



WATERSTART

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Privacy Notice

Last updated: [19 January 2026]

1. Introduction

Waterstart Ltd. is an educational charity based in Bermuda. We are committed to protecting the privacy and personal information of everyone we work with, including children and young people, parents and guardians, donors, volunteers, staff, and partners.

This Privacy Notice explains how Waterstart Ltd. collects, uses, shares, and protects personal information in accordance with the Bermuda Personal Information Protection Act 2016 (PIPA).

2. Who We Are

Waterstart Ltd.
Registered charity in Bermuda
23 Seabright Avenue, Paget, DV04 Bermuda
Email: Admissionswaterstart@gmail.com
Phone: 441 537-8137

For the purposes of PIPA, Waterstart Ltd. is the organisation responsible for the personal information described in this Privacy Notice.

3. Personal Information We Collect

We collect only the personal information that is necessary for our charitable and educational purposes.

This may include:

Children and young people

- Name, date of birth, age, and school
- Emergency contact details
- Medical, learning, or accessibility information where required to ensure safety, inclusion, or appropriate support
- Programme participation, attendance, and progress information
- Photographs, video recordings, or audio recordings (with appropriate consent)



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Parents and guardians

- Name and contact details
- Relationship to the child
- Consent forms and communications

Donors, volunteers, and supporters

- Name and contact details
- Donation or volunteering history
- Emergency contact details and basic medical information where necessary to support volunteer safety and emergency response
- Communication preferences

Staff and contractors

- Employment related information required for safeguarding, administration, and legal compliance

4. How We Collect Personal Information

We collect personal information:

- Directly from individuals, parents, or guardians through applications, registration forms, consent forms, and communications
- Through participation in Waterstart programmes and activities
- Via our website, email, and other online platforms
- From schools or partner organisations where appropriate and lawful

5. How We Use Personal Information

We use personal information only for clear, lawful, and charitable purposes, including to:

- Deliver and manage educational programmes
- Safeguard children and young people
- Communicate with participants, parents, guardians, and supporters
- Monitor participation, outcomes, and programme effectiveness
- Meet legal, regulatory, safeguarding, and reporting obligations
- Manage donations, volunteering, and supporter engagement
- Improve our services, communications, and website



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We do not use personal information for purposes that are incompatible with the reason it was collected.

6. Children's Personal Information

Protecting children's personal information is a priority for Waterstart Ltd.

- We collect children's personal information with the knowledge and consent of a parent or legal guardian, unless otherwise permitted by law.
- Access to children's personal information is restricted to authorised staff and volunteers who require it for programme delivery and safeguarding.
- Additional care is taken when using images or stories involving children, in line with our safeguarding practices.

7. Photography, Video, and Media Use

From time to time, Waterstart Ltd. may take photographs, video recordings, or audio recordings of participants during programmes and activities.

As part of participation in a Waterstart programme, parents or legal guardians provide consent on behalf of the participant for Waterstart Ltd. to photograph, film, and record the participant. These media materials may be used for educational, promotional, and outreach purposes, including on Waterstart websites, reports, and online platforms.

To protect privacy, participants' names are not used in connection with images or recordings unless separate and explicit consent has been obtained.

All media materials remain the property of Waterstart Ltd. and are used solely in support of Waterstart's charitable purposes. Media materials are not used for any for profit enterprise.

Withdrawal of Media Consent

Consent for the use of photographs, video recordings, or audio recordings may be withdrawn at any time by the participant or by a parent or legal guardian acting on the participant's behalf.

If consent is withdrawn, Waterstart Ltd. will take reasonable steps to stop using the relevant images or recordings in future publications and, where practicable, to remove them from active use on its websites, online platforms, and promotional materials.

Withdrawal of consent does not affect the lawfulness of any use of media materials that occurred before consent was withdrawn.



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Requests to withdraw media consent or to request removal of images can be made using the contact details set out below.

8. Sharing Personal Information

We do not sell personal information.

Personal information may be shared where necessary and appropriate, including with:

- Waterstart staff, volunteers, and contractors who are subject to confidentiality obligations
- Certifying bodies or training agencies, such as SDI, WFA, or other relevant organisations, where personal information is required to process certifications or qualifications
- Schools and partner organisations involved in programme delivery
- Service providers supporting our operations, such as IT or data storage providers
- Regulators or authorities where required by law

Where personal information is shared, reasonable steps are taken to ensure it is protected.

9. Overseas Transfers

Where personal information is transferred outside Bermuda, Waterstart Ltd. takes reasonable steps to ensure that it receives a level of protection comparable to that required under PIPA.

10. How We Protect Personal Information

We use reasonable physical, technical, and organisational safeguards to protect personal information against loss, misuse, unauthorised access, or disclosure.

These measures include secure digital systems, access controls, staff training, and data minimisation practices.

11. How Long We Keep Personal Information

Personal information is retained only for as long as necessary to fulfil the purposes for which it was collected, or to meet legal, regulatory, or safeguarding requirements.

When personal information is no longer required, it is securely deleted or anonymised.

12. Your Rights Under PIPA



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Under PIPA, individuals, or parents and guardians acting on behalf of children, have the right to:

- Request access to personal information held by Waterstart Ltd.
- Request correction of inaccurate or incomplete personal information
- Withdraw consent for the use of personal information, including photographs, video, and audio recordings
- Ask questions or raise concerns about how personal information is used

Requests may be made using the contact details below.

13. Cookies and Website Use

Our website may use cookies or similar technologies to improve functionality and understand how the site is used. You can manage cookie preferences through your browser settings.

14. Changes to This Privacy Notice

Waterstart Ltd. may update this Privacy Notice from time to time. Any changes will be posted on our website with an updated revision date.

15. Contact Us

If you have any questions, concerns, or requests relating to this Privacy Notice or the handling of personal information, please contact:

Phoebe Barboza-Bellamy- Program Director

Email: Researchwaterstart@gmail.com

Phone: 441 5056612

If you believe your privacy rights have been infringed, you may also contact the Office of the Privacy Commissioner for Bermuda.