



Privacy & Cookies Policy

1. ABOUT THIS POLICY

- 1.1. This privacy and cookies policy ("**Policy**") sets out the basis on which personal data collected from you will be processed by us, including through:
 - 1.1.1. your use of our websites, microsites, portals, platforms and tools;
 - 1.1.2. your application to our events, programmes and other opportunities;
 - 1.1.3. your participation in our events, programmes and other tools and offerings;
 - 1.1.4. your registration to receive our newsletter and other relevant news;
 - 1.1.5. your collaboration with us, including our delivery of services; and
 - 1.1.6. our own research and innovation activities.
- 1.2. This website, and all other websites, microsites, portals, platforms and tools are not intended for children and we do not knowingly collect personal data relating to children.
- 1.3. It is important that you read this Policy together with any other privacy notice and/or privacy statement 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 Policy supplements other notices and privacy policies and is not intended to override them.

2. CONTROLLER

- 2.1. Digital Catapult Group of companies is made up of Digital Catapult (UK company reference number 07964699) and its wholly owned permanent subsidiary company, Digital Catapult Services Limited's (UK company reference number 08564481).
- 2.2. This Privacy Policy is issued on behalf of the Digital Catapult Group, so when we mention "**we**", "**us**" or "**our**" in this Policy, we are referring to the relevant company in the Group responsible for processing your data. Information is controlled by Digital Catapult, except where:
 - 2.2.1. we explicitly contract with you that Digital Catapult Services Limited is the controller of personal data in respect of the supply of goods and services to you; or
 - 2.2.2. you are otherwise notified that Digital Catapult Services Limited is the controller of your information.
- 2.3. Digital Catapult is the controller and responsible for this website.
- 2.4. If you have any questions about this Policy or our privacy practices, please contact us:
 - 2.4.1. by email at privacy@digicatapult.org.uk; or
 - 2.4.2. by writing to us at Digital Catapult, Level 9, 101 Euston Road, London, NW1 2RA, marked as a "Personal Data Enquiry".

3. THE TYPES OF PERSONAL DATA WE COLLECT ABOUT YOU

- 3.1. Personal data means any information about an individual from which that person can be identified.
- 3.2. We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

- 3.2.1. **Identity Data:** includes first name, last name, titles or honorifics, job title, employer, title, nationality, ethnicity, date of birth, gender, signature, National Insurance number, photographs, videos, and audio recordings.
- 3.2.2. **Health Data:** includes disabilities and special accessibility needs, and dietary requirements.
- 3.2.3. **Contact Data:** includes email address, postal address and telephone numbers.
- 3.2.4. **Financial Data:** includes bank account, VAT registration number, County Court Judgements (and other Orders), and other payment details.
- 3.2.5. **Recruitment Data:** for job applicants, this includes Baseline Personnel Security Standard as standard, and Security Clearance checks where required for the recruited role.
- 3.2.6. **Transaction Data:** includes details about payments to and from you and other details of products and services you have purchased from us or provided by us to you.
- 3.2.7. **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 or any other Catapult website, microsite, portal, platform and tool.
- 3.2.8. **Profile Data:** includes your username and password, purchases or orders made by you, your interests, preferences, feedback and survey responses.
- 3.2.9. **Usage Data:** includes information about how you use our websites, microsites, portals, platforms and tools, products and services.
- 3.2.10. **Marketing and Communications Data:** includes your preferences in receiving marketing from Us and our third parties and your communication preferences
- 3.3. We also collect, use and share anonymised and/or aggregated data such as statistical or demographic data which is not personal data as it does not directly (or indirectly) reveal your identity. For example, we may aggregate individuals' Usage Data to calculate the percentage of users accessing a specific website feature in order to analyse general trends in how users are interacting with our website to help improve the website and our service offering.

4. HOW IS YOUR PERSONAL DATA COLLECTED?

- 4.1. We use different methods to collect data from and about you including through:
 - 4.1.1. **Your interactions with us.** You may give us your personal data by filling in online forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:
 - 4.1.1.1. apply for our events, programmes and other opportunities;
 - 4.1.1.2. create an account on our website, microsite, portal, platform or tool;
 - 4.1.1.3. have provided information to us by applying for a job opportunity;
 - 4.1.1.4. subscribe to our newsletter or other publications;
 - 4.1.1.5. request marketing to be sent to you;
 - 4.1.1.6. enter a competition, promotion or survey;
 - 4.1.1.7. are supplying services to us;
 - 4.1.1.8. have attended our offices or events;
 - 4.1.1.9. have expressed your intention to gain access to our prototype/software download platform(s);
 - 4.1.1.10. have participated in a survey, for research or otherwise, conducted either by ourselves directly or through a Third Party provider acting on our behalf;

- 4.1.1.11. provided your business card or contact information to a member of our staff during an engagement/interaction; or
- 4.1.1.12. give us feedback or contact us.
- 4.1.2. **Automated technologies or interactions.** As you interact with our websites, microsites, portals, platforms and tools, we will automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies and other similar technologies. Please see paragraph 6 for further details.
- 4.1.3. **Third parties or publicly available sources.** We will receive personal data about you from various third parties and public sources, including:
 - 4.1.3.1. your company/employer's website;
 - 4.1.3.2. Social media platforms, such as LinkedIn;
 - 4.1.3.3. Sanctions lists;
 - 4.1.3.4. Credit reference agencies;
 - 4.1.3.5. Disclosure and Barring Service (recruitment and specific notified service providers only);
 - 4.1.3.6. your contact details that are available via a third party that has the right to pass them onto us for our particular use e.g. your employer; and
 - 4.1.3.7. your personal data available on other publicly-available websites, or public or proprietary databases, such as Companies House.

5. HOW WE USE YOUR PERSONAL DATA

5.1. Legal Basis

5.1.1. The law requires us to have a legal basis for collecting and using your personal data. We rely on one or more of the following legal bases:

- 5.1.1.1. **Performance of a contract with you:** Where we need to perform the contract we are about to enter into or have entered into with you.
- 5.1.1.2. **Legitimate interests:** We may use your personal data where it is necessary to conduct our business and pursue our legitimate interests, for example to prevent fraud and enable us to give you the best and most secure customer experience. We make sure we consider and balance any potential impact on you and your rights (both positive and negative) before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law).
- 5.1.1.3. **Legal obligation:** We may use your personal data where it is necessary for compliance with a legal obligation that we are subject to. We will identify the relevant legal obligation when we rely on this legal basis.
- 5.1.1.4. **Consent:** We rely on consent only where we have obtained your active agreement to use your personal data for a specified purpose, for example if you subscribe to an email newsletter.

5.2. Special Category Data

5.2.1. We may collect Special Categories of personal data ("**Special Category Data**") about you in specific limited circumstances e.g. our recruitment process, and diversity surveys. Special Category Data includes details about your race or ethnicity, religious or philosophical beliefs, sexual orientation, political opinions, trade union membership, health, and genetic and biometric data, together with information about criminal convictions and offences.

5.2.2. Where we process Special Category Data we do so on the grounds that the conditions in Article 9.2(a) explicit consent (for diversity surveys, recruitment, catering dietary requirements (where necessary) and site/programme access requirements), and Article 9.2(b) employment, social security, and social protection law (for recruitment), as applicable, are met.

5.2.3. Where relevant, we will collect Special Category Data anonymously, or anonymise such collected data, in which case this data will no longer be personal data as this data will not directly or indirectly reveal your identity or be linked to you.

5.3. Purposes for which we will use your personal data

5.3.1. We have set out below in the “Personal Data Table” a description of all the ways we plan to use the various categories of 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.

5.3.2. We may further specify usage, legal basis and retention periods in privacy statements and notices provided to you where applicable.

<u>PERSONAL DATA TABLE</u>			
<u>Purpose/Activity/Use</u>	<u>Type of data</u>	<u>Legal Basis</u>	<u>Retention Period</u>
Visitors to Digital Catapult Sites			
CCTV Recordings (at Catapult premises)	(i) Identity Data (ix) Usage Data	(ii) Legitimate Interests (H&S & Security)	30 days
Visitor Logs	(i) Identity Data (iii) Contact data (ix) Usage Data	(ii) Legitimate Interests (H&S & Security)	2 months
ID Access Logs	(i) Identity Data (ix) Usage Data	(ii) Legitimate Interests (H&S & Security + utility metrics)	3 months
Collaborator, Customer, Partner & Supplier Representatives			
Marketing database records (e.g. lead generation, meeting feedback, contact data, business proposals)	(i) Identity Data (iii) Contact data (x) Marketing & Communications Data	(ii) Legitimate Interests (contacting recipient with their data made available for contact)	6 months – non-qualified / 5 years 3 months – qualified
Unsuccessful Tenders	(i) Identity Data (iii) Contact data (iv) Financial Data (vi) Transaction Data (vii) Technical Data (viii) Profile Data	(i) Performance of contract (ii) Legitimate Interests (factual recording) (iii) Legal Obligation	2 years

	(ix) Usage Data (x) Marketing & Communications Data		
Customer relations database records (e.g. contact data, telephone attendance records, queries, meeting feedback, account history etc.).	(i) Identity Data (iii) Contact data (ix) Usage Data (x) Marketing & Communications Data	(i) Performance of contract (ii) Legitimate Interests (factual recording and Impact Assessments) (iv) Consent	6 years from last contact
Event & Opportunity Registrants	(i) Identity Data (iii) Contact data (ix) Usage Data (x) Marketing & Communications Data	(i) Performance of contract (ii) Legitimate Interests (factual recording)	18 months
Open calls (participants)	(i) Identity Data (iii) Contact data (iv) Financial Data (vi) Transaction Data (vii) Technical Data (viii) Profile Data (ix) Usage Data (x) Marketing & Communications Data	(i) Performance of contract (ii) Legitimate Interests (factual recording, impact reporting)	7 years
Applicant/Participant EDI Records	(i) Identity Data (ii) Health Data (iii) Contact data (ix) Usage Data (x) Marketing & Communications Data	(i) Performance of contract (ii) Legitimate Interests (diversity monitoring)	15 months
Private Event Recordings	(i) Identity Data (iii) Contact data (ix) Usage Data	(i) Performance of contract (ii) Legitimate Interests (factual recording) (iii) Legal Obligation (iv) Consent	1 year unless otherwise notified or contracted
Public Event Recordings	(i) Identity Data (iii) Contact data (vi) Usage Data	(i) Performance of contract (ii) Legitimate Interests (factual recording)	Indefinite

Marketing & Research Records			
Contact details available online, including from private sources	(i) Identity Data (iii) Contact data (x) Marketing & Communications Data	(ii) Legitimate Interests (use of available data as believed to be intended)	6 months
Newsletter recipients	(i) Identity Data (iii) Contact data (vi) Transaction Data (vii) Technical Data (viii) Profile Data (ix) Usage Data (x) Marketing & Communications Data	(i) Performance of contract (iv) Consent	6 years
Opt-out/suppression lists	(i) Identity Data (iii) Contact data (x) Marketing & Communications Data	(iii) Legal Obligation	Indefinite (until overridden)
Market Research	(i) Identity Data (iii) Contact data (vi) Transaction Data (viii) Profile Data	(i) Performance of contract (ii) Legitimate Interests (undertaking research) (iv) Consent	25 months
Websites, microsites, portals, platforms and tools analytics reports from cookies and other similar technology	(i) Identity Data (vii) Technical Data (viii) Profile Data (ix) Usage Data	(ii) Legitimate Interests (performance and analytics) (iv) Consent (see opt in/out browser settings and cookie privacy statement pop-up)	25 months
Records			
Records - Contract / Deed	(i) Identity Data (iii) Contact data (iv) Financial Data (vi) Transaction Data (ix) Usage Data (x) Marketing & Communications Data	(i) Performance of contract (ii) Legitimate Interests (factual recording) (iii) Legal Obligation	7 years (if contract) 11 years (if subject to subsidy control) 13 years (if deed)

Records – Health & Safety	(i) Identity Data (ii) Health Data (iii) Contact data (vi) Transaction Data	(i) Performance of contract (ii) Legitimate Interests (factual recording) (iii) Legal Obligation	7 years (unless COSHH related = 45 years)
Records – Marketing Records	(i) Identity Data (iii) Contact data (x) Marketing & Communications Data	(ii) Legitimate Interests (factual recording) (iv) Consent	6 years from date consent withdrawn or ceases to be valid
Records - Procurement	(i) Identity Data (iii) Contact data (iv) Financial Data (vi) Transaction Data (x) Marketing & Communications Data	(i) Performance of contract (ii) Legitimate Interests (factual recording) (iii) Legal Obligation	7 Years
Records – Recruitment	(i) Identity Data (ii) Health Data (v) Recruitment Data (x) Marketing & Communications Data	(i) Performance of contract (ii) Legitimate Interests (factual recording) (iii) Legal Obligation	27 months from notification (except Catapult employees)

5.4. Direct Marketing

5.4.1. During the engagement process with us, whether on our websites, microsites, portals, platforms and tools, email, in person or otherwise, when your personal data is collected, you may be asked to indicate your preferences for receiving direct marketing communications from us. You will receive marketing communications from us if you have requested information from us, purchased goods or services from us, or have otherwise engaged with Digital Catapult and you have not opted out of receiving the marketing.

5.4.2. We may also analyse your Identity, Contact, Technical, Usage and Profile Data to form a view which products, services and offers may be of interest to you so that we can then send you relevant marketing communications.

5.5. Third Party Marketing

5.5.1. We will get your express consent before we share your personal data with any third party for their own direct marketing purposes, unless they are also a several controller of the personal data, as notified at the point of data collection.

5.6. Opting Out of Marketing

5.6.1. You can ask us to stop sending you marketing communications at any time by:

- 5.6.1.1. logging into the website and checking or unchecking relevant boxes to adjust your marketing preferences (where available), or
- 5.6.1.2. by following the opt-out links within any marketing communication sent to you.

5.6.2. If you opt out of receiving marketing communications, you will still receive service-related communications that are essential for administrative or customer service purposes, for example those relating to a contract we have with you.

6. Cookies & IP Addresses

- 6.1. We may collect information about your mobile phone, computer or other device from which you access our website(s), portals and tools including where available your IP address, operating system and browser type, for systems administration and to analyse and report aggregate data. This is statistical data about our users' browsing actions and patterns, and does not identify any individual. We may, however, use such information in conjunction with the data we have about you in order to track your usage of our services.
- 6.2. Our websites, microsites, portals, platforms and tools use cookies to distinguish you from other users of our services. This helps us to provide you with a good experience when you browse and use our websites, microsites, portals, platforms and tools, and also allows us to improve our services. By using our websites, microsites, portals, platforms and tools you agree to our use of cookies as more specifically set out below.
- 6.3. A cookie is a small file of letters and numbers that we store on your browser or the hard drive of your computer if you agree. Cookies contain information that is transferred to your computer's hard drive.
- 6.4. The cookies we use include:
 - 6.4.1. **"Analytical"** cookies: They allow us to recognise and count the number of visitors and to see how visitors move around the website when they are using it. This helps us to improve the way our website works, for example, by ensuring that users are finding what they are looking for easily.
 - 6.4.2. **"Strictly necessary"** cookies: These are cookies that are required for the operation of our website. They include, for example, cookies that enable you to log into secure areas of our website, use a shopping cart or make use of e-billing services.
 - 6.4.3. **"Functionality"** cookies: These are used to recognise you when you return to our website. This enables us to personalise our content for you, greet you by name and remember your preferences (for example, your choice of language or region).
 - 6.4.4. **"Targeting"** cookies: These cookies record your visit to our websites, microsites, portals, platforms and tools, the pages you have visited and the links you have followed to our affiliates websites. We will use this information to make our websites, microsites, portals, platforms and tools, offers e-mailed to you and the advertising displayed on it more relevant to your interests. We may also share this information with third parties for this purpose.
- 6.5. Please note that third party affiliates may also use cookies, over which we have no control.
- 6.6. You may block cookies by activating the setting on your browser that allows you to refuse the setting of all or some cookies. However, if you use your browser settings to block all cookies (including strictly necessary cookies) you may not be able to access all or parts of our websites, microsites, portals, platforms and tools. Unless you have adjusted your browser setting so that it will refuse cookies, our system will issue cookies as soon as you visit our websites, microsites, portals, platforms and tools, subject to any additional pop up controls, providing you with greater control and clarity on the cookies.

7. Disclosures of your personal data

- 7.1. We may share your personal data where necessary with our service providers for the purposes set out in the Personal Data Table.
- 7.2. We may also share your data with third parties notified to you at the point of collection of your data.

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- 7.3. 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.

8. International Transfers

- 8.1. We may transfer your personal data to service providers that carry out certain functions on our behalf. This may involve transferring personal data outside the UK to countries which have laws that do not provide the same level of data protection as the UK law.
- 8.2. Whenever we transfer your personal data out of the UK to service providers, we ensure a similar degree of protection is afforded to it by ensuring that at least one of the following safeguards are in place:
- 8.2.1. we will only transfer your personal data to countries that have been deemed by the UK to provide an adequate level of protection for personal data;
- 8.2.2. we may use specific standard contractual terms approved for use in the UK which give the transferred personal data the same protection as it has in the UK, namely the International Data Transfer Agreement, or The International Data Transfer Addendum to the European Commission's standard contractual clauses for international data transfers; or
- 8.2.3. we may use the UK Extension to the EU-US Data Privacy Framework" (UK Extension) under Article 45 of the UK General Data Protection Regulation (GDPR).

9. Data Security

- 9.1. 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.
- 9.2. Unfortunately, the transmission of information via the internet is not completely secure. Although we will try to protect your personal data, we cannot guarantee the security of your data transmitted to our websites, microsites, portals, platforms and tools; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.
- 9.3. 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.

10. Data Retention

- 10.1. Details of retention periods for different aspects of your personal data are set out in the Personal Data Table.
- 10.2. In some circumstances we will 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.

11. Your Legal Rights

- 11.1. You have a number of rights under data protection laws in relation to your personal data. You have the right to:

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- 11.1.1. Request access to your personal data (commonly known as a "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.
- 11.1.2. 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.
- 11.1.3. Request erasure of your personal data in certain circumstances. 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.
- 11.1.4. Object to processing of your personal data where we are relying on a legitimate interest (or those of a third party) as the legal basis for that particular use of your data (including carrying out profiling based on our legitimate interests). In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your right to object.
- 11.1.5. You also have the absolute right to object any time to the processing of your personal data for direct marketing purposes (see Opting Out of Marketing in paragraph 5.6 for details of how to object to receiving direct marketing communications).
- 11.1.6. 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.
- 11.1.7. Withdraw consent at any time where we are relying on consent to process your personal data (see Data Protection Table for details of when we rely on your consent as the legal basis for using your 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.
- 11.1.8. Request restriction of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in one of the following scenarios:
- 11.1.8.1. If you want us to establish the data's accuracy;
 - 11.1.8.2. Where our use of the data is unlawful but you do not want us to erase it;
 - 11.1.8.3. 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
 - 11.1.8.4. You have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.
- 11.2. If you wish to exercise any of the rights set out above, please contact us using the contact details in paragraph 12.
- 11.3. **No Fee Usually Required**
- 11.3.1. 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 could refuse to comply with your request in these circumstances.
- 11.4. **What we may need from you**

11.4.1.1. 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.

11.5. **Time limit to respond**

11.5.1. We try to respond to all legitimate requests within one month. Occasionally it could 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.

12. **Contact Details**

12.1. If you have any questions about this Policy or about the use of your personal data or you want to exercise your privacy rights, please us in one of the following ways:

12.1.1. Email address: Privacy @ Digicatapult.org.uk

12.1.2. Postal address: Data Privacy Manager, Level 9, 101 Euston Road, London, NW1 2RA

13. **Complaints**

13.1. You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK regulator 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.

14. **Changes to your Personal Data and the Privacy Policy**

14.1. We keep our privacy policy under regular review and will update it from time to time. This is version 1.0.

14.2. It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us, for example a new address or email address

15. **Third Party Links**

15.1. The websites, microsites, portals, platforms and tools 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 policy of every website you visit.