

Privacy notice, January 2024

1. Introduction

Under data protection law, individuals have a right to be informed about how Purposeful Ventures uses any personal data that we hold about them. We comply with this right by providing 'privacy notices' (sometimes called 'fair processing notices') to individuals where we are processing their personal data.

This privacy notice explains how we collect, store and use personal data about individuals have contact with Purposeful Ventures in a variety of ways for example, as a member of the public, a donor, a participant on a Purposeful Ventures incubated venture or project. We are committed to being transparent about how we collect and use that data and to meeting our UK data protection obligations.

Purposeful Ventures, The Yellow Building, 1 Nicholas Road, London W11 4AN, is the '**data controller**' for the purposes of UK data protection law.

Our Data Protection Lead is Aisha Washington, Chief Operating Officer (see 'Contact us' below).

Our full privacy notice is detailed below, but the main points to note are:

- We will only ever ask for what we really need to know.
- We will collect and use the personal data that you share with us transparently, honestly and fairly.
- We will always respect your choices around the data that you share with us and the communication channels that you ask us to use.
- We will put appropriate security measures in place to protect the personal data that you share.
- We will never share or sell your data.
- We will only keep it as long as it is required by law and in accordance with our retention schedule defined below

2. Your information: what we collect, use, keep and share

The way we manage the information we might collect about you depends on the capacity in which you contact us, whether you're a stakeholder, partner or professional, a member of the public, someone who may benefit from our services or a donor. The types of personal information we hold on you might include:

- Your full name and title
- Your email address (this may be your personal or organisation email)
- Your address (if relevant)
- Your telephone number (if relevant – this may be your personal or organisation telephone number)
- Your job title (if relevant)
- The name and address of the organisation you work for or are associated with (if relevant)
- Information about your family, health and other life circumstances (if you choose to provide it and if relevant)

- If you work for an organisation, sometimes we also store brief notes about where you may have worked before, any specific preferences you have told us about and your main areas of expertise (e.g. research and policy)
- Other information that you may provide in surveys and interviews with individuals and organisations from the sector.
- Website traffic and newsletter readings: we also store some information to enable us to see how popular pages on our website are and news items in our newsletters. This typically involves assessing aggregate level information, such as IP addresses. Analysing this information allows us to tailor our services to meet your needs.
- Device information: we may collect information about the device you are using to access our services on, including what type of device it is, what operating system you are using, device settings, application IDs, unique device identifiers, and crash data. Whether we collect some or all of this information often depends on what type of device you are using and its settings. Collecting this information enables us to optimise our website for the device you are using.

We will use your information to:

- provide information to you, for example about our programmes;
- manage your marketing preferences;
- if you have signed up for an event with us we will contact you with information on that event;
- ensure that the content of the website is presented in the most effective manner for you and for your device;
- customise our services to your preferences;
- carry out and administer any obligations arising from any agreements entered into between you and us;
- review your application to become a volunteer or for a job role;
- to assist you with being a volunteer for us;
- administer our services and for internal operations, including troubleshooting, information analysis, testing, research, statistical and survey purposes.

We retain your personal data in a live environment for as long as necessary to fulfil the purpose(s) for which it was collected (including as required by applicable law or regulation) and in line with our data retention policy. Where there is a need, personal data is securely archived with restricted access and other appropriate safeguards.

We are required to keep details of financial transactions, including donations, for seven years to meet accountancy and HMRC requirements. We will anonymise or delete personal data if, after a period of seven years, we have not had any contact or communication from you (this will be measured on a rolling seven-year period) – subject to any special circumstances concerning legacies.

We review the personal information (and the categories of personal information) we are holding on a regular basis to ensure the information we are holding is still relevant to our organisation and is accurate. If we discover that certain information we are holding is no longer necessary or accurate, we will take reasonable steps to correct or delete this information as may be required.

You always have the right to request that personal information we hold about you is amended or deleted, please refer to the Your Rights section.

We do not disclose any information you provide to any third parties, other than as follows:

- where you have opted to share any of your information with any other user of our services or third party, you authorise us to deliver that content via email or other communication system.
- where we run a joint event with another organisation. We would only share personal information that is necessary in order to run the event.
- Where we may engage third party companies or individuals, such as third party payment processors, mailing houses etc, to process information on our behalf.
- where information such as email addresses is passed to Ark IT or Soluxion who provide us with technical support;
- if we are under a duty to disclose or share your personal information in order to comply with any legal obligation (for example, if required to do so by a court order or for the purposes of prevention of fraud or other crime);
- we may transfer your personal information to a third party if we merge or restructure but we will take steps to ensure that your privacy rights continue to be protected, (this only applies to information that hasn't already been deleted under the provision stated in the section above);
- to protect our rights, property and safety, or the rights, property and safety of our users or any other third parties. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

Where we do supply your personal information to a third party we will take steps to ensure that your privacy rights are protected and that third party complies with the terms of this notice.

3. Ways we may collect your personal information, including from third parties.

We may collect the following personal information (information that can be uniquely identified with you) about you in the following ways:

- information provided to sign up to any of our services, such as receiving member briefings and updates, joining email lists and networks, or taking part in workshops, conferences and seminars;
- information you may have created or provided through your use of our services, including by email;
- payment information you may provide, or we may need to collect, when you make a donation to us;
- a record of any correspondence between you and us;
- replies to any surveys or questionnaires that we may use for research purposes;
- details of your visits to the website, the resources and pages that you access and any searches you make;
- any information we may require from you when you report a problem or complaint;
- the number of communications you make with us;
- taking photos or making audio or video recordings;
- information you may have provided when requesting advice/guidance.

We may collect information when you choose to supply it to us but please note there may be instances where we process your personal information which has been provided to us by a third party.

Examples of such personal information and where we obtain such information are as follows

- When you donate to us e.g. via Just Giving;
- When you sign up to an event e.g. Eventbrite;
- When you subscribe to a newsletter e.g. MailChimp;
- When you respond to a survey using e.g. Survey Monkey.

If we do obtain your personal information from a third party your privacy rights under this notice are not affected and you are still able to exercise the rights contained within this notice.

4. How do we protect the security of your personal data

We will take all reasonable steps to ensure that appropriate technical and organisational measures are carried out in order to safeguard the information we collect from you and protect against unlawful access and accidental loss or damage.

We will ensure that our employees are aware of their privacy and information security obligations. We will take reasonable steps to ensure that the employees of third parties working on our behalf are aware of their privacy and information security obligations.

This notice and our procedures for handling personal information will be reviewed on a regular basis.

Although we will do our best to protect your personal information, because the transmission of information via the internet is not completely secure, we cannot guarantee the security of your information transmitted to the website or via email; any transmission is at your own risk. Once we have received your information, we will use our strict procedures and security features to try to prevent unauthorised access.

5. How we use cookies

Our website uses cookies to provide you with a good experience when you browse our website. Cookies also help us to improve our website.

A cookie is a small file of letters and numbers that is stored on your browser or device. Cookies contain information that is transferred to your computer's hard drive. Cookies cannot be used by themselves to identify you. You can find more information at www.allaboutcookies.org and www.youronlinechoices.eu if you are located in Europe or www.aboutads.info/choices if in the United States.

We use the following cookies:

- Strictly necessary cookies. These are cookies that are required for the operation of our website. They include, for example, cookies that enable you to log into secure areas of our website.
- Analytical/performance cookies. They allow us to recognise and count the number of visitors and to see how visitors move around our website when they are using it. This helps us to improve the way our website works, for example, by ensuring that users are finding what they are looking for easily.

How to control cookies

You can restrict or block cookies using your browser settings. For instructions on how to control or disable cookies, please visit <https://www.aboutcookies.org.uk/>

6. Your rights and contacting us

- If you would like to update your personal information, or let us know the personal information we hold is incorrect, you can do so by contacting us on the details below.
- You have a right to know how we protect your personal information (as set out in this policy).
- You always have the right to unsubscribe from our newsletter or any other services where we rely on your consent for holding your personal information. We will ensure you are unsubscribed as soon as possible, but at least within one month.
- You also have a right to restrict our use of your personal information and the right to object to your personal information being processed, please contact us on the details below if you wish to do so.
- You have the right to ask us to stop using your personal information in certain ways (as set out in the notice).
- You have the right to ask us to delete your personal information. Unless we have reasonable grounds to refuse to delete your personal information, we will securely delete the personal information in question within one month. The personal information

may continue to exist in certain backups, but we will take steps to ensure that it will not be accessible.

- You have the right to request access to the personal information that we hold about you.
- We will endeavour to comply with such requests as soon as possible but in any event we will comply within one month of receipt (unless a longer period of time to respond is reasonable by virtue of the complexity or number of your requests).
- If a breach is likely to result in a risk to your information rights and freedoms, we will notify you as soon as possible and we may also report it to the ICO.
- If we are unable to resolve any issues you may have or you would like to make a further complaint, you can contact the ICO by visiting <http://www.ico.org.uk> for further assistance.
- Please also feel free to contact us if you have any questions about our Privacy Notice or working practices by email on info@purposefulventure.org.

7. Transferring data internationally

We may share personal information about you with international third parties such as security organisations, or other third-party platforms for collecting and processing information, where different data protection legislation applies.

Where we transfer your personal data to a third-party country or territory, we will do so in accordance with UK data protection law.

In cases where we have to set up safeguarding arrangements to complete this transfer, you can get a copy of these arrangements by contacting us

Examples of the third-party platforms we use are:

- Mail Chimp - [Mailchimp's Legal Policies](#)
- Squarespace - <https://www.squarespace.com/privacy>
- Docusign - <https://www.docusign.com/privacy>

8. Notification of changes to this notice

We will post details of any changes to our policy on the website to help ensure you are always aware of the information we collect, how we use it, and in what circumstances, if any, we share it with other parties.

9. Complaints

We take any complaints about our collection and use of personal information very seriously.

If you think that our collection or use of personal information is unfair, misleading or inappropriate, or have any other concern about our data processing, please raise this with us in the first instance.

Alternatively, you can make a complaint to the Information Commissioner's Office:

- Report a concern online at <https://ico.org.uk/make-a-complaint/>
- Call 0303 123 1113
- Or write to: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF

10. Contact us

If you have any questions, concerns or would like more information about anything mentioned in this privacy notice, please contact our **Data Protection Lead**: Aisha Washington, info@purposefulventures.org.