



ICN Privacy Policy

ICN Privacy & Data Protection Policy (2025)

At ICN, we are committed to respecting and protecting your privacy. This policy explains how we collect, use, store, and protect your personal data in compliance with relevant laws, including the **General Data Protection Regulation (GDPR)** and other applicable data protection laws.

By applying for a position, registering your child for a camp, or interacting with ICN services, you agree to the terms outlined in this policy.

1. Introduction

1.1 Purpose of this Policy

We take your privacy seriously and aim to handle your personal data securely and transparently. This Privacy Policy explains how we manage and protect your data, including when we collect it, how we use it, and your rights in relation to your data.

1.2 About Us

ICN is an intermediary organization connecting families, volunteers, and camp providers. We operate primarily through our custom-built system hosted on the **Wix Platform**, and we communicate via **email** and occasionally **WhatsApp** for operational purposes.

1.3 Changes to this Policy

We may update this Privacy Policy from time to time to reflect changes in our practices or regulations. Any updates will be posted on our website. Please check periodically to stay informed about how we are protecting your data.



2. What Data We Collect

2.1 Types of Data

We collect the following types of personal data:

- Contact Information (name, email address, phone number, mailing address)
- Profile Information (for volunteers or staff: resume, references, experience details)
- Camp Registration Information (for parents: child's name, age, health info, emergency contacts)
- Transaction Data (for payment processing: billing details)
- Communication Data (via email, phone, or WhatsApp)
- Usage Data (IP address, browser type, and interaction data on our website for improving our services)

2.2 How We Collect Data

- Directly from you when you submit forms or communicate with us (via email, website, WhatsApp).
- Through our website when you interact with it (e.g., cookies and analytics).
- Through our Wix platform, which hosts our internal systems for staff recruitment and camp registration.

3. How We Use Your Data

We use your data for the following purposes:

- To provide our services: This includes processing camp registrations, staff applications, and volunteer placement.
- **To communicate with you**: This may include emails or WhatsApp messages for service updates, confirmations, or any inquiries.
- **To improve our services**: We analyze how users interact with our website to enhance user experience.
- **For administrative purposes**: This may include managing our website, conducting background checks (for volunteers), and processing payments.

4. Legal Basis for Processing

We rely on the following legal grounds to process your personal data:

- Consent: For actions such as receiving marketing materials or explicit processing of certain personal data.
- Contractual Necessity: To fulfill our agreements, such as processing your camp registration or volunteer
 application.
- Legitimate Interests: To communicate updates, process applications, and ensure safety standards.
- Legal Obligation: To comply with legal requirements such as safeguarding children or reporting any incidents.



5. Data Sharing and Third-Party Providers

5.1 Internal Use

Your data will be used within ICN and may be shared with camp partners only as necessary for the performance of our services.

5.2 Third Parties

We may share your data with trusted third-party service providers who assist us in delivering our services, including payment processing, website analytics, and email communication platforms. These service providers are required to handle your data in compliance with GDPR and other data protection laws.

5.3 Legal Requirements

We may share your personal data if required to do so by law, to protect our rights or the rights of others, or to comply with legal processes.

6. International Data Transfers

6.1 Data Outside the EEA

Although ICN operates primarily within the European Economic Area (EEA), your data may be transferred to countries outside of the EEA, including to third-party providers that help us manage our services. In these cases, we ensure that appropriate safeguards are in place to protect your data.

7. How We Protect Your Data

7.1 Security Measures

We use industry-standard security protocols to protect your data from unauthorized access or disclosure. This includes encryption, secure servers, and restricted access to your information.

7.2 Data Retention

We will retain your personal data for as long as necessary to fulfill the purposes for which it was collected. After that, we may retain certain information for legal or administrative reasons.

8. Your Rights

Under GDPR, you have the following rights regarding your personal data:

- Right to Access: You can request a copy of the personal data we hold about you.
- Right to Rectification: You can ask us to correct any inaccuracies in your personal data.
- Right to Erasure: You can request the deletion of your personal data when it's no longer necessary.
- Right to Restrict Processing: You can ask us to limit how we process your personal data in certain circumstances.
- Right to Object: You can object to the processing of your personal data for specific purposes.
- Right to Data Portability: You can request to receive your data in a commonly used, machine-readable format.
- Right to Withdraw Consent: If we rely on your consent for processing, you can withdraw it at any time.
- **Right to File a Complaint**: If you believe your rights have been violated, you have the right to lodge a complaint with a supervisory authority.



9. Cookies and Tracking

9.1 What are Cookies?

Cookies are small files that are placed on your device when you visit our website. They help us collect data on website usage to improve your experience.

9.2 Types of Cookies

- Session cookies: Temporary cookies that expire when you close your browser.
- Persistent cookies: These remain on your device until they expire or you delete them.

9.3 Managing Cookies

You can manage your cookie preferences through your browser settings. However, disabling cookies may impact your experience on our website.

10. Contact Us

If you have any questions about this Privacy Policy or how we handle your data, you can contact us at:

Email: [Insert email address]Postal Address: [Insert address]

• WhatsApp: [Insert number if applicable]

11. Final Note

We value your trust in us and are committed to handling your data with the utmost care and transparency. By engaging with our services, you're helping us ensure a safe and enjoyable experience for everyone involved.

This policy should be easy to understand while covering all necessary legal and technical details. Let me know if you need further adjustments or clarifications!