



## **Big Issue Invest Privacy Notice**

**TBI Group – Updated May 2022**

**Policy NO: GDPR005**

| Version History |             |                |                             |                        |
|-----------------|-------------|----------------|-----------------------------|------------------------|
| Version         | Approved by | Revision Date  | Description of Change       | Author                 |
| <b>2.0</b>      |             | <b>05/2022</b> | <b>Reviewed and Updated</b> | <b>Stepan Zelinger</b> |
|                 |             |                |                             |                        |
|                 |             |                |                             |                        |

## 1 WHO WE ARE AND THE SCOPE OF THIS PRIVACY NOTICE

This is a privacy policy notice of Big Issue Invest (BII), a private company limited by shares registered in England with company number 04764982 whose registered office is 113-115 Fonthill Road, Finsbury Park, London N4 3HH.

“Big Issue Invest”, “BII”, “we”, “us” and “our” means Big Issue Invest.

Big Issue Invest is part of The Big Issue Group (TBIG). Alongside Big Issue Invest, TBIG consists of the following registered companies: The Big Issue Company (company registration number 02612480) and The Big Issue Foundation, a registered charity, with a charity number 1049077 (company registration number 3049322). Some of the group’s other services and online sites have their own policies that will be relevant to you when you are using those sites and services.

## 2 ABOUT THIS PRIVACY NOTICE

When you interact with us by phone, mail, in person or online, we sometimes receive personal information about you. As a result, we are a data controller in respect of your personal data for the purposes of data protection law. We are therefore responsible for ensuring that we use your personal data in compliance with data protection law.

Personal data is any information about you which you can be identified or identifiable. We only collect your personal data in line with applicable laws. This policy sets out how we collect, use and store your personal data.

## 3 HOW TO CONTACT US

Should you have any questions about how personal data is used by BII, you can email us at [dataprotection@bigissue.com](mailto:dataprotection@bigissue.com)

## 4 HOW WE COLLECT INFORMATION ABOUT YOU

In running and maintaining our website we may collect and process information about your use of our site including details of your visits such as pages viewed, length of visits and the resources that you access. Such information includes traffic data, location data and other communication data.

We do not collect any personal data about you through our website. However, we may collect your personal data whenever you provide us with information, for example when you:

- submit personal information to us using our online forms;
- enquire about our activities;
- make use of our services;
- register with us.

We may also collect your personal data where we receive information about you from third parties. However, third parties will only provide us with this information where you have given them permission to share your information.

We may also collect and use publicly available information about you to carry out background checks where these are required for delivering our services, for example when our services involve the use of public funding.

For information about the use of Cookies on our website, please see:

[https://www.bigissue.com/privacy-policy/#\\_c47a2gkib92r](https://www.bigissue.com/privacy-policy/#_c47a2gkib92r).

## **5 WHAT DATA WE COLLECT**

The personal data that we may collect or process about you is:

Information we collect or generate about you. In running and maintaining our website we may collect and process information about your use of our site including details of your visits such as pages viewed, length of visits and the resources that you access. Such information includes traffic data, location data and other communication data. We will automatically collect technical information including the Internet protocol (IP) address used to connect your computer to the Internet, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform, information about your visit including the full Uniform Resource Locators (URL) clickstream to, through and from our site (including date and time), page response times, download errors.

Information that you provide to us: This includes information about you that you give us by communicating with us, whether face-to-face, by phone, e-mail or otherwise. This information may include, but may not be limited to, your name, address, contact telephone number, email address and role description.

We may also collect your personal data as part of our Know Your Customer and Anti-Money Laundering procedures conducted when you agree to receive an investment, loan or a grant from us. Where you are the legal signatory of your organisation, have the authorisation to make payments from your organisation's bank account, are an individual with significant control, or hold a different key role in your organisation, the personal information we may

collect will typically include: your full name, year of birth, gender, address, email and telephone number, as well as copies of personal documents and proofs of address.

We may also ask for equal opportunities monitoring information about the leadership of your organisation and will collect this data where provided, consistently with the provisions of the Data Protection Act 2018 for collecting personal data for the promotion of equal of opportunity or treatment.

## **6 HOW WE WILL USE YOUR PERSONAL DATA**

Your personal data may be used by us in the following ways and for the following purposes:

- Providing you with services, products or information which you have requested, and conducting due diligence and identity checks as appropriate to the type of service or product;
- Managing our relationship with you (e.g. ensuring we know how you prefer to be contacted)
- Reporting to the appropriate legal and regulatory authorities, and complying with the law;
- Assessing risks to public funding where relevant, and fulfilling reporting requirements where provision of statistical information has been agreed with external funders;
- Understanding how we can improve our services, products or information delivery;
- Conducting evaluation of our funds, programmes or conducting sectoral research;
- Providing you with details of other services offered by Big Issue Invest, including through marketing communications.
- Profiling - to enable us to communicate with you effectively, we may sometimes use your data for analysis purposes, based on information that you have provided to us; such as location, marketing sources, behaviour and interests. We use anonymised data in all our profiling activities.

You have the right to object to our lawful processing of your information at any time, and can do so by contacting us in accordance with Section 3 above (“How to contact us”).

## **7 SHARING YOUR PERSONAL DATA**

In general, once received by Big Issue Invest your data is processed by us, and we do not pass personal data provided by you to third parties. Where we do share your personal data, we do so with the following recipients and categories of recipients:

### ***Implementing partners***

Some of our services and programmes are delivered in partnership with other organisations who act as joint data controllers for information you give us or that we collect about you. Where sharing your personal data with them, we will always have an appropriate data

sharing agreement in place to ensure your data is processed in line with this policy and Data Protection legislation. Where they would be using your personal data for purposes different to those stated in this policy, they will inform you or seek consent from you as required by Data Protection legislation.

### ***External funders***

Some of our services and programmes are delivered using external funds. Where this is the case, we may be required to provide statistical or narrative information to our funders. This will typically be information about your organisation and the services received from Big Issue Invest but may include personal data. Where provided, personal data will be held by funders primarily for oversight, audit and assurance purposes to prevent fraud and ensure that funds have been spent in accordance with regulations and the purposes agreed with the funder.

### ***Service providers***

Big Issue Invest may share your personal data with third parties that help us deliver our services or products, for example by conducting organisational checks and verifications for due diligence, or providing online tools for the collection, processing and storing your data. We will only share your data with service providers where we have an appropriate data processing agreement (or similar protections) in place, and they will not be able to use your data for their own purposes (e.g. for their own marketing purposes).

We may also share your personal information with individuals who help us deliver or improve our products or services (such as external evaluators, awards panel members) or who have a legitimate interest in our work (such as committee members). Big Issue Invest will ensure that any persons authorised to access your personal data have committed themselves to confidentiality or are under an appropriate statutory obligation of confidentiality.

### ***Fraud prevention agencies***

Your personal data may be shared with fraud prevention agencies for the purpose of determining, preventing or detecting crime, or for safeguarding purposes, who will use it to prevent fraud and money laundering and to verify your identity.

### ***Agencies and authorities if required by law***

We may disclose your personal data to any law enforcement agency, court, regulator, government authority, or in connection with any legal action if we are required to do so to meet a legal or regulatory obligation, where the request is proportionate, or otherwise to protect our rights or the rights of anyone else (for example, in response to valid and properly served legal process such as a warrant). We will attempt to notify you prior to disclosing your data unless (i) prohibited by applicable law from doing so, or (ii) there are clear indications of unlawful conduct in connection with your use of BII services.

We may also disclose your personal data:

- to data protection regulatory authorities;
- in response to an enquiry from a government agency; and
- to other regulatory authorities with jurisdiction over our activities.

We will only share personal data which they need to carry out their work and subject to appropriate security measures.

### ***Related Entities***

We may share your personal data with any current or future member of TBIG, which includes our subsidiaries, any relevant ultimate holding company and its subsidiaries.

### ***Professional advisors and auditors***

We may disclose your personal data to professional advisors (such as legal advisors and accountants) or auditors for the purpose of providing professional services to us.

### ***Replacement providers***

We may also share your personal information in the following circumstances:

- if BII sells or buys any business or assets, BII may transfer your personal information to the potential seller or buyer of such business or assets; and
- if BII or substantially all of its assets are acquired by a third party, its rights to personal data held by it may be one of the transferred assets.

Otherwise, your data will only be disclosed or shared in special exceptional cases, where we are obligated or entitled to do so by statute or upon binding order from a public authority.

We will never pass on your information to third party organisations without your explicit and informed consent other than for the purposes as described above.

We do not sell or share personal details to third parties for the purposes of marketing.

## **8      **LAWFUL BASIS FOR PROCESSING YOUR PERSONAL DATA****

Personal data we hold about you will be processed for one or more of the following reasons:

- you have consented to the processing for the specific purposes described in this notice;
- we have legal and regulatory obligations that we have to discharge;
- we may need to in order to establish, exercise or defend our legal rights or for the purpose of legal proceedings; or,
- the processing is necessary for our legitimate interests (or the legitimate interests of a third party) unless your interests in data privacy and security override our legitimate interests.

We do not normally collect special category or sensitive personal data. In the event you provide us with any special category or sensitive personal data, we will take extra care to ensure your rights are protected, in accordance with applicable data protection laws.

Sensitive personal data such as ethnicity will be collected for the purposes of equal opportunities monitoring. Where we collect information for the purpose of promoting equal opportunity or treatment we rely on substantial public interest, as described in paragraph 8 of Schedule 1 of the Data Protection Act 2018.

Where you have provided us with consent to use your personal data, you can withdraw this at any time by emailing us on [dataprotection@bigissue.com](mailto:dataprotection@bigissue.com)

## **9 HOW LONG WILL WE KEEP YOUR PERSONAL DATA?**

How long we hold your personal data for will vary. The retention period will be determined by various criteria including:

- the purpose for which we are using it: we will need to keep the data for as long as is necessary for that purpose; and,
- legal obligations: laws or regulation may set a minimum period for which we have to keep your personal data.

We only keep your information for as long as we need to, to be able to use it for the reasons given in this privacy policy. In general terms we remove identifiable personal information from our records, in accordance with the following:

- Records relevant for tax purposes - 7 years from the end of the tax year to which the records relate
- Personal data held on marketing or business development records - 4 years from the last date on which you have interacted with us.

## **10 ACCURACY**

BII will take all reasonable steps to keep personal data accurate, complete, current and relevant, if it is used on an ongoing basis and based on the most recent information available to us. If we are advised of a change in information, we will update the data accordingly. Please notify us of any changes to your personal data by emailing [dataprotection@bigissue.com](mailto:dataprotection@bigissue.com)

## **11 SECURITY OF PERSONAL INFORMATION**

BII is committed to taking all reasonable and appropriate steps to protect the personal data we collect from you from against improper use or disclosure, unauthorised access, unauthorised modification, and unlawful destruction or accidental loss and against all other unlawful forms of processing.

We have taken and will take appropriate information security, technical, storage and organisational measures to such end, including measures to deal with any suspected data breach. All service providers who are involved with the processing of your information are also obliged to respect the confidentiality of your personal data. We protect your personal

data by storing it securely and ensuring only certain personnel with password protected authentication can access personal data.

Unfortunately, there is always risk involved in sending information through any channel over the internet. You send information over the internet entirely at your own risk. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted over the internet and we do not warrant the security of any information, including personal data, which you transmit to us over the internet.

If you suspect any misuse, loss, or unauthorised access to your personal data please let us know immediately using the contact details set out in this privacy notice. We will investigate the matter and update you as soon as possible on next steps.

## **12 WHERE WE TRANSFER YOUR PERSONAL DATA**

The personal data that we collect from you may be transferred to, processed and stored at a destination outside the European Economic Area (which means the 27 European Union member states, together with Norway, Iceland and Liechtenstein, “EEA”), including by our third-party service providers. Your information may also be processed by staff operating outside the EEA who work for us or for one of our service providers.

In the event that your personal data is transferred to, or stored in a country outside of the EEA, and where the country or territory in question does not maintain adequate data protection standards, we will take all reasonable steps to ensure that any such transfers are undertaken in accordance with applicable data protection and privacy laws and that your data is treated securely and in accordance with this privacy notice.

However, please note that where personal data is stored in another country, it may be accessible to law enforcement agencies in accordance with domestic laws.

## **13 YOUR RIGHTS**

You have various rights in relation to the data which we hold about you as described below.

To get in touch with us about any of your rights under applicable data protection laws, please use the contact details set out above. We will seek to deal with your request without undue delay, and in any event within any time limits provided for in applicable data protection law (subject to any extensions to which we are lawfully entitled). Please note that we may keep a record of your communications to help us resolve any issues which you raise. We may need to request specific information from you to help us confirm your identity.

### ***Right to be informed***

You have the right to be informed about how we collect and use your personal data.

### ***Right to access your information***

You have the right to request a copy of the information that we hold about you. If you would like a copy of some or all of your personal information, please let us know. If we provide you with access to the information we hold about you, we will not charge you for this unless permitted by law. If you request further copies of this information from us, we may charge you a reasonable administrative cost. Where we are legally permitted to do so, we may refuse your request. If we refuse your request, we will always tell you the reasons for doing so.

### ***Right to rectification***

You have the right to request that we rectify any inaccurate or incomplete personal data that we hold about you. If we have shared this personal data with third parties, we will notify them about the rectification unless this is impossible or involves disproportionate effort. You may also request details of the third parties that we have disclosed the inaccurate or incomplete personal data to. Where we think that it is reasonable for us not to comply with your request, we will explain our reasons for this decision.

### ***Right to erasure***

You have the right to request that we "erase" your personal data in certain circumstances. Normally, this right exists where:

- the data is no longer necessary;
- you have withdrawn your consent to us using your data, and there is no other valid reason for us to continue;
- the data has been processed unlawfully;
- it is necessary for the data to be erased in order for us to comply with our obligations under law; or
- you object to the processing and we are unable to demonstrate overriding legitimate grounds for our continued processing.

We would only be entitled to refuse to comply with your request for erasure in limited circumstances and we will always tell you our reason for doing so. When complying with a valid request for the erasure of data we will take all reasonably practicable steps to delete the relevant data.

### ***Right to restrict processing***

You have the right to request that we restrict our processing of your personal data in certain circumstances, for example if you dispute the accuracy of the personal data that we hold about you or you object to our processing of your personal data for our legitimate interests. If we have shared your personal data with third parties, we will notify them about the restricted processing unless this is impossible or involves disproportionate effort. We will, of course, notify you before lifting any restriction on processing your personal data.

### ***Right to data portability***

This only applies to information you have given us. You have the right to get your personal data from us in a way that is accessible and machine-readable, for example as a csv file. You also have the right to ask us to transfer your data to another organisation. We must do this if the transfer is, as the regulation says, “technically feasible”.

The right only applies if we are processing information based on your consent or for the purpose of performing a contract with you.

### ***Right to object***

This right enables you to object to us processing your personal data where we do so for one of the following reasons:

- because it is in our legitimate interests to do so;
- to enable us to perform a task in the public interest or exercise official authority;
- to send you direct marketing materials; or
- for scientific, historical, research, or statistical purposes.

## **14 HOW TO COMPLAIN**

You have the right to make a complaint to your local supervisory authority which is the Information Commissioner’s Office. You can contact them in the following ways:

- Phone: 0303 123 1113
- Email: [icocasework@ico.org.uk](mailto:icocasework@ico.org.uk)
- Post: Information Commissioner’s Office, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF

Please raise your concern with us first, by emailing [dataprotection@bigissue.com](mailto:dataprotection@bigissue.com) and we will do our best to help.

## **15 CHANGES TO THIS PRIVACY NOTICE**

Any changes we make to this privacy notice in the future will be posted on our website and we may email you to tell you about any significant changes. Please check back regularly to see any updates or changes.