

## 1 Who are we and what do we do?

We are the Plastic Soup Foundation (a foundation incorporated under Dutch law), (hereinafter, **PSF, us and our**). PSF is a 'single issue' environmental organization that is concerned with one thing: stopping plastic pollution at its source.

We will give the planet a big cleanup with organizing a **World Cleanup Day** in 2020 with more than 180 countries. The goal is to clean up litter on streets, squares, parks, parking areas, along the banks of rivers and in nature simultaneously in as many countries as possible around the world. People can organize and/or participate a clean-up operation by signing up for or starting cleaning actions (the **Cleaning Actions**). PSF organizes the World Cleanup Day in the Netherlands.

Our website [www.worldcleanupday.nl](http://www.worldcleanupday.nl) (the **Website**) offers more information about us and our services.

## 2 World Cleanup Day and your Personal Data

PSF cares about your privacy and protecting your **Personal Data**. We process Personal Data – i.e. all information by which a person can be directly or indirectly identified – in line with the General Data Protection Regulation (**GDPR**)<sup>1</sup> and other relevant legislation regarding the protection of Personal Data (collectively referred to as the **Relevant Legislation**).

This Privacy Policy explains what kind of Personal Data we process via our Website and services regarding World Cleanup Day. It also explains the purposes for which Personal Data is used, how it is protected and the duration of its storage.

## 3 Are you younger than sixteen years old?

You may only give your consent to receive newsletters and to share your Personal Data with Stichting Nederland Schoon (**NederlandSchoon**) if you are sixteen years or older.

## 4 Our role as Data Controller

We process Personal Data in the context of our Website and services. We determine the purposes and means of these processing activities. This means we act as **Data Controller** within the meaning of the Relevant Legislation.

## 5 What Personal Data do we process and for what purposes do we use them?

Depending on the relationship we have with a person, we process various Personal Data for different purposes. Below is a breakdown of what Personal Data we process when you use our Website (**Visitors**), create or sign up for a Cleaning Action, make a donation or use the **Litterati App**.

Personal Data we collect of **Website Visitors**:

<b>(Personal) Data:</b>	<b>Purpose(s):</b>	<b>Legal basis:</b>
<i>Contact form and email</i> First- and last name, organisation name (optional), e-mail address, and other (personal) data you share with us by sending us a message via the contact form or per e-mail, including any Personal Data within such message.	We use this data: <ul style="list-style-type: none"><li>• contact you based on your message;</li><li>• improve our services.</li></ul>	We may process these Personal Data, because we have a legitimate interest to process these data. We need these data to contact you regarding your message.

<sup>1</sup> <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32016R0679&from=en>

<p><i>Technical information</i></p> <p>Information on the device used to access our Website, IP-address and information on the used browser/device.</p>	<p>We use this data:</p> <ul style="list-style-type: none"> <li>• adapt our Website to the used device;</li> <li>• communicate in the language of the browser;</li> <li>• improve the support for the Website.</li> </ul>	<p>We use these Personal Data because we have a legitimate interest to process these data in order to provide a good functioning Website.</p>
<p><i>Social media</i></p> <p>Information you make public, when you leave a comment or otherwise post something on our social media channels.</p>	<p>We use this data:</p> <ul style="list-style-type: none"> <li>• contact you via our social media channels;</li> <li>• process your feedback left on our social media channels.</li> </ul>	<p>We may process these Personal Data, because we have a legitimate interest to process these data and because you voluntarily made such information public.</p> <p>Our social media channels are also controlled by the social medium itself. Please check their own privacy policies, to see how each social medium processes Personal Data:</p> <p>Instagram: <a href="#">Privacy Settings &amp; Information</a></p> <p>Facebook: <a href="#">Data Policy</a></p> <p>LinkedIn: <a href="#">Privacy Policy</a></p> <p>Twitter: <a href="#">Privacy Policy</a></p> <p>YouTube: <a href="#">Privacy Policy</a></p>
<p><i>Newsletters</i></p> <p>Email address</p>	<p>We use this data to send you newsletters per email, in order to keep you up-to-date on our activities, campaigns, and news.</p>	<p>We may only send newsletters, if you gave us permission to do so via an opt-in.</p> <p>It is always possible to revoke your permission by unsubscribing from our newsletter via the link at the bottom of each newsletter.</p>

Personal Data we collect of **Organizers** that create a Cleaning Action:

<b>(Personal) Data:</b>	<b>Purpose(s):</b>	<b>Legal basis:</b>
<p><i>Information on the Cleaning Action</i></p> <p>Name, description, location, time and timeframe of the Cleaning Action, maximum of Participants (optional) and whether or not the Cleaning Action is private.</p>	<p>We use this data to:</p> <ul style="list-style-type: none"> <li>• show the Cleaning Action on the map of both PSF and NederlandSchoon;</li> <li>• inform (possible) Participants about the Cleaning Action.</li> </ul>	<p>We may process these Data, because they in principle do not contain Personal Data.</p> <p>We strive not to show any Personal Data on the map.</p>
<p><i>Contact information</i></p>	<p>We use this data to:</p> <ul style="list-style-type: none"> <li>• create the Cleaning Action;</li> </ul>	<p>We may process these Personal Data, because this is necessary to perform our agreement with you (i.e.</p>

First- and last name and email address.	<ul style="list-style-type: none"> <li>• contact you regarding your Cleaning Action;</li> <li>• send you contact information of Participants of your Cleaning Action, so you can contact them regarding the practical coordination of the Cleaning Action if necessary;</li> <li>• share your contact information with Participants of your Cleaning Action, so they can contact you regarding the practical coordination of the Cleaning Action if necessary;</li> <li>• allow you to create an account on our Website, through which you can manage your Cleaning Action(s).</li> </ul>	<p>create the Cleaning Action at your request and create your account).</p> <p>We have a legitimate interest to contact you regarding your Cleaning Action, in order to inform you on practical matters. Furthermore, we have a legitimate interest to share your contact information with Participants, in order to enable Participants to contact you regarding the practical coordination of your Cleaning Action.</p>
<i>Newsletters</i> Email address	<p>We use this data to send you newsletters per email, in order to keep you up-to-date on our activities, campaigns, and news.</p>	<p>We may only send newsletters, if you gave us permission to do so via an opt-in.</p> <p>It is always possible to revoke your permission by unsubscribing from our newsletter via the link at the bottom of each newsletter.</p>

Personal Data we collect of **Participants** that sign up for a Cleaning Action:

<b>(Personal) Data:</b>	<b>Purpose(s):</b>	<b>Legal basis:</b>
<i>Contact information</i> First- and last name and email address.	<p>We use this data to:</p> <ul style="list-style-type: none"> <li>• sign you up for the Cleaning Action;</li> <li>• share with the Organizer in order for the Organizer to contact you regarding the practical coordination of the Cleaning Action;</li> <li>• send you contact information of the Organizer of the Cleaning Action, so you can contact the Organizer regarding the practical coordination of the Cleaning Action if necessary.</li> </ul>	<p>We may process these Personal Data, because this is necessary to perform our agreement with you (i.e. to sign you up for the Cleaning Action).</p> <p>We have a legitimate interest to contact you regarding the Cleaning Action, in order to inform you on practical matters. Furthermore, we have a legitimate interest to share your contact information with the Organizer, in order to enable the Organizer to contact you regarding the practical coordination of the Cleaning Action.</p>
<i>Newsletters</i> Email address	<p>We use this data to send you newsletters per email, in order to keep you up-to-date on our activities, campaigns and news.</p>	<p>We may only send newsletters, if you gave us permission to do so via an opt-in.</p>

		It is always possible to revoke your permission by unsubscribing from our newsletter via the link at the bottom of each newsletter.
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Donations:

<b>(Personal) Data:</b>	<b>Purpose(s):</b>	<b>Legal basis:</b>
<p><i>Contact and payment information</i></p> <p>First- middle and last name and e-mail address.</p> <p>Optional: Address and phone number.</p> <p>Donation amount, payment method and bank information (IBAN).</p>	<p>We use this data to:</p> <ul style="list-style-type: none"> <li>• contact you regarding your donation;</li> <li>• register you as a PSF donor;</li> <li>• process your donation;</li> <li>• include in our financial administration;</li> <li>• share with the national tax authorities (as far as necessary).</li> </ul>	<p>We may process this is necessary to perform our contract with you, i.e. to process your donation.</p> <p>We are also legally obligated to process (some of) these data on behalf of the national tax authorities.</p>
<p><i>Newsletters</i></p> <p>Email address</p>	<p>We use this data to send you newsletters per email, in order to keep you up-to-date on our activities, campaigns, and news.</p>	<p>We may only send newsletters, if you gave us permission to do so via an opt-in.</p> <p>It is always possible to revoke your permission by unsubscribing from our newsletter via the link at the bottom of each newsletter.</p>

Personal Data we collect via the **Litterati App**:

<b>(Personal) Data:</b>	<b>Purpose(s):</b>	<b>Legal basis:</b>
<p><i>Photos and descriptions</i></p> <p>Pictures you take of collected litter, tags and/or descriptions of litter that is found during the Cleaning Actions.</p>	<p>We use this data to:</p> <ul style="list-style-type: none"> <li>• gain insight on the nature and amount of litter collected during the Cleaning Actions;</li> <li>• share these insights with people and/or organisations interested in this information.</li> </ul>	<p>We may process these Data, because they in principle do not contain Personal Data.</p> <p>If the photos however do contain Personal Data, we may process these Personal Data because we have a legitimate interest.</p> <p>We strive to not share any photos that contain Personal Data with other parties.</p>
<p><i>Location</i></p> <p>The location of the litter that is found during the Cleaning Actions.</p>	<p>We use this data to:</p> <ul style="list-style-type: none"> <li>• gain insight in the location of various types of litter found during the Cleaning Actions and use this insight for new campaigns and actions;</li> <li>• share these insights with people and/or organisations interested in this information.</li> </ul>	<p>We may process these Data, because they in principle do not contain Personal Data.</p> <p>If from the location however Personal Data can be derived, we may process these Personal Data because we have a legitimate interest.</p>

<p><i>Results</i></p> <p>The results of challenges within the Litterati App</p>	<p>We use this data to gain insight on the nature and amount of litter collected during the Cleaning Actions and the success of the Cleaning Actions.</p>	<p>We may process these data, because they in principle do not contain Personal Data.</p> <p>If the results however do contain Personal Data, we may process these Personal Data because we have a legitimate interest.</p>
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**6 How long do we store the Personal Data?**

It is our policy to store and process only those Personal Data that are essential to provide you with the best possible service. We will not process or store any Personal Data that we do not need. We store Personal Data for as long as we need it for the above purposes, unless we are legally obliged to retain the Personal Data for a longer period. In this respect, we apply the following retention periods:

- **Personal Data of Website Visitors** | This data is stored until you unsubscribe from our newsletter via the link at the bottom of each newsletter.
- **Personal data in our records for the tax authorities** | This data is stored for seven (7) years, unless we are legally obliged to retain the data for a longer period.
- **Other information** | We store other Personal Data only for as long as it is necessary for the purposes. This is deleted as soon as it is no longer necessary for the purposes for which we processed it.

We may also process all aforementioned Personal Data when we have a good faith belief it is necessary to detect, prevent and address fraud and other illegal activity. Personal Data that we process to prevent fraud (or users who have committed fraud), we store for a maximum of five (5) years.

Personal Data we process may be accessed, processed and retained for an extended period of time when it is the subject of a legal request or obligation, governmental investigation, or investigations concerning possible violations of our terms or policies, or otherwise to prevent harm.

**7 Do we share your Personal Data with others?**

We use third parties (**Data Processors**) for e.g. e-mail management, data storage, app development, content management systems (CMS) and communications.

We only provide such Personal Data to third party service providers which is necessary for them to execute the services they provide to us. Our use of Processors is always in accordance with the Relevant Legislation. We have established contractual agreements with all our Data Processors in Data Processor Agreements in which - in line with this Privacy Policy - is defined what these parties may do with your Personal Data, how they must secure it and when it must be deleted.

*External Data Controllers*

Payments (such as donations via our Website and purchases via the PSF Webshop) can be processed via our third party payment processor: Buckaroo B.V.. These payment processing services are provided by Buckaroo B.V. and respectively the terms and conditions of those services will apply to the payments you make using them. Any Personal Data you provide to this payment provider will be processed by Buckaroo B.V. (as Data Controller) in accordance with their own privacy policy.

We are legally obliged to include (some of) the Personal Data in our financial administration, which has to be shared with the national tax authority. The tax authority will process these Personal Data as Data Controller in accordance with its own privacy policies.

Apart from the above, we will not share your Personal Data with third parties, unless we are legally obliged to do so.

*Litterati*

We also use the Litterati App, through which Participants/Organizers can take a photo and describe and/or tag the types of litter they have found during their Cleaning Action(s). This is an external application, not owned by us but by [Litterati LLC](#). Litterati LLC determines the purposes and means of the processing activities via Litterati. Therefore, Litterati LLC acts as Data Controller within the meaning of the Relevant Legislation. Litterati LLC shares 'litter data' uploaded by its users to Plastic Soup Foundation. In principle,

this litter data does not include Personal Data (but if the litter data does contain Personal Data, Plastic Soup Foundation acts as Data Controller regarding these Personal Data). For transparency reasons we have therefore included the data (and possible Personal Data) processed via Litterati in this privacy policy under section 5.

For more information, please see: <https://www.plasticsoupfoundation.org/wat-wij-doen/zwerfafval/opruimen/#instructies> and <https://www.litterati.org/>.

## **8 Cooperation with NederlandSchoon**

PSF cooperates with NederlandSchoon regarding organizing the World Cleanup Day.

If you create a Cleaning Action or if you subscribe to a Cleaning Action on the map provided on the website of PSF or NederlandSchoon, and if you give your permission to do so, your Personal Data will be shared with NederlandSchoon, to enable NederlandSchoon to send you information about its initiatives that are similar to World Cleanup Day. In that event NederlandSchoon will receive:

- Your name;
- Your email address.

If you do not give your consent, we will not share your Personal Data.

The Personal Data will only be processed by NederlandSchoon in order to provide you information about their initiatives similar to World Cleanup Day and not for other purposes.

In any event your data (in principle no Personal Data) regarding the Cleaning Action will be visible on the map on the website of both PSF and NederlandSchoon. The information visible includes: the name, the location, the time and, if the action is organized by a school or company, the name of such school or company. The maps on both websites are connected.

We process these Personal Data only to inform (possible) Participants about the Cleaning Actions available.

PSF and NederlandSchoon jointly determine the purpose and means of this processing and qualify as Joint Controllers regarding this processing in accordance with article 26 of the GDPR. PSF concluded the respective responsibilities, roles and relationships with NederlandSchoon in a mutual arrangement within the meaning of article 26 of the GDPR. In this arrangement PSF and NederlandSchoon have agreed, including but not limited to, that they are each responsible for fulfilling the obligations ensuing under the GDPR. You can exercise your rights (as described in this privacy policy) with both PSF and NederlandSchoon. Where necessary, PSF or NederlandSchoon may refer you, if you can exercise your rights more quickly or effectively with the other party.

### **Contact details of NederlandSchoon**

Benoordenhoutseweg 46

2596 BC DEN HAAG

(+31)70 304 2080

E-mail address: [info@nederlandschoon.nl](mailto:info@nederlandschoon.nl)

Ch. Of Comm: 41210420

## **9 Export of data outside the European Union (EU)**

We process the Personal Data in principle in the Netherlands. We may transfer Personal Data to parties outside the EU, if one of our Data Processors is established outside the EU. The Personal Data will only be transferred to countries and/or parties that provide an adequate level of protection in accordance with the European standards. The transfer of data outside the EU will always take place in accordance with the Relevant Legislation (Chapter 5 of the GDPR).

## **10 How do we protect the Personal Data?**

We make every effort to protect the Personal Data we process from unauthorized and unlawful access, change, disclosure, use or destruction. We take, among other things, the following technical and organizational measures to protect the Personal Data:

- applying encrypted transmission to limit access to the systems on which the Personal Data are stored;

- limited access to the (Personal) Data for authorized employees on a need-to-know basis;
- encryption through passwords;
- network connection with Secure Socket Layer (SSL) technology;
- applying two-factor authentication internally for accessing the (Personal) Data;
- split of application and database servers.

## 11 Third-party websites

Our Website contains (hyper)links to websites of partners, suppliers, advertisers, sponsors, licensors or other third parties. We have no control over the contents or links that appear on these websites and we are not responsible for the practices of websites linked to or from our Website. In addition, these websites and their contents and links can change constantly. These websites may have their own privacy policies, user terms and client policy. Browsing and interaction on any other website, including websites linked to or from our Website, are subject to the terms and policy of that website.

## 12 Amendments to this Privacy Policy

We aim to constantly improve our Website and Services. This means our Privacy Policy could be amended from time to time. If this Privacy Policy is amended significantly, then a notification is placed on our Website along with the updated Privacy Policy.

## 13 Your rights and our contact details

As laid down in the Relevant Legislation, you have the right to:

- request us to correct or update Personal Data;
- request Personal Data to be deleted from our database;
- request a copy of the Personal Data that we have processed. A copy of this may also be submitted to another data controller at your request;
- withdraw consent for the processing of Personal Data. This does not affect the validity of processing executed before the time that consent was withdrawn;
- lodge an objection to us processing Personal Data;
- submit a complaint to the Dutch Data Protection Authority (*Autoriteit Persoonsgegevens*), if the data subject thinks we process data unlawfully.

We are committed to respond to such requests within five (5) working days after receipt. To exercise the rights mentioned above, but also in the event of enquiries, comments, or concerns about the manner in which we deal with Personal Data, please contact us through the contact data below.

## 14 Contact Data

Stichting Plastic Soup Foundation

Sumatrakade 1537

1019 RS Amsterdam

The Netherlands

E-mail address: [gdpr@plasticsoupfoundation.org](mailto:gdpr@plasticsoupfoundation.org)

Ch. Of Comm: 52072894

VAT: NL 8502 888 85 B01