



IMO2024: Data Protection Policy

1. INTRODUCTION & GENERAL PRINCIPLES

- a. International Mathematical Olympiad 2024 (IMO2024) is a charitable programme of Purposeful Ventures, a charity registered in England and Wales with charity number 1204622. For the remainder of this policy, we will refer to IMO2024.
- b. IMO2024 is committed to good practice in the handling of Personal Data and careful compliance with the requirements of the General Data Protection Regulation 2016 (GDPR). We recognise Personal Data as information about a living individual who is identifiable from the data we hold on them.
- c. IMO2024 uses Mailchimp for marketing and communications purposes. Data for all parties at IMO2024 - contestants, leaders, volunteers and all other groups - will be added to the IMO2024 Mailchimp account for ease of communications after first point of contact.
- d. Data for most voluntary organisations essentially amounts to:
 - i. information held on computer;
 - ii. information in relevant manual files;
 - iii. information intended to become part of one of these systems.
- c. As well as text, it can include photos, video and biometric data. It may be held in emails, on phones, tablets, as well as computers and manual filing systems.
- d. Our priority is to avoid causing harm to individuals, by:
 - i. keeping information securely in the right hands;
 - ii. holding good quality information.
- e. We aim to be open and transparent in the way we use Personal Data and will seek to give individuals as much choice as is possible and reasonable over what data is held and how it is used.
- f. The General Data Protection Regulation 2016 (see <https://ico.org.uk/for-organisations/uk-gdpr-guidance-and-resources/data-protection-principles/a-guide-to-the-data-protection-principles/>) contains six basic principles regarding Personal Data, to which IMO2024 will adhere
- g. These require that Personal Data:
 - i. Shall be processed lawfully, fairly and in a transparent manner in relation to the data subject;
 - ii. Collected for specified, explicit and legitimate purpose and not further processed in a manner that is incompatible with these purposes;
 - iii. Adequate, relevant and limited to what is necessary in relation to the purpose for which they are processed;
 - iv. Accurate and, where necessary, kept up to date;
 - v. Kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed;

The International Mathematical Olympiad 2024 in the United Kingdom

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Registered address: IMO 2024, c/o Purposeful Ventures, The Yellow Building, 1 Nicholas Road, London, W11 4AN, UK

- vi. Processed in a manner that ensures appropriate security of the personal data.
- vii. Operational procedures and guidance to staff and volunteers will set out in more detailed ways in which these objectives can be achieved, through our Policy on the Keeping and Disclosure of Personal.

2. RESPONSIBILITIES

- a. IMO2024 recognises its overall legal responsibility for GDPR compliance. Day to day responsibility for Data Protection for IMO2024 is delegated to a nominated Data Protection Officer, who is supported by the responsible individual within Purposeful Ventures. The main responsibilities of the Data Protection Officer are:
 - i. advising the IMO2024 Advisory Committee on Data Protection responsibilities as required;
 - ii. reviewing Data Protection and related policies at appropriate intervals;
 - iii. ensuring that volunteers and staff members have sufficient training in Data Protection matters to carry out their roles within these guidelines;
 - iv. handling any Subject Access requests;
 - v. approving unusual or controversial disclosures of Personal Data;
 - vi. approving contracts with Data Processors.
- b. The Purposeful Ventures' Board have the following responsibilities:
 - vii. assisting the Data Protection Officer in identifying aspects of their area of work that have Data Protection implications so that guidance can be provided as necessary;
 - viii. ensuring that operational procedures take full account of Data Protection requirements;
 - ix. including Data Protection and confidentiality in staff induction and training.
- c. All IMO2024 staff and volunteers are responsible for understanding and complying with policy and procedures that we have adopted in order to ensure GDPR compliance.
- d. In dealing with requests under the GDPR, the Data Protection Officer will:
 - x. ask for the request to be made in writing and forward the relevant form for completion;
 - xi. verify the identity of anyone making a subject access request;
 - xii. respond to the written request within one month.

3. POLICY IN PRACTICE

- a) Personal data will be held only in line with this policy statement.
- b) Personal data will be made available only to the Purposeful Ventures' Board, IMO2024 Advisory Committee, staff, and senior volunteers and then only for the legitimate purposes of the organisation. In relation to contestants, these purposes are the administration of the IMO2024 and providing records of IMO2024 to the official IMO website.
- c) In addition, names with personal contact details of people under the age of 18 will only be made available to those who have undergone a DBS check.
- d) All contestants will be asked to provide consent at point of registration for their name and nationality to be published in the IMO2024 competition programme. Consent will also be sought for name, nationality, gender, and contest score to be provided to the official IMO website. We will not publish or pass on these details without consent.

- e) Other than publication on the official IMO website, commemorative publications and scans of the contestant's scripts, individual records of contestants will not be kept beyond December 2024.
- f) Where sensitive information is requested (e.g. medical, passport etc.) it will not be kept beyond the end of December 2024.
- g) Anyone holding personal data on behalf of, and for the purposes of, IMO2024 is required to keep it secure. This relates to both electronic and hard copies of personal data. In particular, contact details (home addresses, email addresses and phone numbers) should not be stored on laptops or other electronic media which are removed from secure offices unless this is necessary for running one of the organisation's activities.
- h) If any personal information, beyond name and country details, is needed by a volunteer to enable them to fulfil their role, this will be sent electronically as a password encrypted document. The password or pass-phrase will be forwarded to the volunteer in person or by phone or by text.
- i) Volunteers must delete personal information immediately following the end of the competition – unless consent has been given by an individual to keep their information (e.g. for connecting post-event). Limited sharing of information, including photos, with external organisations such as supporters, may take place with consent.
- j) No staff or volunteer will give out names or details of contestants to external parties. If requests are received (e.g. journalistic enquiries) the enquirer will be directed to consult publicly available information only.
- k) Mailing lists will not be supplied to outside organisations and outside individuals.
- l) In the event of any doubt about the correct interpretation of this policy in particular cases, the matter will be referred initially to the organisation's Data Protection Officer for a decision. The Data Protection Officer may make decisions in line with existing policy and subject to the following requirements:
 - a. Any issue related to personal data of those under the age of 18 must be referred to the organisation's designated Child Protection Person before a decision is made.
 - b. The Data Protection Officer must keep a written record of all matters referred to him or her, and the decision taken in each case.
- m) This policy statement will be brought to the attention of all contestants, accompanying adults and observers and IMO2024 volunteers and officials who have access to personal data. It will also be published on the IMO2024 website.
- n) Scans of IMO2024 scripts will be retained indefinitely as a resource for the IMO Ethics Committee, in order that they may defend the integrity of the IMO. This evidence may be brought to the attention of a future IMO Jury in the event that irregular conduct is suspected.