

## THE FSE GROUP FUNDS PRIVACY NOTICE

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### ABOUT US AND WHAT WE DO

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 registered with the UK Information Commissioner under number Z6964923.

The FSE Group is made up of several companies and businesses. You can find a list of the members of the FSE Group [here](#).

When we say **FSE** or **we** in this privacy notice we mean the member of the FSE Group which controls the use of your personal data.

We provide fund management and related services to public bodies who are looking to invest in or provide loans or grants to small and medium sized enterprises (SMEs). We invest in, make loans and grants and provide support to SMEs. We also run a business angel network.

Different members of the FSE Group manage different funds.

Please [contact us](#) if you want to know which members of the FSE Group control the use of your personal data.

### 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, individuals on its mailing lists, members of its angel network, individual investors, etc. These notices are published on this website.

Please read this privacy notice together with any other privacy notice we may provide for specific circumstances when we 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:

- make a general enquiry about any of our funds, including about investing any fund and any support we may be able to provide to their business;
- are individuals who are interested in investing in one of our funds or have invested in one of our funds;
- are contacts, officers or employees of any organisation interested in providing funding or investing in one of our funds or of any of our funding providers or investors;
- are contacts, officers or employees of a business looking for or which has received investment, a loan or other support;
- have given or offered to give a guarantee or other security; or
- are individuals who introduce potential investors and/or businesses to the members of the FSE Group (**Introducers**).

This privacy notice applies where one or more members of the FSE Group control how your personal data is used.

This privacy notice does **not** apply where we process 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, statement, or 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 a general enquiry about any of our funds;
- are an individual who is interested in being or is an investor;
- are a contact, officer or employee of a business looking for investment a loan or other support;
- are a contact, officer or employee of a business which has applied for or received funding, investment or other support;
- are an individual who has given or offered to give a guarantee or other security; or
- are an individual who introduces potential investors and/or businesses which are looking for investment, a loan or other support to members of the FSE Group;

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

**Cookies:** We use cookies and similar technologies to collect information about the equipment of visitors to our website and their use of our website. Via Google Analytics we collect data such as time zone setting, location, browser plug in types and versions, operating

systems, what network you are using, whether you have been referred from another site or social media. As we do not collect an IP address there is no way of us linking any data we record with you.

Please see our [Cookie Notice](#) for more information.

**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.

<b>INDIVIDUALS WHO MAKE A GENERAL ENQUIRY ABOUT OUR FUNDS</b>			
<b>PERSONAL DATA</b>	<b>PURPOSES</b>	<b>THE LAWFUL BASIS</b>	<b>SOURCE</b>
<p>Your name and contact details (e.g. email address and phone number(s)) and any other details you provide to us</p> <p>A record of your enquiry and of our response</p>	<p>To deal with your enquiry</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 our funds</p> <p>Our legitimate interests in dealing with your enquiry</p> <p>Your legitimate interests or those of your business in our dealing with your enquiry</p> <p>To comply with our legal obligations</p>	<p>You</p> <p>Our records</p>
<p>Records of consents and withdrawals of consents</p> <p>Records of suppression of personal data</p>	<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>	<p>To comply with our legal obligations</p>	<p>You</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
Your relationship (e.g. employee, director, shareholder or guarantor) with any organisation on our database	To check your identity and position declared	Our legitimate interests in dealing with your enquiry	You  Our records  Another member of the FSE Group

**INDIVIDUALS WHO ARE INTERESTED IN INVESTING OR HAVE INVESTED IN ONE OF OUR FUNDS**

Your name, address, email address, phone number(s) and other details you provide to us, or when you update your details	<p>To register your interest</p> <p>To communicate with you, including informing you about potential opportunities and reporting on the performance of any fund in which you have invested</p> <p>To send you the FSE Group's newsletter, or information about investment opportunities, events</p>	<p>Our legitimate interests in managing our funds</p> <p>To perform a contract with you or to take steps at your request with a view to entering into that contract</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 our funders 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>Our legitimate interests and those of other members of the FSE Group in marketing and publicising our/their business</p>	<p>You</p> <p>Introducers</p>
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	<p>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 invite you to meetings of the FSE Investor Network</p> <p>(Please see our <a href="#">Investor Network Privacy Notice</a>)</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>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, and to carry out anti-money laundering checks	<p>To comply with our legal obligations</p> <p>To perform a contract with you or to take steps at your request with a view to entering into that contract</p>	You
Details of previous investments	To verify that you are a sophisticated investor, and to carry out anti-money laundering checks	<p>To comply with our legal obligations</p> <p>To perform a contract with you or to take steps at your request with a view to entering into that contract</p>	<p>You</p> <p>Introducers</p>
Funds you have available for investment and the size of investment you are looking to make	<p>To match you with businesses in which you 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 our funds</p> <p>To perform a contract with you or to take steps at your request with a view to entering into that contract</p>	<p>You</p> <p>Introducers</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 our funders 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>	
Types of businesses in which you are interested in investing	To match you with businesses in which you may be interested in investing	<p>Our legitimate interests in managing our funds</p> <p>To perform a contract with you or to take steps at your request with a view to entering into that contract</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 our funders 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>
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 our funds</p>	<p>You</p> <p>Introducers</p>

		<p>To perform a contract with you or to take steps at your request with a view to entering into that contract</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 our funders 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>	
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 our funds</p> <p>To perform a contract with you or to take steps at your request with a view to entering into that contract</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 our funders 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	Our legitimate interests in managing our funds	You

	may be interested in investing	<p>To perform a contract with you or to take steps at your request with a view to entering into that contract</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 our funders 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>	Introducers
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	<p>To comply with our legal obligations</p> <p>To perform a contract with you or to take steps at your request with a view to entering into that contract</p>	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 our funds</p> <p>To perform a contract with you or to take steps at your request with a view to entering into that contract</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>Social media</p> <p>Introducers</p>

		<p>The legitimate interests of our funders 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>	
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 our funds</p> <p>To perform a contract with you or to take steps at your request with a view to entering into that contract</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 our funders 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 our funds</p> <p>To perform a contract with you or to take steps at your request with a view to entering into that contract</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>You</p> <p>Other members of the FSE Group</p> <p>Other investors (if any)</p> <p>The target business</p>

		<p>The legitimate interests of our funders in the deals being concluded 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>	
Investments and loans you have made	To help assess what investments you may be interested in and to invoice you	<p>Our legitimate interests in managing our funds</p> <p>To perform a contract with you or to take steps at your request with a view to entering into that contract</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 our funders in the deals being concluded 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>Other members of the FSE Group</p> <p>Other investors (if any)</p> <p>The target business</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

<p>Records of consents and withdrawals of consents</p> <p>Records of suppression of personal data</p>	<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>	<p>To comply with our legal obligations</p>	<p>You</p>
<p>Records of other communications with you</p>	<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>To perform our contract with you or to take steps with a view to entering 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>
<p>Further information necessary to verify your identity</p>	<p>To check your identity should you choose to exercise your rights as a data subject</p>	<p>To comply with our legal obligations</p>	<p>You</p>
<p>Your relationship (e.g. employee, director, shareholder or guarantor) with any organisation on our database</p>	<p>To check your identity and ensure no conflicts of interest</p>	<p>Our legitimate interests in running our business</p>	<p>You</p> <p>Your organisation</p> <p>Our records</p> <p>Another member of the FSE Group</p>

**CONTACTS, OFFICERS OR EMPLOYEES OF ANY ORGANISATION INTERESTED IN PROVIDING FUNDING OR INVESTING IN ONE OF OUR FUNDS OR OF ANY OF OUR FUNDING PROVIDERS OR INVESTORS**

<p>Your name, address, email address, phone number(s) and other details you or your company or organisation provide to us, or when you or your organisation update your details</p>	<p>To communicate with potential or actual funders and investors, including informing them about potential investments and reporting on the performance of any fund in which they have invested</p> <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>Our legitimate interests in managing our funds</p> <p>The legitimate interests of your company or organisation in identifying opportunities</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 finding matched funding and 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>You</p>
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	<p>Please see the Marketing section below</p> <p>To invite you to meetings of the FSE Investor Network</p> <p>(Please see our <a href="#">Investor Network Privacy Notice</a>)</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>To comply with our legal obligations</p>	
<p>Records of consents and withdrawals of consents</p> <p>Records of suppression of personal data</p>	<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
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
Your relationship (e.g. employee, director, shareholder or guarantor) with any organisation on our database	To verify your identity and to ensure no conflicts of interest arise	Our legitimate interests in running our business	<p>You</p> <p>Your organisation</p> <p>Our records</p>

			Another member of the FSE Group
<b>CONTACTS, OFFICERS AND EMPLOYEES OF A BUSINESS LOOKING FOR OR WHICH HAS RECEIVED INVESTMENT, A LOAN OR OTHER SUPPORT</b>			
Your name, address, email address, phone number(s) and other details you or your organisation provide to us, or when you or your organisation update your details	<p>To communicate with businesses looking for investment, a loan or other support, including informing them about potential investments, loans and other support</p> <p>To communicate with businesses which have received investment, a loan or other support</p> <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>Our legitimate interests in managing our funds</p> <p>The legitimate interests of your company or organisation in receiving investment, a loan or other support</p> <p>The legitimate interests of investors in identifying opportunities</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>You</p> <p>Other members of the FSE Group</p> <p>Introducers</p>

	<p>Please see the Marketing section below</p> <p>To invite you to meetings of the FSE Investor Network</p> <p>(Please see our <a href="#">Investor Network Privacy Notice</a>)</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>To comply with our legal obligations</p>	
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 our funds</p> <p>The legitimate interests of your business in being introduced to potential investors</p> <p>The legitimate interests of investors in identifying opportunities</p> <p>The legitimate interests of funders in funding being provided to help small businesses and the economy grow</p>	<p>Your company or other organisation</p> <p>Other members of the FSE Group</p>
Personal data you include in any presentation or handouts or other information you provide	To provide information to potential investors	Our legitimate interests in managing our funds	<p>You</p> <p>Your company or other organisation</p>

		<p>The legitimate interests of your business in being introduced to potential investors</p> <p>The legitimate interests of investors in identifying opportunities</p> <p>The legitimate interests of funders in funding being provided to help small businesses and the economy grow</p>	
<p>Feedback from you on our services and those of other members of the FSE Group</p>	<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 managing 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
<p>Records of consents and withdrawals of consents</p> <p>Records of suppression of personal data</p>	<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	To engage with you and to make arrangements with you	Our legitimate interests in managing our funds	You

	To deal with any request from you to exercise your rights as a data subject and to check your identity	To comply with our legal obligations	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
Your relationship (e.g. employee, director, shareholder or guarantor) with any organisation on our database	To verify your identity and to ensure no conflicts of interest arise	Our legitimate interests in running our business	You  Your organisation  Our records  Another member of the FSE Group
<b>GUARANTORS</b>			
Your name, address, email address, phone number(s) and other details you or your company or organisation provide to us, or when you or your organisation update your details	To communicate with you about your guarantee	Our legitimate interests in managing our funds  To perform a contract with you or to take steps at your request with a view to entering into that contract  The legitimate interests of the business looking for investment, a loan or other support in receiving it	You

		<p>The legitimate interests of our funders and investors in their investments being secured</p> <p>The interests of the public in small businesses being provided with resources to help them and the economy grow</p>	
<p>Information about your financial standing, assets and the security you can or have provided?</p>	<p>To assess whether to invest or lend on the strength of your guarantee</p>	<p>Our legitimate interests in managing our funds</p> <p>To perform a contract with you or to take steps at your request with a view to entering into that contract</p> <p>The legitimate interests of the business looking for investment, a loan or other support in receiving it</p> <p>The legitimate interests of our funders and investors in their investments being secured</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>Information about other guarantees and security you have given and other liabilities you may have</p>	<p>To assess whether to invest or lend on the strength of your guarantee</p>	<p>Our legitimate interests in managing our funds</p> <p>To perform a contract with you or to take steps at your request with a view to entering into that contract</p>	<p>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>The legitimate interests of the business looking for investment, a loan or other support in receiving it</p> <p>The legitimate interests of our funders and investors in their investments being secured</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>Records of consents and withdrawals of consents</p> <p>Records of suppression of personal data</p>	<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</p>	<p>To comply with our legal obligations</p>	<p>You</p>

	your rights as a data subject		
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 our funds  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
Your relationship (e.g. employee, director, shareholder or guarantor) with any organisation on our database	To check your identity and to ensure no conflicts of interest arise	Our legitimate interests in running our business	You  Your organisation  Our records  Another member of the FSE Group
<b>INDIVIDUALS WHO INTRODUCE POTENTIAL INVESTORS AND/OR TARGET BUSINESSES</b>			
Your name and contact details, and where you work	To communicate with you about potential investments	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 investors in identifying opportunities	Your company or business  Other introducers and mutual contacts

	<p>To send you our newsletter or information about our activities (if you have asked us to do that) - please see the section on marketing</p> <p>Please see the Marketing section below</p> <p>To invite you to meetings of the FSE Investor Network</p> <p>(Please see our <a href="#">Investor Network Privacy Notice</a>)</p> <p>To deal with any request from you to exercise your rights as a data subject and to check your identity</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>Our legitimate interests in managing the FSE Investor Network, including holding meetings</p>	
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		To comply with our legal obligations	
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	Our legitimate interests in managing our funds  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
Your relationship (e.g. employee, director, shareholder or guarantor)	To check your identity and to ensure no conflicts of interest arise	Our legitimate interests in running our business	You

with any organisation on our database			Your organisation  Our records  Another member of the FSE Group
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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 this kind of data about visitors to this website.

**Convictions and Offences:** We do **not** collect or use this kind of data about visitors to this website.

**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 phone you to market our services unless:

- you have objected to receiving marketing calls from us and you have not asked us to call you; or
- your number appears on the Telephone Preference Service or the Corporate Telephone Preference Service and you have not asked us to call you.

You can ask us to stop calling you that at any time.

We do not send unsolicited marketing emails or texts without your consent except:

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

We do not share personal data with anyone outside the FSE Group for marketing purposes except the joint host of an event we host. Please see our [Events Privacy Notice](#).

### **AUTOMATED DECISION MAKING AND PROFILING**

We do not use information about you for the purposes of automated decision making, including profiling.

### **SHARING PERSONAL DATA**

We may share your personal data with:

- If you are a key member of staff, a director, shareholder or guarantor of a business looking for investment, a loan or other support, with our funders and investors
- 
- Other members of the FSE Group.
- Our consultants, contractors and other suppliers who have a need to know in order to perform their obligations to us.
- Someone who wants to acquire or acquires us or our business.

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

- 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 or members of our investment committees.

That person will be obliged to:

- use 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 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 may access personal data when they are outside the European Economic Area, but the same safeguards will apply as if our staff were accessing personal data from within the European Economic Area.

We will not 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 in 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 or a feature of our website, we may not be able to provide that service or feature.

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.

### **OTHER WEBSITES**

Our website may include links to third party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow someone else to collect or share data about you.

We do not control other people's websites and we are not responsible for their privacy policies or their or privacy notices or statements.

This privacy notice does not apply to any website operated by anyone else. If you visit a website operated by someone else, please read its privacy notice (or privacy policy or statement) to find out how it uses your personal data.

### **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](http://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**

We have appointed a Data Protection Manager.

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

- email FSE's Data Protection Manager at [privacy@thefseggroup.com](mailto:privacy@thefseggroup.com); or
- write to us at FSE C.I.C., Riverside House, 4 Meadows Business Park, Station Approach, Blackwater, Camberley GU17 9AB, marking your letter for the attention of The Data Protection Manager.

### **CHANGES TO THIS PRIVACY NOTICE**

This privacy notice was last updated on 1<sup>st</sup> 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.

**Version 3.0 February 2021**