

**FSE C.I.C.
INVESTOR NETWORK
PRIVACY NOTICE**

CONTENTS

About us
Why this notice is important
Introduction
How we collect personal data
The types of personal data we use and how we use them
Change of purpose
Marketing
Automated decision making/profiling
Sharing personal data
Transfers of personal data outside the EEA
Security
How long we keep your personal data
Your rights
You can decide not to provide personal data
Complaints and questions
How to contact us
Changes to this privacy notice

ABOUT US

When we say **FSE** or **we** in this privacy notice we mean FSE C.I.C.

FSE C.I.C. is a community interest company, registered in England. Its company number is 04463599. Its registered office is at Riverside House 4 Meadows Business Park, Station Approach Blackwater, Camberley, Surrey, GU17 9AB.

FSE C.I.C. is the controller of the personal data collected from individuals for the purposes of the FSE Investor Network.

FSE C.I.C. is registered with the UK Information Commissioner under number Z6964923.

WHY THIS NOTICE IS IMPORTANT

Please read this privacy notice carefully. It sets out:

- how we use personal data; and
- the rights of individuals whose personal data we use.

The members of the FSE Group have separate privacy notices for different categories of people, e.g. visitors to its website, individual investors, contacts at its funders, contacts at the companies in which it invests, etc.

Please read this privacy notice together with any other privacy notice members of the FSE Group may provide for specific circumstances when they process your personal data. This privacy notice supplements those other notices; it does not replace them.

INTRODUCTION

Personal data is information about an identifiable individual (a human being) called a data subject.

Anonymous or anonymised data is **not** personal data.

This privacy notice applies to personal data about individuals who:

- enquire about the FSE Investor Network;

- apply to join the FSE Investor Network;
- are members of the FSE Investor Network;
- are contacts, officers or employees of a target business looking for investment, a loan or other support;
- are individuals who introduce potential investors and/or target businesses to the members of the FSE Group (**Introducers**);
- register to attend a meeting of the FSE Investor Network; or
- attend a meeting of the FSE Investor Network.

This privacy notice applies where we control how your personal data is used.

This privacy notice does **not** apply where we process your personal data for someone else (**the controller**) who controls how your personal data is used. In that case we are obliged to process your personal data on the controller's instructions and the controller's privacy notice, policy or statement, or other information given to you by the controller, applies.

Data protection law obliges us to:

1. use your personal data lawfully, fairly and transparently;
2. collect your personal data only for purposes which we have explained to you, and not use it in any way which is incompatible with those purposes;
3. collect and use your personal data only if it is needed for those purposes;
4. keep your personal data for no longer than it is needed for those purposes;
5. keep your personal data accurate and up to date; and
6. keep your personal data securely.

HOW WE COLLECT PERSONAL DATA

The data we collect depends on whether you:

- have made an enquiry about the FSE Investor Network;
- have applied to join the FSE Investor Network or are a member of the FSE Investor Network;
- are a contact, officer or employee of a target business looking for investment a loan or other support;
- are an individual who introduces potential investors and/or target businesses to members of the FSE Group;
- register to attend a meeting of the FSE Investor Network or attend a meeting of the FSE Investor Network.

The sources of your personal data are set out in the table below.

TYPES OF PERSONAL DATA AND HOW WE USE THEM

The table below sets out:

- the personal data we collect and use;
- the purposes for which we use it; and
- the lawful basis we rely on.

Where the lawful basis is our legitimate interests or the legitimate interests of someone else, we have also indicated what those interests are.

We may have more than one lawful basis. Please [contact us](#) if you want to know which basis applies.

INDIVIDUALS WHO ENQUIRE ABOUT THE FSE INVESTOR NETWORK			
PERSONAL DATA	PURPOSES	THE LAWFUL BASIS	SOURCE
Your name and contact details (e.g. email address and phone number(s)) A record of your enquiry and of our response	To deal with your enquiry To deal with any request from you to exercise your rights as a data subject and to check your identity	Our legitimate interests in managing the FSE Investor Network Our legitimate interests in dealing with your enquiry To comply with our legal obligations	You Our records
Records of consents and withdrawals of consents Records of suppression of personal data	To ensure that we have your consent where necessary To ensure that we act on your withdrawal of consent To deal with any request from you to exercise your rights as a data subject	To comply with our legal obligations	You
Further information necessary to verify your identity	To check your identity should you choose to exercise your rights as a data subject	To comply with our legal obligations	You
INDIVIDUALS WHO APPLY TO JOIN OR ARE MEMBERS OF THE FSE INVESTOR NETWORK			
Your name, address, email address, phone number(s) and other contact details in the form completed by you when registering to join the FSE Investor Network, or when you update your details	To register you as a member of the FSE Investor Network To invite you to meetings of the FSE Investor Network To communicate with you about meetings, including sending you updates and cancellations, travel instructions and accessibility information	To perform our contract with you or to take steps at your request with a view to entering into that contract Our legitimate interests in managing the FSE Investor Network, including holding meetings The legitimate interests of businesses looking for investment, a loan or other support in potential investors receiving information about them and being introduced to potential investors The legitimate interests of funders in the FSE Investor Network finding matched funding to help small businesses and the economy grow The interests of the public in small businesses being provided with resources to help them and the economy grow	You Introducers

	<p>To send you the FSE Group's newsletter, or information about investment opportunities, events and activities of the members of the FSE Group (if you have asked us to do that)</p> <p>Please see the Marketing section below</p> <p>To deal with any request from you to exercise your rights as a data subject and to check your identity</p>	<p>Our legitimate interests and those of other members of the FSE Group in marketing and publicising our/their business</p> <p>The legitimate interests of businesses looking for investment, a loan or other support in potential investors receiving information about them and being introduced to potential investors</p> <p>The legitimate interests of funders in the FSE Investor Network finding matched funding to help small businesses and the economy grow</p> <p>The interests of the public in small businesses being provided with resources to help them and the economy grow</p> <p>To comply with our legal obligations</p>	
Information about your background and career and your motivation in investing	To verify that you are a sophisticated investor,	To comply with our legal obligations	You
Details of previous investments	To verify that you are a sophisticated investor	To comply with our legal obligations	You
Funds you have available for investment and the size of investment you are looking to make	<p>To match potential investors with businesses in which they may be interested in investing or supporting</p> <p>To verify that you are a high net worth individual</p>	<p>Our legitimate interests in managing the FSE Investor Network</p> <p>The legitimate interests of businesses looking for investment, a loan or other support in potential investors receiving information about them and being introduced to potential investors</p> <p>The legitimate interests of funders in the FSE Investor Network finding matched funding to help small businesses and the economy grow</p> <p>The interests of the public in small businesses being provided with resources to help them and the economy grow</p>	<p>You</p> <p>Introducers</p>
Types of businesses in which you are interested in investing	To match potential investors with businesses in which they	Our legitimate interests in managing the FSE Investor Network	<p>You</p> <p>Introducers</p>

	may be interested in investing	<p>The legitimate interests of businesses looking for investment, a loan or other support in potential investors receiving information about them and being introduced to potential investors</p> <p>The legitimate interests of funders in the FSE Investor Network finding matched funding to help small businesses and the economy grow</p> <p>The interests of the public in small businesses being provided with resources to help them and the economy grow</p>	
Whether you are willing to be part of a syndicate	To match members of the potential investors with businesses in which they may be interested in investing	<p>Our legitimate interests in managing the FSE Investor Network</p> <p>The legitimate interests of businesses looking for investment, a loan or other support in potential investors receiving information about them and being introduced to potential investors</p> <p>The legitimate interests of funders in the FSE Investor Network finding matched funding to help small businesses and the economy grow</p> <p>The interests of the public in small businesses being provided with resources to help them and the economy grow</p>	<p>You</p> <p>Introducers</p>
The sort of involvement you would like with any business in which you invest	To match potential investors with businesses in which they may be interested in investing	<p>Our legitimate interests in managing the FSE Investor Network</p> <p>The legitimate interests of businesses looking for investment, a loan or other support in potential investors receiving information about them and being introduced to potential investors</p> <p>The legitimate interests of funders in the FSE Investor Network finding matched funding to help small businesses and the economy grow</p> <p>The interests of the public in small businesses being provided with resources to help them and the economy grow</p>	<p>You</p> <p>Introducers</p>
Information about your skills	To match potential investors with businesses in which they may be interested in investing	<p>Our legitimate interests in managing the FSE Investor Network</p> <p>The legitimate interests of businesses looking for investment, a loan or other support in potential investors receiving information about them and being introduced to potential investors</p>	<p>You</p> <p>Introducers</p>

		<p>The legitimate interests of funders in the FSE Investor Network finding matched funding to help small businesses and the economy grow</p> <p>The interests of the public in small businesses being provided with resources to help them and the economy grow</p>	
A certificate that you are a high net worth individual or a self-certified sophisticated investor	To allow us to inform you about investment opportunities	To comply with our legal obligations	You
Your CV or biographical information	To match potential investors with businesses in which they may be interested in investing	<p>Our legitimate interests in managing the FSE Investor Network</p> <p>The legitimate interests of businesses looking for investment, a loan or other support in potential investors receiving information about them and being introduced to potential investors</p> <p>The legitimate interests of funders in the FSE Investor Network finding matched funding to help small businesses and the economy grow</p> <p>The interests of the public in small businesses being provided with resources to help them and the economy grow</p>	<p>You</p> <p>Social media</p> <p>Introducers</p>
Expressions of interest in investing	To match potential investors with businesses in which they may be interested in investing	<p>Our legitimate interests in managing the FSE Investor Network</p> <p>The legitimate interests of businesses looking for investment, a loan or other support in potential investors receiving information about them and being introduced to potential investors</p> <p>The legitimate interests of funders in the FSE Investor Network finding matched funding to help small businesses and the economy grow</p> <p>The interests of the public in small businesses being provided with resources to help them and the economy grow</p>	You
Personal data provided to us about the progress of any deal or the size or nature of an investment	<p>To provide assistance with the deal</p> <p>To manage fund raising</p>	<p>Our legitimate interests in managing the FSE Investor Network</p> <p>The legitimate interests of businesses looking for investment, a loan or other support in potential investors receiving investment, a loan or other support</p> <p>The legitimate interests of funders in the deals being concluded to help small businesses and the economy grow</p>	<p>You</p> <p>Other members of the FSE Group</p> <p>Other investors (if any)</p> <p>The target business and its advisers</p>

		The interests of the public in small businesses being provided with resources to help them and the economy grow	
Investments and loans you have made	To help assess what investments you may be interested in and to invoice you	Our legitimate interests in managing the FSE Investor Network The legitimate interests of businesses looking for investment, a loan or other support in potential investors receiving investment, a loan or other support The legitimate interests of funders in the deals being concluded to help small businesses and the economy grow The interests of the public in small businesses being provided with resources to help them and the economy grow	You Other members of the FSE Group Other investors (if any) The target business
Feedback from you on our services and those of other members of the FSE Group	To help us improve our future services and those of other members of the FSE Group To deal with any complaints	Our legitimate interests in running our business. The legitimate interests of other members of the FSE Group in running their businesses Our legitimate interests in dealing with your complaint	You
Records of consents and withdrawals of consents Records of suppression of personal data	To ensure that we have your consent where necessary To ensure that we act on your withdrawal of consent To deal with any request from you to exercise your rights as a data subject	To comply with our legal obligations	You
Records of other communications with you	To engage with you and to make arrangements with you To deal with any request from you to exercise your rights as a data subject and to check your identity	To perform our contract with you or to take steps with a view to entering into that contract To comply with our legal obligations	You Our records Another member of the FSE Group
Further information necessary to verify your identity	To check your identity should you choose to exercise your rights as a data subject	To comply with our legal obligations	You
CONTACTS, OFFICERS AND EMPLOYEES OF TARGET BUSINESSES LOOKING FOR INVESTMENT, A LOAN OR OTHER SUPPORT			

<p>Your name and contact details</p>	<p>To provide your business with information about potential investors and introduce you to potential investors</p> <p>To invite you to meetings of the FSE Investor Network</p> <p>To communicate with you about meetings, including sending you updates and cancellations, travel instructions and accessibility information</p> <p>To send you the FSE Group's newsletter, or information about investment opportunities, events and activities of the FSE Group (if you have asked us to do that)</p> <p>Please see the Marketing section below</p> <p>To deal with any request from you to exercise your rights as a data subject and to check your identity</p>	<p>Our legitimate interests in managing the FSE Investor Network, including holding meetings</p> <p>The legitimate interests of your business in receiving information about potential investors and being introduced to potential investors</p> <p>The legitimate interests of funders in funding being provided to help small businesses and the economy grow</p> <p>The interests of the public in small businesses being provided with resources to help them and the economy grow</p> <p>Our legitimate interests and those of other members of the FSE Group in marketing and publicising our/their business</p> <p>The legitimate interests of your business in receiving information about potential funding</p> <p>The legitimate interests of funders in funding being provided to help small businesses and the economy grow</p> <p>The interests of the public in small businesses being provided with resources to help them and the economy grow</p> <p>To comply with our legal obligations</p>	<p>Other members of the FSE Group</p>
<p>Your CV or biographical information</p>	<p>To match potential investors with businesses in which they may be interested in investing</p> <p>To provide information to attendees at a meeting of the FSE Investor Network at which you present</p>	<p>Our legitimate interests in managing the FSE Investor Network</p> <p>The legitimate interests of potential investors in being introduced to businesses looking for investment</p> <p>The legitimate interests of your business in being introduced to potential investors</p>	<p>Your company or other organisation</p> <p>Other members of the FSE Group</p>
<p>Personal data you include in any presentation or handouts or other information you provide</p>	<p>To provide information to members of the FSE Investor Network</p>	<p>Our legitimate interests in managing the FSE Investor Network, including holding meetings</p>	<p>You</p> <p>Your employer or company</p>

		The legitimate interests of attendees in receiving information The legitimate interests of your business in being introduced to potential investors	
Feedback from you on our services and those of other members of the FSE Group	To help us improve our future services and those of other members of the FSE Group To deal with any complaints	Our legitimate interests in managing the FSE Investor Network, including holding meetings The legitimate interests of other members of the FSE Group in running their businesses Our legitimate interests in dealing with your complaint	You
Records of consents and withdrawals of consents Records of suppression of personal data	To ensure that we have your consent where necessary To ensure that we act on your withdrawal of consent To deal with any request from you to exercise your rights as a data subject	To comply with our legal obligations	You
Records of other communications with you	To engage with you and to make arrangements with you To deal with any request from you to exercise your rights as a data subject and to check your identity	Our legitimate interests in managing the FSE Investor Network, including holding meetings To comply with our legal obligations	You Our records Another member of the FSE Group
Further information necessary to verify your identity	To check your identity should you choose to exercise your rights as a data subject	To comply with our legal obligations	You
INDIVIDUALS WHO INTRODUCE POTENTIAL INVESTORS AND/OR TARGET BUSINESSES			
Your name and contact details, and where you work	To register you as a member of the FSE Investor Network To communicate with you about potential investments	Our legitimate interests in managing the FSE Investor Network The legitimate interests of businesses looking for investment, a loan or other support in receiving information about potential investors and being introduced to potential investors The legitimate interests of funders in funding being provided to help small businesses and the economy grow	Your company or business Other introducers and mutual contacts

		<p>The interests of the public in small businesses being provided with resources to help them and the economy grow</p> <p>To comply with our legal obligations</p>	
	<p>To deal with any request from you to exercise your rights as a data subject and to check your identity</p>		
Feedback from you on our services and those of other members of the FSE Group	<p>To help us improve our future services and those of other members of the FSE Group</p> <p>To deal with any complaints</p>	<p>Our legitimate interests in running our business.</p> <p>The legitimate interests of other members of the FSE Group in running their businesses</p> <p>Our legitimate interests in dealing with your complaint</p>	You
Records of consents and withdrawals of consents Records of suppression of personal data	<p>To ensure that we have your consent where necessary</p> <p>To ensure that we act on your withdrawal of consent</p> <p>To deal with any request from you to exercise your rights as a data subject</p>	To comply with our legal obligations	You
Records of other communications with you	<p>To engage with you and to make arrangements with you</p> <p>To deal with any request from you to exercise your rights as a data subject and to check your identity</p>	<p>Our legitimate interests in managing the FSE Investor Network</p> <p>To perform our contract (if any) with you or to take steps to enter into that contract</p> <p>To comply with our legal obligations</p>	<p>You</p> <p>Our records</p> <p>Another member of the FSE Group</p>
Further information necessary to verify your identity	To check your identity should you choose to exercise your rights as a data subject	To comply with our legal obligations	You
INDIVIDUALS WHO REGISTER TO ATTEND OR ATTEND A MEETING OF THE FSE INVESTOR NETWORK OR WHO ATTEND A SYNDICATE MEETING			
PERSONAL DATA	PURPOSES	THE LAWFUL BASIS	SOURCE

<p>Your name, address, email address, phone number(s) and other contact details and other information (such as dietary information) you provide when you register to attend the meeting</p>	<p>To register you as an attendee at the meeting</p> <p>To communicate with you about the meeting, including sending you updates and cancellations, travel instructions and accessibility information</p> <p>To invite you to future meetings</p> <p>To send you the FSE Group's newsletter, or information about investment opportunities, events and activities of the FSE Group (if you have asked us to do that)</p> <p>Please see the Marketing section below</p> <p>To deal with any request from you to exercise your rights as a data subject and to check your identity</p>	<p>Our legitimate interests in managing the FSE Investor Network, including holding the meeting</p> <p>To perform our contract with you or to take steps at your request to enter into that contract</p> <p>The legitimate interests of businesses looking for investment, a loan or other support in receiving information about potential investors and being introduced to potential investors</p> <p>The legitimate interests of funders in funding being provided to help small businesses and the economy grow</p> <p>The interests of the public in small businesses being provided with resources to help them and the economy grow</p> <p>To comply with our legal obligations, e.g. under public health and safety legislation</p> <p>Our legitimate interests and those of other members of the FSE Group in marketing and publicising our/their business</p> <p>Our legitimate interests and those of other members of the FSE Group in marketing and publicising our/their business</p> <p>The legitimate interests of your business in receiving information about the FSE Investor Network</p> <p>The legitimate interests of funders in funding being provided to help small businesses and the economy grow</p> <p>The interests of the public in small businesses being provided with resources to help them and the economy grow</p> <p>To comply with our legal obligations</p>	<p>You</p>
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Feedback from you on the meeting and our services and those of other members of the FSE Group	To help us improve our meetings and services and those of other members of the FSE Group To deal with any complaints	Our legitimate interests in managing the FSE Investor Network The legitimate interests of other members of the FSE Group in running their businesses Our legitimate interests in dealing with your complaint	You
Records of consents and withdrawals of consents Records of suppression of personal data	To ensure that we have your consent where necessary To ensure that we act on your withdrawal of consent To deal with any request from you to exercise your rights as a data subject	To comply with our legal obligations	You
Records of other communications with you	To engage with you and to make arrangements with you To deal with any request from you to exercise your rights as a data subject and to check your identity	Our legitimate interests in managing the FSE Investor Network, including holding the meeting To perform our contract with you or to take steps to enter into that contract To comply with our legal obligations	You Our records Another member of the FSE Group
Further information necessary to verify your identity	To check your identity should you choose to exercise your rights as a data subject	To comply with our legal obligations	You
Details of meetings you have attended	To help assess which investments you may be interested in In the case of syndicate meetings to track the progress of the deal	Our legitimate interests in managing the FSE Investor Network The legitimate interests of other members of the FSE Group in running their businesses To perform our contract with you or to take steps at your request to enter into that contract The legitimate interests of businesses looking for investment, a loan or other support in receiving information about potential investors and being introduced to potential investors	Our records Another member of the FSE Group

		<p>The legitimate interests of funders in funding being provided to help small businesses and the economy grow</p> <p>The interests of the public in small businesses being provided with resources to help them and the economy grow</p>	
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Special Categories of Personal Data: These are information about race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data.

We do **not** collect or use this kind of data about individuals who enquire about the FSE Investor Network, have applied to join or are members of the FSE Investor Network, who are contacts, officers or employees of a target business looking for funding, who introduce potential investors and/or target businesses to members of the FSE Group, or who register to attend or attend meetings of the FSE Investor Network.

Convictions and Offences: We do **not** collect or use this kind of data about individuals who enquire about the FSE Investor Network, have applied to join or are members of the FSE Investor Network, who are contacts, officers or employees of a target business looking for funding, who introduce potential investors and/or target businesses to members of the FSE Group, or who register to attend or attend meetings of the FSE Investor Network.

Aggregated Data: We may collect, use and share aggregated data such as statistical or demographic data for any purpose. Aggregated Data may be derived from your personal data but is not personal data because it does **not** directly or indirectly identify you.

If we combine or connect any aggregated data with personal data so that we can identify you, we will use the combined data in accordance with this privacy notice.

CHANGE OF PURPOSE

We will not use personal data for a new purpose unless:

- the new purpose is compatible with the original purpose;
- we contact you to explain the lawful basis for the new purpose; or
- we anonymise the personal data and use it for research or statistical purposes.

MARKETING

We may send you marketing materials by post, but you can opt out of that at any time.

We may send you emails or texts about meetings of the FSE Investor Network but you can unsubscribe at any time.

Otherwise we will not send unsolicited marketing emails or texts without your consent except:

- a) we may invite you to FSE Investor Network events if you have previously enquired about, registered for or attended one of our events;
- b) where you have asked us to send you invitations to events, the FSE Group newsletter or news about the activities of members of the FSE Group or about investment opportunities, but you can unsubscribe from those at any time.

We do not make unsolicited marketing phone calls, but we may phone you to let you have information about meetings of the FSE Investor Network or investment opportunities if you have asked us to that. You can ask us to stop doing that at any time.

We do not share personal data with anyone outside the FSE Group for marketing purposes.

AUTOMATED DECISION MAKING AND PROFILING

We do not use information about individuals who enquire about the FSE Investor Network, have applied to join or are members of the FSE Investor Network, who are contacts, officers or employees of a target business looking for funding, who introduce potential investors and/or target businesses to members of the FSE Group, or who register to attend or attend meetings of the FSE Investor Network in order to make automated decisions, including profiling.

SHARING PERSONAL DATA

We may share your personal data with:

- Other members of the FSE Group for the purposes of matching members of the FSE Investor Network with businesses in or to which other members of the FSE Group are interested in investing, providing a loan or supporting in some other way.
- Members of the FSE Investor Network who may be interested in investing in or providing a loan to the business for which you work.
- Other members of the FSE Investor Network who are interested in making investments involving a number of investors (but only your name, phone number, email address and postal address).
- Members of our credit or investment committees.
- Someone who wants to acquire or acquires the business of the FSE Investor Network.

If our business assets are acquired, personal data will be one of the assets transferred to the acquirer.

- Any business we merge with.
- Any company or business we acquire.
- Anyone we use to process personal data for us, such as the host of our IT systems.

That person will be obliged to:

- use your personal data only for our purposes;
- process it only on our instructions; and
- have appropriate security measures in place to protect the data.

For details of the people we currently use to process personal data for us please click [here](#).

- Our consultants, contractors and other suppliers who have a need to know in order to perform their obligations to us.
- Our funders, companies in which we invest or to which we lend and other customers.
- Our professional advisers. They are obliged to keep it confidential.
- The police and other law enforcement agencies.
- The Information Commissioner's Office and anyone else if the law obliges us to disclose your personal data to them.
- Anyone else to protect our rights and property or to protect the rights or property of someone else.

TRANSFERS OF PERSONAL DATA OUTSIDE THE EEA

Our staff and other members of the FSE Group may access your personal data when they are outside the European Economic Area, but the same safeguards will apply as if they were accessing your personal data from within the European Economic Area.

We will not your transfer personal data outside the European Economic Area unless at least one of the following applies:

- a) We transfer it to a country which the European Commission has decided ensures an adequate level of protection for personal data or if the recipient has entered into the Standard Contractual Clauses published by the European Commission. If you wish to see a copy of the Standard Contractual Clauses, please [contact us](#).
- b) You have given your explicit consent to the transfer of your personal data. (If you have given that consent you may withdraw it at any time by [contacting us](#).)
- c) We cannot perform our contract with you without making that transfer.
- d) We cannot take steps you have requested us to take without making that transfer.
- e) We cannot enter into or perform a contract with someone else and which is in your interests without making that transfer.
- f) The transfer is necessary for important reasons of public interest.
- g) The transfer is necessary for the establishment, exercise or defence of legal claims.

SECURITY

We have appropriate security measures to prevent personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed.

We limit access to personal data to those of our officers, employees, agents, contractors service providers and other people who have a business need to know.

They will process your personal data on only on our instructions and they are subject to a duty of confidentiality.

Where we share any personal data with another controller, that other controller is responsible for keeping the personal data which it receives from us secure.

We have procedures to deal with any suspected personal data breach and will tell the Information Commissioner's Office and you of a breach of security involving your personal data if the law obliges us to do that.

HOW LONG WE KEEP PERSONAL DATA

We keep personal data only for:

- as long as is necessary to achieve our stated purpose(s);
- as the law requires; or
- as required for to meet any legal, accounting, or reporting requirements.

The law requires us to keep information about our clients and customers (including their contact details, details of their identity, financial information and information about transactions with them) for six years after they cease being customers.

Please [contact us](#) if you want to see a copy of our data retention and deletion policy.

In some circumstances you can ask us to delete your personal data. Please see Your Rights – next paragraph.

If we anonymise your personal data, it will no longer be personal data and we may keep and use it indefinitely.

YOUR RIGHTS

Access

You can ask us to confirm whether we hold or use your personal data. If we do hold your personal data, you can ask us for a copy of it.

Correction

You can have incomplete or incorrect personal data corrected.

We may need to check the accuracy of any new data you give to us.

Erasure (the right to be forgotten)

You can ask us to delete your personal data if we have no good reason to continue using it.

You can also ask us to delete your personal data if:

- you have objected to our using it (see below);
- we have used your personal data illegally; or
- we must delete your personal data to comply with the law.

We may not always be able to comply with your request for legal reasons. We will tell you about those if you request us to delete your personal data.

Restriction

You can ask us to suspend our use of your personal data in the following circumstances:

- if you want us to establish the data's accuracy;
- if our use of your personal data is illegal, but you do not want us to delete it;
- if you need us to hold the data in connection with a legal claim, but we do not need it; or
- you have objected to our use of your personal data, but we need to check whether we have overriding legitimate reasons to use it.

Object to the processing of your personal data

If our basis for using your personal data is our legitimate interests or someone else's legitimate interests (see the table above), and you think that affects your rights, you can object to our using your personal data.

In some cases, we may show that we have compelling legitimate grounds to use your personal data and that those grounds override your rights.

Object to the use of your personal data for direct marketing purposes

You can object if we use your personal data for direct marketing purposes.

Withdraw consent

If you have given consent for us to use your personal data, you can withdraw that consent at any time.

If you withdraw your consent, that will not affect our earlier use of your data with your consent.

Transfer of personal data (data portability)

If you gave your personal data to us and:

- you consented to our using your personal data; or

- we used that personal data to perform a contract with you

and we have processed that data electronically, you can ask us to send your personal data to you or to someone else.

How to exercise your rights

Please [contact us](#) at the address given below to exercise your rights.

We try to respond to all requests within a month. It may take us longer if things are complicated or you have made a lot of requests, but we will let you know what is happening.

Normally you do not have to pay to exercise your rights, we may charge a reasonable fee if your request is unfounded, repetitive or excessive.

Or we may refuse to comply with your request in those circumstances.

We may need you to provide more information to check your identity.

We may ask you for further information in order to comply with your request.

YOU CAN DECIDE NOT TO PROVIDE PERSONAL DATA

You can decide not to give us personal data.

If you do not provide data which we need to provide a service, we may not be able to provide that service.

If you do not provide data which we need to check your identity, we may not be able to comply with your request to exercise your rights.

COMPLAINTS AND QUESTIONS

If you think we are using your personal data is unfairly or we are misleading you, please let us know.

It is important that your personal data is accurate and up to date. Please let us know if your personal data changes.

We also welcome suggestions for improving our procedures.

Please let us know if you want more information about how we use your personal data.

You have the right to make a complaint about the way we have used your personal data to the UK Information Commissioner's Office at: The Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF or www.ico.org.uk.

Or you can go to court.

Please [contact us](#) and give us a chance to set things right before you contact the Information Commissioner's Office or go to court.

HOW TO CONTACT US

If you have any questions about this privacy notice, you want to exercise your rights, or you want to make a complaint, please:

- email <mailto:privacy@thefsegroup.com>
- write to us at FSE C.I.C., Riverside House, 4 Meadows Business Park, Station Approach, Blackwater, Camberley GU17 9AB.

CHANGES TO THIS PRIVACY NOTICE

This privacy notice was last updated on 1st February 2021

If we change how we use your personal data, we will let you know, either by posting a notice on our website or sending you an email.

If you don't agree to the changes, you can stop giving us personal data.