PRIVACY NOTICE

GPC Skills Ltd., a company registered in England and Wales, company number: 10799294, registered office: The Catalyst, Baird Lane, York, England, YO10 5GA ("**we**", "**us**" "**our**") provides business expansion services in the Cambridge and Peterborough region

As part of our activities we may collect personal data about you (referred to as "**you**" or "**your**" in this privacy notice). We respect your privacy and are committed to protecting your personal data. If you have any questions regarding the processing of your personal data by us or to exercise any of your rights in respect of the processing carried out by any of them please contact our data protection officer at dpo@gateleyplc.com.

Purpose of this privacy notice

This privacy notice aims to give you information on how we collect and process personal data.

It is important that you read this privacy 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. This privacy notice supplements the other notices and is not intended to override them.

The data we collect about you

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

- **Identity data** includes first name, last name, title, contact details, social media contact details, business history age, date of birth, address and gender.
- **Qualifications**
- **Ethnicity and religion** for equality monitoring and reporting.
- **Disabilities** for equality monitoring and reporting.
- **Details of your relationship with the entity proposed for investment as applicable,** which includes details of grant funding sought and provided, equity funding sought and provided, skill development sought and provided and coaching sought and provided
- **Financial data** for analysis of your business
- **Bank account data**
- **Details of your skills and training**
- **If you are a sole trader details of your bank accounts for grant processing**
- **Images of you from our CCTV systems**.

We 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 data to report on the success of an investment or grant. 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.

Depending on the nature of our interactions with you, there may be certain essential personal information that we must collect from you in relation to your relationship with us. This will vary depending on the relationship we have with you.

We may also ask you for additional personal information which it is optional for you to provide but which will allow us to better tailor our relationship with you. For example, you may provide us with additional contact details to make it easier for us to get in touch with you, or with additional information about your dietary preferences in connection with a social engagement.

We will always aim to make it clear which personal information it is necessary for you to provide and which personal information is optional. However, if you are unsure as to whether you are required to provide any particular piece of personal information please ask.

We may sometimes collect additional information from third parties including former employers, credit reference agencies or other background check agencies. We will also collect additional personal information in the course of the period of you working with us.

If you fail to provide personal data

Where you fail to provide any requested data, we may not be able to make service available to you but we will notify you if this is the case at the time.

How is your personal data collected?

We collect personal data primarily from you. We also receive information from publicly accessible sources and from your business and from your interactions with us.

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. 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. For example, where we process personal data specifically concerning your health or disabilities, we will be doing so on the basis of equality monitoring. Please contact the DPO 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.

In some cases we may use your personal information to pursue legitimate interests of our own or those of third parties, provided your interests and fundamental rights do not override those interests. These legitimate interests are to manage our relationship with you, determine our

respective rights and obligations and to properly conduct our business. There are more limited circumstances where we process personal data pursuant to your consent.

Where you have given us your consent to use your personal information in a particular manner, you have the right to withdraw this consent at any time, which you may do by contacting us as described below. Please note however that the withdrawal of your consent will not affect any use of the data made before you withdrew your consent and we may still be entitled to hold and process the relevant personal information to the extent that we are entitled to do so on bases other than your consent. Withdrawing consent may also have the same effects as not providing the information in the first place, for example we may no longer be able to provide certain benefits to you.

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest	Controllers
To enrol you as someone who wants to be involved in our activities	All of the personal data we collect (apart from CCTV data)	Necessary for our legitimate interests For the CPCA/Funders: necessary for the performance of a public task carried out in the public interest or in the exercise of official authority vested in the CPCA	All
To discuss investments grants and training	All of the personal data we collect (apart from CCTV data)	Necessary for our legitimate interests For the CPCA/Funders: necessary for the performance of a public task carried out in the public interest or in the exercise of official authority vested in the CPCA	GEG IIS
Growth coaching	All of the personal data we collect (apart from CCTV data)	Necessary for our legitimate interests For the CPCA/Funders: necessary for the performance of a public task carried out in the public interest or in the exercise of official authority vested in the CPCA	GEG YTKO
Skill development	All of the personal data we collect (apart from CCTV data)	Necessary for our legitimate interests For the CPCA/Funders: necessary for the performance of a public task carried out in the public interest or in the exercise of official authority vested in the CPCA	GEG GPC
Security of our operations	All of the personal data we collect	(a) Necessary to comply with a legal obligation (b) Necessary for our legitimate interests (security) (c) your consent	All

Publicity	Photographs and first names of participants	Necessary for our legitimate interests (promotion of activities) but we only publish this data if we have received a specific photography consent from you.	All
Internal record keeping	All of the personal data we collect	Necessary for our legitimate interests except in relation to equalities data which is processed for a reason of substantial public interest For the CPCA//Funders: necessary for the performance of a public task carried out in the public interest or in the exercise of official authority vested in the CPCA and in some cases for its legitimate interests except in relation to equalities data which is processed for a reason of substantial public interest	All
External Reporting	All of the personal information we collect	Necessary for the legitimate interests of those who support us (to evaluate the impact of our activities and similar events operated by similar organisations) except in relation to equalities data which is processed for a reason of substantial public interest For the CPCA//Funders: necessary for the performance of a public task carried out in the public interest or in the exercise of official authority vested in the CPCA/Funders and in some cases for its legitimate interests except in relation to equalities data which is processed for a reason of substantial public interest	All
To make suggestions and recommendations of Events that may be of interest to you	(a) Identity data (b) Contact data	Necessary for our legitimate interests (to develop our products/services and grow our business)	All

We do not process any of your personal data by automated means where it produces legal effects concerning you or similarly significantly affects you.

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 the DPO.

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.

Disclosures of your personal data

We will disclose your personal data to:

- **The CPCA and sources of public funding**
- **Suppliers and service providers:**
- **Any relevant regulators:** where we are required to do so by law or to assist with their investigations or initiatives, and this includes but is not limited to the Information Commissioner's Office.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law.

International transfers

We may transfer personal information to countries outside of the UK, through the use of our suppliers (such as Microsoft). Some of these countries may be in the EEA, which has the same level of protection under data protection laws as the UK. Other countries may not have the same data protection laws and may not provide the same level of protection.

If we transfer personal information to countries outside of UK or EEA, we may rely on a decision from the European Commission or the UK Secretary of State determining that the country provides an adequate level of protection for data protection. Alternatively, we may rely on appropriate safeguards in respect of transfers of personal information as permitted in accordance with UK data protection laws, for example, by use of adopted standard contractual clauses.

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 any applicable regulator of a breach where we are legally required to do so.

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.

Details of retention periods for different aspects of your personal data are available in our retention policy which you can request from us by contacting the DPO.

In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

Your legal rights

Under certain circumstances, you have rights under data protection laws in relation to your personal data. Please contact our DPO (details above) if you wish to exercise any of these rights.

- Request access to your personal data
- Request rectification of your personal data
- Request erasure of your personal data
- Object to processing of your personal data
- Request restriction of processing your personal data
- Request transfer of your personal data

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.

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.

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.

Complaints

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. If you wish to exercise any of the rights set out above, please contact our DPO on email at dpo@gateleyplc.com or by post at Data Protection Officer, Gateley plc, Ship Canal House, 98 King Street, Manchester, M2 4WU.