or to you, in certain circumstances.
- Many of the rights listed above are limited to certain defined circumstances and we may not be able to comply with your request. We will tell you if this is the case.
- If you choose to make a request to us, we will aim to respond to you within one month. We will not charge a fee for dealing with your request.
- If you are dissatisfied with how we are using your personal information or if you wish to complain about how we have handled a request, then please contact us and we will try to resolve any issues you may have.
- You also have the right to complain to the relevant data protection supervisory authority in your country. For Belgium, that is the Autorité de la protection des données - Gegevensbeschermingsautoriteit (APD-GBA) and for the Netherlands that is the Autoriteit Persoonsgegevens.
- Details of how to complain to these authorities can be found at www.autoriteprotectiondonnees.be for Belgium and www.autoriteitpersoonsgegevens.nl for the Netherlands.