

PRIVACY POLICY

WorldSkills International

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1 INTRODUCTION

This Privacy Policy sets out the personal data WorldSkills International collects, and the information related to an individual's use of the services offered on the WorldSkills International website and on the other digital properties managed by WorldSkills International and the WorldSkills Foundation.

Data is collected, controlled, and processed by WorldSkills International, an association registered in Amsterdam and governed by the laws of the Netherlands.

Registered office:

WorldSkills International
Keizersgracht 241
1016 EA Amsterdam
The Netherlands

WorldSkills International is subject to the European Union General Data Protection Regulation (2016) for the protection of natural persons with regard to the processing of personal data and on the free movement of such data for all citizens of the European Union. WorldSkills International will apply the principles of this regulation (subject to other jurisdiction's data sovereignty laws) to its treatment of personal data belonging to individuals regardless of their citizenship.

Please email all enquiries relating to the collection, control, or processing of personal data, or to exercise data subject rights to privacy@worldskills.org.

1.1 DEFINITIONS

These definitions are taken from the European Union General Data Protection Regulation (2016).

1.1.1 PERSONAL DATA

Personal data means any information relating to an identified or identifiable natural person; an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural, or social identity of that natural person.

1.1.2 PROCESSING

Processing means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure, or destruction.

2 ORGANIZATIONS AND WEBSITES WITHIN SCOPE

The following organizations and websites fall within the scope of this Privacy Policy.

ORGANIZATION	WEBSITES AND APPLICATIONS
WorldSkills International	<p>Website: www.worldskills.org</p> <p>Applications: auth.worldskills.org connect.worldskills.org events.worldskills.org forums.worldskills.org glossary.worldskills.org il.worldskills.org people.worldskills.org registration.worldskills.org restaurant-service.worldskills.org resources.worldskills.org skill-management.worldskills.org org.worldskills.org</p> <p>Inclusive of any other applications developed for use by WorldSkills International.</p>
WorldSkills Foundation	<p>Website: www.worldskillsfoundation.org</p>
Previous WorldSkills events	<p>Websites: www.worldskills2001.com up to www.worldskills2017.com</p> <p>Inclusive of any city named domains for previous events.</p>

This policy applies to future event websites hosted and managed by WorldSkills International in regard to usage data collection. Any registration or data collection systems managed by the host of any future WorldSkills event is outside the scope of this policy, except where it applies under section 7.

3 COLLECTING PERSONAL INFORMATION

The collection of an individual's personal data shall be adequate, relevant, and limited to what is deemed necessary for processing purposes. This is the principle of data minimization.

Personal data is collected for one or more of the following purposes:

1. To record the details of officers, membership, delegates, or competition personnel as specified in the official documents of WorldSkills International: Constitution, Standing Orders, Code of Ethics and Conduct, and Competition Rules, or any other committee, working group, or body within the organization.
2. To register and determine validity to participate at a WorldSkills event.
3. To fulfil a contract that WorldSkills International has entered into with an individual or with an entity that the individual represents.
4. To initiate and complete commercial transactions with an individual, or the entity that the individual represents, for the purchase of products and/or services.
5. To manage any communication between an individual and WorldSkills International.

3.1 USE OF WEBSITES

In order to ensure that each visitor to any WorldSkills International website can use and navigate the site effectively, the following is collected:

- information about a visitor's computer including IP address, geographical location, browser type and version, and operating system; and
- information about visits to and use of the website including the referral source, length of visit, page views, and website navigation paths.

3.1.1 COOKIES

WorldSkills International handles the personal data it receives through the website with care. When an individual visits the website for the first time, the web server sends a cookie to the individual's device on behalf of WorldSkills International for statistical purposes. A cookie is also used to maintain a logged in session as an individual uses WorldSkills International websites. If an individual chooses to not make use of these features, they can set their Internet browser to block cookies. If they accept cookies, they will remain on the individual's device for up to five years unless deleted.

4 **LAWFULNESS OF PROCESSING**

WorldSkills International has reviewed the purposes of processing activities and selected the most appropriate lawful basis for each activity.

4.1 **LAWFUL BASES**

Collection and processing of an individual's personal data is lawful only if and to the extent that at least one of the following legal bases applies.

4.1.1 **LEGITIMATE INTEREST**

As a membership organization WorldSkills International has the legal basis to collect and use the minimum required data of an individual associated with WorldSkills International for the purposes of managing office holders, membership, delegates, or competition or event personnel.

4.1.2 **CONTRACTUAL PERFORMANCE**

Where processing is necessary for the performance of a contract to which an individual is party.

4.1.3 **CONSENT**

An individual has given consent to the collection and use of personal information. Such consent is optional and can be the withdrawn at any time.

4.1.4 **LEGAL OBLIGATION**

Processing of personal data that is necessary for compliance with a legal obligation to which WorldSkills International is subject.

4.1.5 **VITAL INTEREST**

Processing of personal data that is necessary to protect the vital interests of an individual.

5 PERSONAL DATA DETAIL

PURPOSE OF COLLECTION	DATA COLLECTED	PURPOSE FOR COLLECTION	LAWFUL BASIS FOR PROCESSING	DATA SHARED WITH	RETENTION PERIOD
Record details of individuals associated with WorldSkills International	Title, name, Member country/region, email, position, photo	To store details of individuals associated with WorldSkills International	Legitimate interest	<ul style="list-style-type: none"> Internally “Who-is-Who” accessible by Members 	Retained indefinitely for historical purposes.
	Gender, phone numbers, addresses, other demographic data as requested	To provide additional contact and demographic data for individuals associated with WorldSkills International	Consent	<ul style="list-style-type: none"> Internally “Who-is-Who” Address is accessible by Members 	Retained for as long as consent is given. Data removed if no longer current.
	Name, email	To provide members of the public with Member contact details	Consent	<ul style="list-style-type: none"> Publicly available 	As long as the individual is a contact for the Member Organization.
	Emergency contact details and other health and insurance related information	To use in emergency situations	Vital interest	<ul style="list-style-type: none"> Internally Medical authorities Professional advisors 	Retained for the duration of association

PURPOSE OF COLLECTION	DATA COLLECTED	PURPOSE FOR COLLECTION	LAWFUL BASIS FOR PROCESSING	DATA SHARED WITH	RETENTION PERIOD
Record details of individuals who may be potentially associated with WorldSkills International	Name, email, position, organization, plus other data to identify and manage communication within a CRM system	To store details of individuals potentially associated with WorldSkills International	Consent	<ul style="list-style-type: none"> Internally 	Retained for as long as consent is given. Data removed if no longer current.
Record details of individuals who are employed or contracted to work with WorldSkills International	Name, email, position, phone numbers, addresses, bank account details, and other identification informant as required	To store details of individuals who are employed or contracted to work with WorldSkills International	Contractual performance	<ul style="list-style-type: none"> Internally 	Employee records retained for seven years from the date of the conclusion of the contract.
	Emergency contact details and other health and insurance related information	To use in emergency situations	Vital interest	<ul style="list-style-type: none"> Internally Medical authorities Professional advisors 	Retained for the duration of employment or contract
Register and determine validity to participate at a WorldSkills event	Name, Member country/region, email, position, photo, date of birth, passport number	To collect information of the participants at a WorldSkills event.	Legitimate interest	<ul style="list-style-type: none"> Internally Competition Organizers 	Retained indefinitely for historical purposes.

PURPOSE OF COLLECTION	DATA COLLECTED	PURPOSE FOR COLLECTION	LAWFUL BASIS FOR PROCESSING	DATA SHARED WITH	RETENTION PERIOD
	Competitor name, Member country/region, and photo	Used to show competitor lists on event websites and applications	Legitimate interest	<ul style="list-style-type: none"> Publicly available on event website and related applications Medallists and awardees available for historical purposes on WorldSkills website 	Retained indefinitely for historical purposes.
	Title, gender, phone numbers, addresses, profile, social networks, other demographic data as requested for an event	To provide additional contact and demographic data for individuals associated with a WorldSkills event	Consent	<ul style="list-style-type: none"> Internally Anonymized data may be shared with Competition/event Organizers 	Retained for as long as consent is given. Demographic data anonymized after an event.
	Emergency contact details and other health and insurance related information	To use in emergency situations	Vital interest	<ul style="list-style-type: none"> Internally Medical authorities Professional advisors 	Retained for the duration of the event.
Transactional information	Name, physical address, email address, telephone number, and bank account details.	To process purchase or reimbursement transactions	Contractual performance	<ul style="list-style-type: none"> Internally 	Seven years from the date of the conclusion of the contract.
		For accounting and taxation purposes	Legal obligation	<ul style="list-style-type: none"> Internally Professional advisors 	Seven years for financial and taxation records.

PURPOSE OF COLLECTION	DATA COLLECTED	PURPOSE FOR COLLECTION	LAWFUL BASIS FOR PROCESSING	DATA SHARED WITH	RETENTION PERIOD
	Cardholder name, credit card number, expiration date	To fulfil purchase requests using credit cards	Contractual performance	<ul style="list-style-type: none"> • Card payment company 	Only retained whilst authorization is pending.
Package selection information	Name, position, Member country/region, gender, hotel selection, dietary requirements, special requirements	Provision of package, accommodation, and meal requirements	Contractual performance	<ul style="list-style-type: none"> • Internally • Competition Organizers • Third party service providers 	Retained for the duration of the event. Anonymized for historical purposes.
Discussion facilitation	Name, position, email, Member country/region, plus any information volunteered by an individual in the content of or attachments to a post	Discussion posts to the WorldSkills Forums	Consent	<ul style="list-style-type: none"> • Accessible to members of the forums (Members and other authorized third parties) 	Retained for historical purposes for as long as consent is given.
General Communication	Name, email, Member country/region, position	Official emails and internal communication	Legitimate interest	<ul style="list-style-type: none"> • Internally • Mail hosting provider 	Retained indefinitely for historical purposes. Data removed if no longer current.

PURPOSE OF COLLECTION	DATA COLLECTED	PURPOSE FOR COLLECTION	LAWFUL BASIS FOR PROCESSING	DATA SHARED WITH	RETENTION PERIOD
	Name, email	Newsletter distribution	Consent	<ul style="list-style-type: none"> Internally Newsletter mailing service provider 	Retained for as long as consent is given. One year if newsletter email remains unopened.
	Name, email, organization	Press release distribution	Consent	<ul style="list-style-type: none"> Internally Newsletter mailing service provider 	Retained for as long as consent is given. One year if communication email remains unopened.
	Name, email, plus any other information volunteered by an individual in the content of or attachments to an email	Emails sent to an @worldskills.org address	Legitimate interest	<ul style="list-style-type: none"> Internally As needs basis with Competition Organizers or third parties 	All outbound email communication is retained. Select inbound email communication is retained for as long as the data is required, subject to the rights of an individual – see section 10.

PURPOSE OF COLLECTION	DATA COLLECTED	PURPOSE FOR COLLECTION	LAWFUL BASIS FOR PROCESSING	DATA SHARED WITH	RETENTION PERIOD
Collect survey data	Minimal data as required by the intended results of the survey	Generate data analysis via survey	Consent	<ul style="list-style-type: none"> • Internally • Anonymized data may be shared with Competition Organizers and other third parties 	Personal identifiable data retained for the collection period of the survey. Anonymized for historical purposes.

6 USING PERSONAL INFORMATION

An individual's personal data will only ever be used for the purposes for which it is collected. Should the purposes change, WorldSkills International will contact the individual and inform them based in the lawfulness of processing determined for the new process.

An individual's personal data will not be transferred to any third party for their or any other third party's direct marketing.

An individual's personal data must be accurate and, where necessary, kept up to date; every reasonable step will be taken to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed according to this policy, are erased or rectified without delay.

7 DISCLOSING PERSONAL INFORMATION

WorldSkills International may disclose an individual's personal information to any of its office holders, members, delegates, competition or event personnel, Competition Organizers, employees, contractors, advisers, vendors, agents, service providers, suppliers, or subcontractors as reasonably necessary for the purposes set out in this policy.

WorldSkills International may disclose an individual's personal information:

1. to the extent that WorldSkills International is required to do so by law;
2. in connection with any ongoing or prospective legal proceedings;
3. in order to establish, exercise, or defend WorldSkills International's legal rights; and
4. to any person who WorldSkills International reasonably believes may apply to a court or other competent authority for disclosure of that personal information where, in WorldSkills International's reasonable opinion, such court or authority would be reasonably likely to order disclosure of that personal information.

Except as provided in this policy, WorldSkills International will not provide an individual's personal information to third parties.

7.1 OUR VENDORS AND SERVICE PROVIDERS

WorldSkills International relies on a network of professional vendors and service providers who are working on WorldSkills International's behalf and help operate, develop, secure, promote, and measure WorldSkills International's services.

Services provided by these partners include:

1. infrastructure and general IT services;
2. platform development services;
3. hosting services;
4. customer relationship management and other communication services;
5. analytics and measurement services;
6. email communications; and
7. third party web and social media services.

WorldSkills International may share information provided by an individual through services with these companies where necessary for them to provide to WorldSkills International their services and for the purposes and legal basis for processing highlighted in this Privacy Policy. These service providers are bound to strict confidentiality obligations, ensuring the respect of this Privacy Policy.

7.2 EVENTS RELATED SERVICES

If an individual uses WorldSkills International systems to request certain services, for instance registration or accreditation to attend the WorldSkills Competition or other events organized by WorldSkills International, or for booking accommodation in relation to these events, the provision of the services requested by an individual may require WorldSkills International to share personal information with third parties (e.g. travel or accommodation providers, Competition Organizers, or governmental agencies). WorldSkills International will specify in the relevant Terms of Service the categories of third parties with whom an individual's personal information may have to be shared and other conditions applicable to such sharing of information in relation to the services requested.

8 INTERNATIONAL DATA TRANSFERS

Information that WorldSkills International collects may be stored, processed in, and transferred between any of the countries and regions in which WorldSkills International operates in order to enable WorldSkills International to use the information in accordance with this policy.

An individual's personal data that is made available publicly on WorldSkills International's website in accordance with this Privacy Policy is available via the Internet, around the world. WorldSkills International cannot prevent the use or misuse of such information by others.

Information collected in order to participate at a WorldSkills event will be transferred to the country or region where the event is taking place for the purposes of managing an individual's participation at that event.

Individuals are reminded that data collected in different jurisdictions is subject to data sovereignty legislation within that jurisdiction. There may be instances where legislation in one jurisdiction is in conflict with the legislation of another. WorldSkills International will determine the best course of action that supports the individual's rights. In some cases that may mean that an individual may have to submit data already collected and processed in a system under one jurisdiction into another system that is subject to the legislation of another jurisdiction.

9 RETAINING PERSONAL INFORMATION

An individual's personal information that WorldSkills International processes for any purpose shall not be kept for longer than is necessary for that purpose (see table in section 4.2).

WorldSkills International will retain documents (including electronic documents) containing personal data:

1. to the extent that WorldSkills International is required to do so by law;
2. if WorldSkills International believes that the documents may be relevant to any ongoing or prospective legal proceedings; and
3. in order to establish, exercise, or defend WorldSkills International's legal rights.

10 SECURITY OF PERSONAL INFORMATION

WorldSkills International will take all reasonable technical and organizational precautions to prevent the loss, misuse, or alteration of an individual's personal information.

All electronic financial transactions entered into through WorldSkills International's website will be protected by encryption technology.

An individual is responsible for keeping the login details including password used for accessing WorldSkills International's website and applications confidential; WorldSkills International will not ask an individual for their password (except when logging in to the website or other WorldSkills applications).

WorldSkills International does not have any control over what happens between an individual's device and the boundary of WorldSkills International's information infrastructure. Transmission of information over the Internet is inherently insecure, and WorldSkills International cannot guarantee the security of data sent over the Internet. An individual should be aware of the many information security risks that exist and take appropriate steps to safeguard their own information. WorldSkills International accepts no liability in respect of breaches that occur beyond its sphere of control.

11 RIGHTS

As a data subject whose personal information WorldSkills International holds, an individual has certain rights. If an individual wish to exercise any of these rights, they may email privacy@worldskills.org.

An individual's rights are as follows:

11.1 THE RIGHT TO BE INFORMED

As a data controller, WorldSkills International is obliged to provide clear and transparent information about its data processing activities. This is provided by this privacy policy and any related communications sent by WorldSkills International.

11.2 THE RIGHT OF ACCESS

An individual may request a copy of the personal data held about them free of charge. Once WorldSkills International has verified an individual's identity and, if relevant, the authority of any third-party requestor, WorldSkills International will provide access to the personal data held about the individual as well as the following information:

1. the purposes of the processing;
2. the categories of personal data concerned;
3. the recipients to whom the personal data has been disclosed;
4. the retention period or envisioned retention period for that personal data; and
5. when personal data has been collected from a third party, the source of the personal data.

If there are exceptional circumstances that mean WorldSkills International can refuse to provide the information, WorldSkills International will explain them. If requests are frivolous or vexatious, WorldSkills International reserves the right to refuse them. If answering requests is likely to require additional time or unreasonable expense (which an individual may have to meet), WorldSkills International will inform the individual.

11.3 THE RIGHT TO RECTIFICATION

When an individual believes WorldSkills International holds inaccurate or incomplete personal information, the individual may exercise their right to correct or complete this data. This may be used with the right to restrict processing to make sure that incorrect/incomplete information is not processed until it is corrected.

11.4 THE RIGHT TO ERASURE (THE “RIGHT TO BE FORGOTTEN”)

Where no overriding legal basis or legitimate reason continues to exist for processing personal data, an individual may request that WorldSkills International deletes the personal data. This includes personal data that may have been unlawfully processed. WorldSkills International will take all reasonable steps to ensure erasure.

Legitimate reasons for retaining data include participation at a WorldSkills Competition, where name, country, skill, position, and award (if applicable) will be retained for historical purposes. Any other data may be removed at an individual’s request.

11.5 THE RIGHT TO RESTRICT PROCESSING

An individual may ask WorldSkills International to stop processing their personal data. WorldSkills International will still hold the data but will not process it any further. This right is an alternative to the right to erasure. If one of the following conditions applies an individual may exercise the right to restrict processing:

1. the accuracy of the personal data is contested;
2. processing of the personal data is unlawful;
3. WorldSkills International no longer needs the personal data for processing but the personal data is required for part of a legal process; and
4. the right to object has been exercised and processing is restricted pending a decision on the status of the processing.

11.6 THE RIGHT TO DATA PORTABILITY

An individual may request their set of personal data be transferred to another controller or processor, provided in a commonly used and machine-readable format. This right is only available if the original processing was on the basis of consent, the processing is by automated means, and if the processing is based on the fulfilment of a contractual obligation.

11.7 THE RIGHT TO OBJECT

An individual has the right to object to WorldSkills International processing of their data where

- processing is based on legitimate interest;
- processing is for the purpose of direct marketing;
- processing is for the purposes of scientific or historic research; and
- processing involves automated decision-making and profiling.