

This website is operated by **MUNiverse Ltd** (“We”, “Us”, “Our”, “MUNiverse”) and we are a data controller for the purposes of the 2016 General Data Protection Regulation, the 2018 Data Protection Act (DPA) and the Data Protection Act 1998.

MUNiverse aims to provide its services while minimising data gathered and retained on individuals. This policy sets out why each form of gathered data is required, as well as its usage and how long we will use it for.

To avoid an endless range of different privacy policies, this policy aims to set out a complete overview. The only exception is that of in-person conference attendance by MUNiverse personnel, where the policy will be extended to cover other areas, such as photos.

Some very brief definitions:

- a) **Connect** – MUNiverse’s conference administration software, handling registration and approvals;
- b) **Learn** – database of training resources for delegates, chairs and advisors, as well as a resolution database and training timelines. Custom training packages are also stored here;
- c) **Rapporteurs** – MUNiverse staff;
- d) **Model United Nations (“MUN”)** – the role-playing simulation that is provided and aided by MUNiverse as our core purpose;

Personal Information Collected for Which Uses

Basic personal information – names, email addresses, schools, country, MUNiverse-service passwords

- a) **Learn** account registration, to provide access;
- b) **Connect**, to enable administration (badge creation etc), payment tracking and resolution submission. Account registration. Details will be required for every attending person (teacher or pupil);
- c) Booking/purchase of any MUNiverse product;
- d) Participating in any MUNiverse competition;
- e) Some schools provide this information for any **training sessions** held by MUNiverse rapporteurs;
- f) **Conference assistance**, in the event that participants are not using Connect;
- g) Country details may be set to allow adjustment for financial purposes as well as potential data handling necessities outside of the EEA;
- h) Analysis of likely attendance by individuals schools;
- i) Provision of rare updates to MUNiverse services to the “contact point” teacher of each licensee;
- j) Issue assistance as necessary;

Dietary requirements, payment status, school addresses, hotel stay-locations

- a) **Connect**, to ensure suitable coverage of dietary requirements at conferences;

- b) **Connect**, to determine payment of delegations attending conferences;
- c) Internal payment tracking of personal purchases made from MUNiverse, so as to grant services appropriately;
- d) Address details used to enable logistical planning and timings regarding attending schools, as well as clarification of identical school names;
- e) Host locations needed to enable transport planning/booking as well as movement co-ordination during conferences by schools;

Phone numbers, (MUN) experience level, job roles

- a) Phone numbers and (non-MUN) job roles may be provided by teachers to enable co-ordination with rapporteurs;
- b) Experience levels provided to aid the targeting of training packages and sessions to be most beneficial for participants;

Host Conference Bank Details

- a) Details given on **Connect** to enable payment of conference fees;

There is also analysis of aggregated, anonymised, data (total attendance, data traffic etc) of activities to enable targeting of products and effort by MUNiverse.

Retention periods

Unlike most companies which retain all data for years at a minimum, MUNiverse commits to short data retention periods, with data deleted securely afterwards. This table includes the various top-level usages of personal data and how long the data will be kept for, it doesn't include the previously mentioned anonymised data.

| Data Usage | Retention Period |
|--|--|
| Connect: conferences & delegate accounts | 2 months post conference |
| Connect: non-delegate accounts | Shorter of 2 months post conference or 12 months of non-activity |
| Learn user details | 6 months post-license |
| Payment details, invoices, legal documentation | 7 years |
| Non-Connect conference administration details | 2 months post conference |

3rd Party Usage

Data entrusted to MUNiverse is usually only used by rapporteurs, but there are several 3rd parties that data may be shared with. These are usually to provide either background services or clients.

- a) **Google** – Gmail, Google Drives, Google Analytics;
- b) **Apple** – Use of a MUNiverse app may involve sharing data with Apple, the data will not specifically be shared by MUNiverse;

- c) **Schools** – The host school of any conference using Connect or MUNiverse rapporteurs will have access to all administrative data provided by attending individuals;
- d) **Insurance** – In the case of an incident, the current insurers of MUNiverse may receive access of relevant personal information;
- e) **Accountants** – MUNiverse accountants will receive access to financial information. This may include a list of schools but should not include any individual details;
- f) **Additional experts** – other experts may be used on an as-needed basis to cover necessary aspects of MUNiverse’s functioning. This may include cyber-security, marketing, travel and other aspects of providing agreed services;

Legal Basis – the tedious bit

One of the more complicated aspects of GDPR is the necessity to provide a lawful basis justifying our use of every single form of personal data. Only four types of basis are relevant to MUNiverse and its clients – below is a minimised form for clarity. Please contact MUNiverse if additional detail is desired.

Contract

- a) Details involved in creating any account with MUNiverse;
- b) School and financial data of those attending a conference via Connect;
- c) Details provided to rapporteurs for training sessions and Learn;
- d) Payment details for services provided by MUNiverse;
- e) Post-Conference Analysis;

In our Legitimate Interests to provide a better service

- a) Delegate information provided to be able to attend a conference/training that is not covered under Contract justification;
- b) Provision of minimal details to 3rd party contractors to provide a better service;
- c) Provision of details to MUNiverse accountants/insurers to enable functioning of the company;
- d) Session ID to enable smoother usage of MUNiverse website and systems for users;
- e) Market research – detail provided on conferences and MUNiverse services to provide a better future service. May be provided non-anonymously if desired by participant;
- f) Service analysis, fraud prevention and system security – providing a secure, safe, system and software;

With Consent of individuals

- a) With Consent, teachers who demonstrate an interest in MUNiverse may receive an extremely rare marketing update, usually providing detail on specific services that interest was indicated in;
- b) Pictures and reviews of MUNiverse services may be displayed on our website;

Legal Obligations

- a) Taxation – to ensure we meet tax/regulatory requirements;

Under-18s

MUNiverse's very purpose is to introduce MUN to school pupils. This obviously necessitates large numbers of under-18 individuals, as well as significant numbers of under-16 individuals, sharing some data.

MUNiverse uses extremely minimal personal data from pupils: names, schools, dietary requirements. In a few over-16 cases, email addresses for usernames may be known. Consent is not used as a legal basis for any non-anonymised data usage of pupils.

Cookies – Data and Usage

MUNiverse uses an extremely minimal set of cookies (or de-facto cookies) on our systems. However use of these cookies is inherently built into our systems and thus can only be avoided by ceasing to use MUNiverse software. Therefore, by continuing to use the site after being informed you will be deemed to have agreed to their usage.

- a) Google analytical cookies (aggregated) – all data is anonymised and aggregated, with no personally identifying information remaining. This is used to demonstrate general activity on MUNiverse sites;
- b) Session ID – this generates a session ID for any visitor to either a MUNiverse site or Connect. It enables smoother flowing between different pages within the domains and relevant retention of in-progress data. This is associated only with the ID and no data is additionally retained by the cookie. When the user terminates the session no data is retained;

Transfer of Information outside of the EEA

Simply enough – if you aren't outside of the EEA yourself (or attending a conference that is), then we don't share. For those that are, obviously we have to pass data to operate to those 3rd parties, but our own servers remain within the EEA.

Your Rights – and How to Use Them

GDPR gives a significantly increased range of rights to individuals over their data. To exercise some of your requests below, we may have to verify your identity to be able to follow them.

The right to access information we hold about you

You may always contact us about the data we hold on you. This includes why we have it, who has access to it (in and out of MUNiverse) and where we got it. Usually we will provide copies of this information. Once received we will provide a response within **no more than 30 days**.

The right to correct and update the information we hold about you

Obviously both parties want information that is held to be correct. If our data on you is incorrect, let us know and we will correct it.

The right to have your information erased

If you don't think we should be using your data you can tell us to erase it. When we receive it we will either delete it or let you know why we cannot. If we are using your data on the basis of your consent we **must** delete it upon request.

In some cases you may have the right to have us delete the data but that would cause us to be unable to provide you services – we will provide you with the choice if so.

The right to object to processing of the data

The right to have us stop processing (i.e. using) your data. Upon request we will either confirm our ceasing or explain why we have grounds to continue. In a few cases we may cease processing but continue to hold the data (usually on legal grounds).

The right to ask us to stop contacting you with direct marketing

You have an absolute right to stop us contacting you with any direct marketing – just let us know and we will stop immediately.

You may also contact us to stop emailing you with all but the most critical of emails.

The right to data portability

The right to have us transfer your data to another controller (as well as yourself) in a machine-readable format, if it is feasible.

The right to complain

You may complain to us by contacting info@muniverse.co.uk or to the data protection supervisory authority. In the UK, this is the Information Commissioner's Office, at <https://ico.org.uk/>

Contact Details and Privacy Policy Changes

info@muniverse.co.uk

We may alter the Privacy Policy occasionally. These changes will generally be small with minimal content alterations. Major changes will be emailed to those whose data MUNiverse possesses.