

WEBSITE DATA PROTECTION NOTICE

1 Who we are

We are Social Investment Scotland (**SIS**), a Scottish company limited by guarantee with registered number SC223302 and having its registered office address at 6 Broughton Street Lane, Edinburgh, Scotland, EH1 3LY. We are also a registered Scottish charity with charity number SC036875.

This data protection notice also applies to our affiliated entities and group companies, namely SIS (Community Finance) Limited, SIS Community Capital Limited, Social Growth Fund LLP, Community Investment Enterprise Facility Limited and SIS Ventures Limited (our “**group companies**”) and so, in this notice, references to “we” or “us” mean SIS and our group companies.

We are data controllers for the purposes of the General Data Protection Regulation (Regulation (EU) 2016/679) and related data protection legislation.

SIS's registration number at the Information Commissioner's Office is Z7733464, and our group companies' registration numbers are Z7733390, ZA113004, ZA075976, ZA315551, ZA315551 respectively.

2 How to contact us

If you have any questions about this Data Protection Notice or our data protection policies generally, please contact us:

By post: Data Protection Officer, Social Investment Scotland, Playfair House, 6 Broughton Street Lane, Edinburgh, Scotland, EH1 3LY

By email: hello@socialinvestmentscotland.com

By phone: 0131 558 7706

Online: <http://www.socialinvestmentscotland.com/get-in-touch>

3 Purpose of the Data Protection Notice

We are committed to protecting your personal data and your privacy. This Data Protection Notice sets out the basis on which any personal data that you provide to us or that we obtain from a third party will be processed by us. Please read the following carefully to understand our practices regarding your personal data and how we will treat it.

Before we process your personal data, we are obliged to inform you of who we are, why we need to process your personal data, what we will do with your personal data and with whom we may share your personal data.

It is important that you read this Data Protection Notice together with any other privacy notice or fair processing notice we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. Any other privacy notice or fair processing notice will supplement (not override) this Data Protection Notice.

This Data Protection Notice was last updated on 21 May 2018.

4 **To whom does this Data Protection Notice apply?**

This Data Protection Notice applies to any visitors to or users of our website (www.socialinvestmentscotland.com, www.sisventures.com or any other domain name registered in our name) as well as to any individual who contacts us by telephone, e-mail, post, text, social media or any other means.

5 **Information about our website**

Our website is not intended for children and we do not knowingly collect data relating to children.

This website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy notice of every website you visit.

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly. For more information about the cookies we use, please see our Cookie Notice (http://www.socialinvestmentscotland.com/cookie_notice_SIS.pdf).

6 **What personal data do we collect and process?**

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (**anonymous data**).

We **may** collect, use, store and transfer different kinds of personal data about you which we have grouped together follows:

- **Identity Data** includes first name, last name, social media username or similar online identifier, marital status, title, date of birth and gender.
- **Contact Data** includes home or business address, billing address, email address (personal or business) and telephone numbers.
- **Financial Data** includes bank account and payment card details.
- **Transaction Data** includes details about payments to and from you and other details of, for example, our events that you have attended.
- **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 this website.
- **Profile Data** includes your username and password, purchases or orders made by you, your interests, preferences, feedback and survey responses.
- **Usage Data** includes information about how you use our website, products and services.
- **Marketing and Communications Data** includes your preferences in receiving marketing from us and your communication preferences.

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 Data Protection Notice.

We do not collect any "**special categories of personal data**" about you via our website (this includes details about your 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). Nor do we collect any information via our website about criminal convictions and offences.

7 **How is your personal data obtained?**

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

- **Direct interactions.** You may give us your Identity, Contact and Financial Data by filling in forms or by corresponding with us by post, phone, email, social media or otherwise. This includes personal data you provide when you:
 - make an enquiry online or by telephone
 - register for one of our events online or by telephone;
 - request marketing to be sent to you or sign up for our newsletter;
 - fill out a contact form on our website; or
 - give us some feedback.
- **Automated technologies or interactions.** As you interact with our website, we may automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, server logs and other similar technologies. We may also receive Technical Data about you if you visit other websites employing our cookies. Please see our Cookie Notice for further details (http://www.socialinvestmentscotland.com/cookie_notice_SIS.pdf).
- **Third parties or publicly available sources.** We may receive or obtain personal data about you from various third parties as set out:
 - Technical Data from analytics providers or search information providers (such as Google Analytics).
 - Contact, Financial and Transaction Data from providers of technical, payment and event organisation services (such as Eventbrite).
 - Identity and Contact Data from social media providers (such as Twitter or LinkedIn).
 - Identity and Contact Data from publicly available sources such as Companies House and the Electoral Register.

8 **Failure 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 (for example, to register you for one of

our events). In this case, we may have to cancel a product or service you have with us but we will notify you if this is the case at the time.

9 How will we use your personal data?

Personal data will be processed by us where you consent to the processing or where that processing is necessary for 1) the performance of a contract with you; or 2) compliance with a legal obligation to which we are subject; or 3) the purposes of our legitimate interests (or those of a third party).

Generally we do not rely on consent as a legal basis for processing your personal data other than in relation to sending direct marketing communications to you. Please see below for further details around our marketing practices.

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. We have also identified what our legitimate interests are where appropriate.

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
To register you for one of our events including: (a) Manage payments, fees and charges (b) Collect and recover money owed to us (c) Deal with any customer feedback	(a) Identity (b) Contact (c) Financial (d) Transaction	(a) Performance of a contract with you (where applicable) (b) Necessary for our legitimate interests (to perform a contract with your organisation (where applicable) and to recover debts due to us and to manage business relationships)
To manage our relationship with you including responding to enquiries and gaining and analysing feedback	(a) Identity (b) Contact (c) Financial (d) Profile (e) Marketing and Communications	Necessary for our legitimate interests (to run our business efficiently, to enhance, modify and improve our services and to pursue our commercial objectives)
To administer and protect our business and this 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 maintain the security of the data that we hold)
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)

When we process your personal information for our legitimate interest (as indicated above), we acknowledge that our legitimate interests do not automatically override your interests and we make sure to consider and balance any potential impact on you (both positive and negative) and your rights under data protection laws.

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 at hello@socialinvestment.com or phone us at 0131 558 7706.

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.

10 Marketing

Our direct marketing communications generally consist of delivering a regular newsletter and informing you of upcoming events hosted or organised by us, all by e-mail or other electronic means.

Where you provide us with a personal e-mail address or other personal contact details, we will only provide you with direct marketing communications by e-mail or other electronic means where you have consented to receive such communications. You can subscribe for such marketing communications at any time by completing the sign-up form via <http://www.socialinvestmentscotland.com/get-in-touch> or by contacting us at hello@socialinvestment.com or phoning 0131 558 7706.

Where you provide us with a business e-mail address or other business contact details, we may provide you with direct marketing communications where we feel that this may be relevant to you (provided that you have not opted out of such communications). When we use your personal data for such purposes, we do so on the basis that it is in our legitimate interests to pursue direct marketing, provided that it constitutes fair processing of your personal data to do so.

You can opt-out of or unsubscribe from any such marketing communications at any time by contacting us via <http://www.socialinvestmentscotland.com/get-in-touch> or by clicking “unsubscribe” on the bottom of any marketing e-mail or by contacting us at hello@socialinvestment.com or phoning 0131 558 7706.

Where you opt out of receiving these marketing communications, this opt-out will not apply to personal data provided to us for any other purpose, whether under this Data Protection Notice or any other privacy notice issued by us.

11 **With whom do we share your personal data?**

We may have to share your personal data with the parties set out below for the purposes set out in the table above.

- payment and credit card providers.
- service providers acting as processors who provide IT and system administration services.
- service providers acting as processors who provide event management services (such as Eventbrite).
- service providers acting as processors who provide marketing and communications services (such as Mailchimp).
- service providers acting as processors who provide survey services (such as Survey Monkey and SNAP).
- professional advisers including lawyers, bankers, auditors and insurers who provide consultancy, banking, legal, insurance and accounting services.
- any relevant regulatory authority, including HM Revenue & Customs, the Office of Scottish Charities Regulator, Companies House, Financial Conduct Authority and any courts or tribunals who require reporting of processing activities in certain circumstances.
- any relevant research organisations including those undertaking social impact surveys on our behalf.
- third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this Data Protection Notice.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

12 **International transfers**

Some of our external third parties (such as Eventbrite) are headquartered or based outside the European Economic Area (**EEA**) so their processing of your personal data may involve a transfer of data outside the EEA.

Whenever we transfer your personal data out of the EEA, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data by the European Commission. For further details, see [European Commission: Adequacy of the protection of personal data in non-EU countries](#).

- Where we use certain service providers, we may use specific contracts approved by the European Commission which give personal data the same protection it has in Europe. For further details, see [European Commission: Model contracts for the transfer of personal data to third countries](#).
- Where we use providers based in the USA (such as Eventbrite), we may transfer data to them if they are part of the Privacy Shield which requires them to provide similar protection to personal data shared between the European Union and the USA. For further details, see [European Commission: EU-US Privacy Shield](#).

Please contact us if you want further information on the specific mechanism used by us when transferring your personal data out of the EEA.

13 **Automated decision making and profiling**

We do not use automated decision-making (including profiling) to make any decisions relating to matters set out in this Data Protection Notice which would produce a legal effect or similarly significantly affect a data subject.

14 **Accuracy of your data**

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

15 **How long do we retain your personal data?**

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.

Generally speaking, we will usually retain your personal data for six (6) years following expiry of any contracts or arrangements between us, unless we are obliged to retain your personal data for a longer period as a result of an overriding legal obligation or in order to establish, defend or exercise legal rights.

For more details about our retention periods, please contact us at hello@socialinvestment.com or calling 0131 558 7706.

16 **Data security**

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.

We have put in place procedures to deal with any suspected personal data breach and will notify you and the Information Commissioner's Office of a breach where we are legally required to do so.

17 **Your rights**

17.1 Your personal data is protected by legal rights, which include your rights to:

- **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.
- **Request correction of the personal data that we hold about you.** This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.
- **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. 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, following your request.
- **Object to processing of your personal data** where we are relying on a legitimate interest (or those of a third party) 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.
- **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: if you want us to establish the data's accuracy; where our use of the data is unlawful but you do not want us to erase it; 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 you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.
- **Request the transfer of your personal data to you or to a third party (data portability).** 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.
- **Withdraw consent at any time where we are relying on consent to process your personal data.** However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

17.2 If you wish to exercise any of these rights, please contact us at hello@socialinvestment.com or 0131 558 7706.

17.3 We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other 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.

17.4 You will not have to pay a fee to access your personal data (or to exercise any of the 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.

- 17.5 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.
- 17.6 You also have the right to complain to the Information Commissioner's Office, which regulates the processing of personal data, about how we are processing your personal data.