



PRIVACY POLICY

STONE SOUP CONSULTING

Nov 2020

Preamble

Stone Soup Consulting, Lda (“Stone Soup Consulting”), a company created under Portuguese law with fiscal number PT 508 742 765 and the owner of the website available at <https://www.stone-soup.net/> (“Website”), is driven by its mission, vision and values.

Our Mission:

- Stone Soup Consulting is a socially-driven international company whose mission is to help optimise organisations and initiatives through collective processes of strategy creation and implementation, so that they achieve their greatest possible impact.

Our Vision:

- At Stone Soup Consulting we believe that efficient organisations will drive more impactful societies.
- This vision goes hand in hand with our style of work. We promote teamwork, participatory decision-making processes, purpose-driven leadership and trust in our client relationship management, among others.
- We strive for a world where all organisations are impact-driven and are effective and efficient in achieving their impact goals, thus ensuring that no one is left behind, and that human society is able to live within the environmental boundaries of our planet.

Our Values:

- Our name is inspired by the stone soup legend. At its essence, this legend symbolizes our mission, vision, and especially our values: collaboration, honesty, integrity, inclusion, diversity, innovation, responsibility, accountability and transparency.

Our commitment to privacy

Our mission and values have led us to introduce privacy practices in our management, which are now consolidating, taking the opportunity offered by Regulation (EU) 2016/679 of the European Parliament and of the Council, of 27 April 2016 (General Data Protection Regulation or “GDPR”) to reinforce our commitment and updating our Privacy Policy.

As the GDPR intends to bring individuals more in control over who has their data, how it is used and how it is accessed, it also brings along new responsibilities and challenges to Stone Soup Consulting as a company that is committed to address to this by reviewing and reinforcing our data protection practices.

This Privacy Policy consolidates a set of commitments made by Stone Soup Consulting for the continuous improvement of its management and the fulfilment of its mission and vision.

Data controller

Stone Soup Consulting acts as the data controller for the processing of the personal data of its clients, consultants and employees, as well as of the visitors of the Website.

If you have any question or you would like any clarification relating to the processing of your personal data by Stone Soup Consulting, please contact us at: stone-soup@stone-soup.net or, alternatively, at:

Rua Manuel Viegas Guerreiro, n.º 1, R/C Esq.
2770-193 Paço de Arcos
Portugal

Types of personal data collected

Personal data is any type of information relating to an identified or identifiable natural person. For example, the name, an identification number, location data, contacts, even elements of individual physical, economic or social identity.

For Stone Soup Consulting, it is also our duty as an enterprise with a social mission to respect the GDPR in our internal work practices and procedures, and in the communication with our stakeholders. How do we do it? Our relationship with our main stakeholders implies having access to and managing data carefully, with respect, by applying the best practices and regulations. We adapt these to our different procedures and communication channels.

Stone Soup seeks to guarantee respect for protection of personal data, collecting the strictly necessary data for the business relationship.

Stone Soup Consulting processes the following data:

- Identification and contact data, such as name, date of birth, telephone number and e-mail address;
- Personal data related to the application form if you are interested in working with us, such as name, e-mail address, address, current job, educational background and other data that your curriculum vitae contains;
- Personal data related to the data subjects in research and evaluation processes carried out by Stone Soup Consulting, which may include socioeconomic data, such as, personal finances, economic conditions information, job title, health related data and religious background.

In addition, we may also obtain personal data by recording how you interact with our Website and we may use technologies like cookies. A cookie is a small text file that a website stores on your computer or mobile device when you visit the site. For more information on our Cookies Policy, please check this [link](#).

The purposes of processing

The processing of personal data is any operation carried out, by automated and non-automated means, on personal data, such as collection, registration, alteration, consultation, use, transmission and destruction, among others.

Stone Soup Consulting processes your personal data for several reasons. We use your information for the following purposes:

- **Research and evaluation processes:** throughout the entire process, i.e. from questionnaires and focus groups to interviews, Stone Soup Consulting processes personal data in order to evaluate the social impact of a certain project, organisation or develop research with information from a certain group of people. For that purpose, personal data is collected from the participants in the research/ evaluation, always based on informed consent of the data subjects. The personal data is processed and consequently anonymized for the issuance of reports or studies.
- **Relationship with clients:** as Stone Soup Consulting frequently needs to have access to information provided by its clients, encompassed with the contract, we sign a Data Protection Agreement that defines the obligations for the Data Controller (the client) and the Data Processor (Stone Soup Consulting).
- **Work applications through the Website:** Stone Soup Consulting community members responsible for the selection and recruitment of candidates have access to the CVs while the process lasts. The personal data is not disclosed openly nor shared with other community members or third parties.
- **E-mail and newsletter registration on the Website:** individuals can sign up for Stone Soup Consulting's newsletter through our Website and regular newsletter. By clicking the submit button in the registration page of our website, they agree to the collection and processing of the data included in the form (Name, Surname, Organisation, Language, Email). Stone Soup Consulting manages and uses these details to send regular information on news, projects, trainings and collaboration opportunities. Stone Soup publicly states that the mailing platform we use is Mailchimp, and that anyone's data will never be sold to third parties. In addition, the newsletter also includes the opportunity to unsubscribe from our mailing database and our direct contact in case you wish to erase your data permanently.
- **Trainings and other corporate events:** each person attending a Stone Soup Consulting related event or training signs a Private Data Consent Form that includes the details on how these details will be used and stored. The data is only used to send updates regarding activities and projects, through our regular newsletter, and is stored in our corporate database. Only the team of partners, administration support staff and communication members of our team have access to them, and they will never be sold to other companies. In addition, anyone can require having their private data changed, limited and permanently deleted from our database by sending us an email, whenever necessary.

Legal basis of processing

Stone Soup Consulting may process your personal data if one of the following applies:

- a) **Consent of the data subjects:** consent shall be given by a clear affirmative act establishing a freely given, specific, informed and unambiguous indication by means of a declaration (in writing or orally) or by an unequivocal positive act (by completing an option). Consent can be withdrawn at any time, without such withdrawal affecting the processing performed while such consent was in force;
- b) **Performance of a contract or pre-contractual procedures:** whenever the processing of personal data is done for the purpose of maintaining the relationship between Stone Soup Consulting and the data subject, or to carry out pre-contractual measures at their request;
- c) **Compliance with a legal obligation:** whenever the processing is necessary to fulfil the legal obligations to which Stone Soup Consulting is subject;
- d) **In the context of a legitimate interest:** whenever it is necessary to process personal data to safeguard the legitimate interests of Stone Soup Consulting or third parties. The legitimate interests of Stone Soup Consulting include, but are not limited to, (i) the exercise of legal and defence rights in the event of legal disputes; (ii) the maintenance of our security, network, infrastructures and technological systems (including access controls).

Disclosure of Data

Stone Soup Consulting shares your personal data with its employees who need them to comply with pre-contractual or contractual obligations.

The obligation of confidentiality on the part of Stone Soup Consulting's employees authorised to access personal data, by virtue of their duties, is laid down in their employment or service contracts and in any event remains in force even after expiration of their duties at the service of Stone Soup Consulting.

We do not share, with third parties, personal data we collect and hold, except as described in this Privacy Policy.

Retention of Data

Stone Soup Consulting maintains the necessary documentation for developing its activity and rendering professional services. We ensure that either files on paper or their electronic versions are kept in a secure place and that access is granted only to authorised people.

Personal data shall be processed and stored for as long as required by the purpose they have been collected for. For example:

- Personal data collected for purposes related to the records of a recruitment process, such as invitations, job offers, number of applications, number of candidates, shall be retained for 5 years (in accordance with Portuguese Law no. 7/2009, of 12 February);
- Personal data collected for the purposes of Stone Soup Consulting's legitimate interests shall be retained as long as needed to fulfil such purposes.

Stone Soup Consulting may be allowed to retain personal data for a longer period whenever:

- You have given consent to such processing, as long as such consent is not withdrawn;
- Required to do so for the performance of a legal obligation or upon order of an authority.

Security measures

It is Stone Soup Consulting's concern to implement measures aimed at an adequate data protection policy to prevent it from destruction, loss, alteration, disclosure or unauthorised access acts or any other form of unlawful treatment. The rigor of the protection measures should be proportional to the level of confidentiality of the protected data.

All the data collected in Stone Soup Consulting activities can only be accessed by designated professionals with a user ID and password. Wherever possible, Stone Soup Consulting uses anonymous information, codes and pseudonyms. In the event of transfer of personal information and / or its supports, special security measures will be taken.

The rights of the data subjects

Data subjects that have their data processed by Stone Soup Consulting have the following rights:

- Right of access** - provision of information on the personal data held by STONE SOUP in relation to the data subject and the respective treatment;
- Right of rectification** - correction, updating or inclusion of information (which may be missing) regarding the data subject;
- Right to erase data ("right to be forgotten")** - erasure of data, having verified the legal requirements for that purpose;
- Right to limitation of processing** - restriction to the processing of data, in the form of (i) suspension of processing, or (ii) limitation of the scope of processing to certain categories of data or purposes of processing;
- Right to portability** - availability of personal data provided by the data subject, in a structured format for current use and automatic reading, so that they can be transmitted to another controller, if technically possible;
- Right to withdraw consent** - withdraw of consent, at any moment, for any data processing carried out based on this ground, without affecting the lawfulness of the processing based on the previously given consent.

- g) **Right not to be subject to automated decision-making** - object to a decision based solely on automated processing, including profiling, unless (i) the decision is necessary for performance of a contract between you and Stone Soup Consulting, (ii) authorized by Union or Member State law, or (iii) based on explicit consent.

Data subjects may exercise the abovementioned rights at any time through a written communication sent to stone-soup@stone-soup.net.

The exercise of these rights is free, unless the request is manifestly unfounded or excessive, in which case a reasonable fee may be charged taking into account the costs incurred by Stone Soup Consulting to satisfy such exercise. The reply to a request shall be provided in writing within a maximum period of 30 days, unless there is a multiplicity of requests or the request is particularly complex. Additional information may be requested by Stone Soup Consulting to confirm the identity of the data subject making the request.

In addition to these rights, Stone Soup Consulting would like to inform you that you have the Right to Complain, i.e. the right to lodge a complaint with the national supervisory authority (www.cnpd.pt), if you consider that we have breached the GDPR or the applicable national legislation regarding your personal rights.

Changes to this Privacy Policy

Stone Soup Consulting reserves the right to make changes to this Privacy Policy at any time by giving notice on this page and possibly by sending a notice to the data subjects who have their data processed by us through e-mail. It is strongly recommended to check this page often, referring to the date of the last modification listed at the bottom.

Should the changes affect processing activities performed on the basis of the data subject's consent, we shall collect new consent from the User, where required.

Last updated on 09-11-2020.



-  www.stone-soup.net
-  [/StoneSoupConsulting/](https://www.facebook.com/StoneSoupConsulting/)
-  [@stonesoupchat](https://twitter.com/stonesoupchat)
-  [Stone Soup Consulting](https://www.linkedin.com/company/Stone Soup Consulting)
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