

**THE FSE GROUP
MAILING LIST AND TELEPHONE MARKETING PRIVACY NOTICE**

CONTENTS

About us and what we do
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 AND WHAT WE DO

Who we are

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.

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

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

What we do

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.

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 have asked us to provide them with our newsletter or information about our activities, including our events;
- to whom we send our newsletter or information about our activities, including our events; or
- who we contact by phone to give them information about our activities, including our events.

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 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 provided your personal data to us; or
- we have obtained your personal data from a third party such as Companies House or a supplier of company data. In that case we keep only your personal data which we need to communicate with you to provide you with our newsletter or information about our activities or investment opportunities by email, or to send you our newsletter or information about our activities by post, or to phone you to tell you about our activities or investment opportunities. You may opt out at any time.

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.

PERSONAL DATA	PURPOSES	THE LAWFUL BASIS	SOURCE
<p>Your name, position, email address and phone number, your organisation and your organisation's postal address</p>	<p>To contact you to ask if you wish to receive our newsletter or information about our events, investment opportunities or other activities</p> <p>To invite you to events</p> <p>To send you the FSE Group's newsletter, or information about investment opportunities, events and other activities of the FSE Group</p> <p>To phone you about investment opportunities, events and other activities of the FSE Group</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 marketing and publicising our business</p> <p>The legitimate interests of businesses looking for investment, a loan or other support in our publicising investment opportunities</p> <p>The legitimate interests of anyone looking for an investment opportunity in finding out how we may be able to help them</p> <p>The interests of our funders in their funding being used 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> <p>Providers of company data</p>
<p>Records of consents, requests to subscribe, requests to send you our newsletter or other information about our activities</p> <p>Records of withdrawals of consent, requests to unsubscribe, requests not to send you our newsletter or other information about our activities</p> <p>Records of requests for us not to phone you.</p> <p>Records of opt-outs of direct marketing by mail</p>	<p>To ensure that we have your consent where necessary</p> <p>To ensure that we act on your request to unsubscribe, opt-out of direct mail etc.</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 comply with our legal obligations</p>	<p>You</p>

Records of suppression of personal data			
Records of other communications with you about our calls, texts or mailshots (by email or post)			
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 should you choose to exercise your rights as a data subject	The legitimate interests of businesses looking for investment, a loan or other support in our publicising investment opportunities	You Our records Another member of the FSE Group

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 are on our mailing list.

Convictions and Offences: We do **not** collect or use this kind of data about individuals who are on our mailing lists.

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 do not send unsolicited marketing emails 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 may phone you to let you have information about investment opportunities, events and other activities of the FSE Group unless:

- a) you have objected to receiving marketing calls from us and you have not asked us to call you; or
- b) 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 will 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 individuals who are on our mailing lists event in order to make automated decisions, including profiling.

SHARING PERSONAL DATA

We may share your personal data with:

- 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 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 a sender of mail shots or the host of our IT systems.

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 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 paragraph below.

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

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 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 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.