

Business Launchpad Privacy Policy

Introduction

Business Launchpad (“we”) promises to respect any data you share with us, or that we collect from other organisations. We promise to keep your information safe by constantly monitoring how we collect, store and transfer your data. We aim to always protect your personal data.

Developing a better understanding of our clients through their personal data allows us make better decisions, fundraise more efficiently and, ultimately, helps us to reach our four goals:

1. Developing young people as entrepreneurs – maximising economic impact
2. Developing young people as leaders
3. Developing understanding of Trident Business Centre as a community asset
4. Becoming a thought leader: entrepreneurship and leadership

From May 2018, in line with the [GDPR](#), we will be moving to be an ‘opt-in only’ communication policy. This means that we will only send marketing communications to those that have explicitly stated that they are happy for us to do so via their preferred channel(s) (email, SMS, phone or post).

If you would like to ‘opt-in’ to receive further marketing communications from us and information on upcoming events / workshops, please email us data@businesslaunchpad.org.uk

Identity and contact details of the controller and where applicable, the controller’s representative) and the data protection officer

Controller – Business Launchpad

Controller’s representative: Felicia Mattis-Rome –Chief Executive Officer–
felicia@businesslaunchpad.org.uk

Data Protection Officer – Robert Fricker – Finance Manager –
robert@businesslaunchpad.org.uk

Purpose of the processing and the legal basis for the processing

We will use the personal data collected from you for the following purposes:

- Marketing,
- promoting the services we offer,
- case studies or
- Statistical purposes and to inform our supporters and young people of the support that we provide.

We will seek to obtain consent from everyone whose data we collect. This serves as our legal basis for processing.

By 'opting in' you confirm that you are consenting to Business Launchpad's use of your personal data for the aforementioned purposes(s) and are granting Business Launchpad permission to carry out those actions and/activities.

The legitimate interests of the controller or third party, where applicable

Some examples of Business Launchpad's legitimate interests include:

- Fundraising purposes – identities will remain anonymous
- Contractual reporting requirements
- Assessing eligibility

Categories of personal data

The EU's General Data Protection Regulation ("GDPR") defines "personal data" as:

"any information relating to an identified or identifiable natural person ('data subject'); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person".

The GDPR classifies certain data as belonging to "special categories", as follows:

- Racial origin;
- Ethnic origin;
- Political opinions;
- Religious beliefs;
- Membership to a trade-union;
- Genetic data;
- Biometric data;
- Health data;
- Data concerning a natural person's sex life;
- Sexual orientation; and
- Other.

Some examples of data we collect at Business Launchpad include:

- Personal data
- Criminal record information
- Benefits
- Disability
- Education
- Racial and Ethnic Origin
- Turnover

Any recipient or categories of recipients of the personal data

Business Launchpad is responsible for ensuring the security of its data processing facilities and other information assets in relation to third parties. This procedure applies to all situations where third parties require access to any of Business Launchpad's data, including all of the following categories of external parties with whom Business Launchpad may have agreements in place:

- Service providers, including managed security service providers;
- Clients and customers;
- Outsourcing suppliers including: facilities, operations, IT systems, data collection and call centres;
- Consultants;
- Auditors;
- Providers of IT systems and services;
- Providers of cleaning, catering and other outsourced support services; and
- Temporary staff, including placement and other short-term appointments.

Business Launchpad is responsible for assessing associated third-party risks according to the category and level of risk involved

Details of transfers to third country and safeguards

Business Launchpad is committed to ensuring that all personal information collected and processed is appropriate for the stated purpose(s) and shall not constitute an invasion of your privacy. We may share your personal data with third party service providers who are contracted by us and we shall ensure that they will hold your personal data securely and shall use it only in order to fulfil the service for which they are contracted. When there is no longer a service need, or the contract comes to an end, the third party will dispose of all personal data according to our procedures. We will never share your personal data with third parties until we have received your consent, unless we are required do so by law.

Retention period or criteria used to determine the retention period

Business Launchpad will process your data (i.e. collect, store and use) according to the requirements of the GDPR at all times and shall endeavour to keep your personal data up-to-date, ensuring its accuracy and will not keep it for longer than it is required. In some situations, there are set legal requirements for the length of time that Business Launchpad will retain your personal data (6 years) but usually Business Launchpad will use its discretion, ensuring that personal data is not kept outside of our usual business requirements.

Please see below regarding withdrawal rights.

The existence of each of data subject's rights

As data subjects you have

- The right to access personal information;
- The right to withdraw consent;
- The right to amend personal data;

- The right to request that personal data be permanently deleted;
- The right to strict processing; and
- The right to raise an official complaint with the relevant authority;

The right to withdraw consent at any time, where relevant

You may withdraw your consent at any time by reading our Right to Withdraw Consent Procedure 92017-I and completing the Data Subject Withdrawal of Consent Form 92017-J. Please email us at data@businesslaunchpad.org.uk if you wish to be sent a copy of this form.

The right to lodge a complaint with a supervisory authority

You may lodge a complaint with the supervisory authority, the Information Commissioner's Office at any time

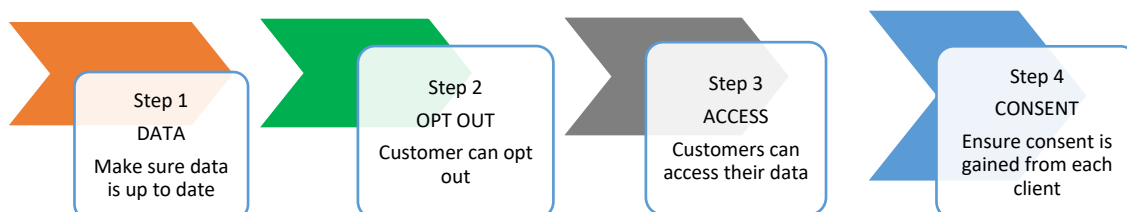
The source the personal data originates from and whether it came from publicly accessible sources

We may obtain information about our data subjects from publicly accessible or third party sources such as:

- Referral parties
- Social media
- Companies House

The existence of automated decision making, including profiling and information about how decisions are made, the significance and the consequences.

We analyse data provided in order to develop an understanding of the needs of our clients so that we can design our services to meet them.



Policy Name	Version	Doc ref
Anti-Bullying	2	

Policy Owner	Felicia Mattis-Rome
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Approval status

Date adopted by Trustees	02/11/2021		
Date published	24/03/2022	Date for next review	24/03/2023

Document Control

Reviewers

Name	Position
Felicia Mattis-Rome	CEO
Hareg Tamiru	HR/Business Administrator