

Privacy Notice



INTRODUCTION

Welcome to the Big Innovation Centre Limited's privacy notice. We respect your privacy and are committed to protecting your personal data.

1 Important information and who we are

1.1 Purpose of this privacy notice

This privacy notice aims to give you information on how Big Innovation Centre Limited collects and processes your personal data, including any data you may provide through our website when you request services from us.

It is important that you read this privacy notice together with any other privacy notice we may provide on specific occasions when we are processing personal data about you so that you are fully aware of how and why we are using your data. This privacy notice supplements the other notices and is not intended to override them.

This privacy notice was prepared in accordance with the requirements of the EU General Data Protection Regulation.

1.2 Controller

Big Innovation Centre Limited is the controller of your personal data ("we", "us" or "our" in this privacy notice).

We have appointed a data privacy manager who is responsible for overseeing questions in relation to this privacy notice. If you have any questions about this privacy notice, including any requests to exercise your legal rights, please contact the data privacy manager using the details set out below.

1.3 Contact details

Our full details are:

Full name of legal entity:	Big Innovation Centre Limited
Email address:	accounts@biginnovationcentre.com
Postal address:	20 Victoria Street, London SW1H 0NF
Telephone number:	02037134036

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues (www.ico.org.uk). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

1.4 Changes to the privacy notice and your duty to inform us of changes

This version was last updated in July 2018.

It is important that the personal data we hold about you is accurate. Please keep us informed if your personal data changes during your relationship with us.

2 The data we collect about you

2.1 Personal data means any information about an individual from which that person can be identified. It does not include anonymous data.

2.2 We may collect, use, store and transfer different kinds of personal data about you as follows:

2.2.1 **Identity Data** includes first name, last name and title.

2.2.2 **Contact Data** includes email address and telephone number.

2.2.3 **Financial Data** includes bank account and payment card details.

2.2.4 **Transaction Data** includes details about payments to and from you and other details of services you have purchased from us.

2.2.5 **Technical Data** includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access our website.

2.2.6 **Profile Data** includes your username and password, your feedback and survey responses.

2.2.7 **Usage Data** includes information about how you use our website and services.

2.2.8 **Marketing and Communications Data** includes your preferences in receiving marketing from us.

We also 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 considered personal data in law as this data does not directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy notice.

2.3 If you fail to provide personal data

Where we need to collect personal data by law, or under the terms of a contract we have with you and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you.

3 How is your personal data collected?

We use different methods to collect data from and about you including through:

3.1 **Direct interactions** -You may give us your Identity and Contact Data by corresponding with us. This includes personal data you provide when you:

- 3.1.1 request our services;
- 3.1.2 create an account on our website;
- 3.1.3 download publications;
- 3.1.4 subscribe to member groups;
- 3.1.5 request marketing to be sent to you;
- 3.1.6 enter a competition, promotion or survey; or
- 3.1.7 give us some feedback.

4 How we use your personal data

4.1 We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- 4.1.1 Where we need to perform the contract we are about to enter into or have entered into with you.
- 4.1.2 Where it is necessary for our legitimate interests and your interests and fundamental rights do not override those interests.
- 4.1.3 Where we need to comply with a legal or regulatory obligation.
- 4.1.4 Where you have consented to receiving marketing communications from us.

4.2 Purposes for which we will use your personal data

We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
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To set you up as a new client	(a) Identity (b) Contact	Performance of a contract with you
To process any payments from you	(a) Identity (b) Contact (c) Financial (d) Transaction	(a) Necessary for our legitimate interests (to recover debts due to us)
To manage our relationship with you which will include: (a) Notifying you about changes to our terms or privacy policy (b) Asking you to leave a review or take a survey	(a) Identity (b) Contact (c) Profile (d) Marketing and Communications	(a) Performance of a contract with you (b) Necessary to comply with a legal obligation (c) Necessary for our legitimate interests (to keep our records updated and to study how customers use our products/services)
To administer and protect our business and website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	(a) Identity (b) Contact (c) Technical	(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise) (b) Necessary to comply with a legal obligation
To use data analytics to improve our website, products/services, marketing, customer relationships and experiences	(a) Technical (b) Usage	Necessary for our legitimate interests (to define types of customers for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)

To make suggestions and recommendations to you about goods or services that may be of interest to you	(a) Identity (b) Contact (c) Technical (d) Usage (e) Profile	Necessary for our legitimate interests (to develop our products/services and grow our business)
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4.3 Promotional offers from us

We may use your Identity, Contact, Technical, Usage and Profile Data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which products, services and offers may be relevant for you (we call this marketing).

You will receive marketing communications from us if you have requested information from us or if you provided us with your details when you entered a competition or registered for a promotion and, in each case, you have not opted out of receiving that marketing.

4.4 Opting out

You can ask us to stop sending you marketing messages at any time by contacting us.

4.5 Change of purpose

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

5 Disclosures of your personal data

- 5.1 We will only disclose your personal data to a third party where it is necessary to do so, for example, if you request to attend an event or conference and we need to inform the organiser that you will be attending it.

6 International transfers

- 6.1 We only transfer your personal data outside the EEA where the transfer is necessary for the performance of a contract between you and us (for example, if you request to attend a meeting overseas, we will need to share your details with the meeting organiser).

7 Data security

- 7.1 We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.
- 7.2 We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

8 Data retention

- 8.1 How long will you use my personal data for?

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements. If you have any questions about how long we keep your personal data, please contact us.

9 Your legal rights

- 9.1 Under certain circumstances, you have rights under data protection laws in relation to your personal data. You have a right to:
- 9.1.1 **Request access** to your personal data (commonly known as a '**data subject access request**'). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
- 9.1.2 **Request correction** of the personal data that we hold about you.
- 9.1.3 **Request erasure** of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.
- 9.1.4 **Object to processing** of your personal data where we are relying on a legitimate interest and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your

personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

9.1.5 **Request restriction of processing** of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

9.1.6 **Request the transfer of** your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

9.1.7 **Withdraw consent** at any time where we are relying on consent to process your personal data.

9.2 No fee usually required

You will not have to pay a fee to exercise your other rights. However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

9.3 What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to exercise your rights. This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

9.4 Time limit to respond

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.