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## PRIVACY POLICY

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### BACKGROUND:

Cool Ventures Limited understands that your privacy is important to you and that you care about how your personal data is collected, stored and used. We respect and value the privacy of everyone who visits this website, [www.coolventures.co.uk](http://www.coolventures.co.uk) ("Our Site") and to whom we provide services and will only collect and use personal data in ways that are described here, and in a manner that is consistent with Our obligations and your rights under the law.

Please read this Privacy Policy carefully and ensure that you understand it. Your acceptance of Our Privacy Policy is deemed to occur upon your first use of Our Site or on registration for one of our services.

### 1. Definitions and Interpretation

In this Policy, the following terms shall have the following meanings:

- "personal data"** means any and all data that relates to an identifiable person who can be directly or indirectly identified from that data. In this case, it means personal data that you give to Us via registration for our services or Our Site. This definition shall, where applicable, incorporate the definitions provided in the Regulation 2016/679 – the General Data Protection Regulation ("GDPR"); and
- "We/Us/Our"** means Cool Ventures Limited,

### 2. Information About Us

- 2.1 Cool Ventures Limited, a limited company registered in England under company number 7713005, whose registered address is Fromeforde House, Church Road, Yate, Bristol BS37 5JB.
- 2.2 Our Site is owned and operated by Cool Ventures Limited.
- 2.3 Our VAT number is 126 9835 82.
- 2.4 Our Data Protection Officer is Sue Marchant, and can be contacted by email at [sue.marchant@coolventures.co.uk](mailto:sue.marchant@coolventures.co.uk), by telephone on 01225 580850, or by post at Fromeforde House, Church Road, Yate, Bristol BS37 5JB.

### 3. What Does This Policy Cover?

This Privacy Policy applies to your use of Our Services and Our Site. Our Site may contain links to other websites. Please note that We have no control over how your data is collected, stored, or used by other websites and We advise you to check the privacy policies of any such websites before providing any data to them.

### 4. Your Rights

- 4.1 As a data subject, you have the following rights under the GDPR, which this Policy and Our use of personal data have been designed to uphold:

- 4.1.1 The right to be informed about Our collection and use of personal data;
  - 4.1.2 The right of access to the personal data We hold about you (see section 12);
  - 4.1.3 The right to rectification if any personal data We hold about you is inaccurate or incomplete (please contact Us using the details in section 13);
  - 4.1.4 The right to be forgotten – i.e. the right to ask Us to delete any personal data We hold about you (We only hold your personal data for a limited time, as explained in section 6 but if you would like Us to delete it sooner, please contact Us using the details in section 13);
  - 4.1.5 The right to restrict (i.e. prevent) the processing of your personal data;
  - 4.1.6 The right to data portability (obtaining a copy of your personal data to re-use with another service or organisation);
  - 4.1.7 The right to object to Us using your personal data for particular purposes; and
  - 4.1.8 Rights with respect to automated decision making and profiling.
- 4.2 If you have any cause for complaint about Our use of your personal data, please contact Us using the details provided in section 13 and We will do Our best to solve the problem for you. If We are unable to help, you also have the right to lodge a complaint with the UK’s supervisory authority, the Information Commissioner’s Office.
- 4.3 For further information about your rights, please contact the Information Commissioner’s Office or your local Citizens Advice Bureau.

## 5. What Data Do We Collect?

Depending upon your use of Our Services, We may collect some or all of the following personal and non-personal data:

- 5.1 name;
- 5.2 date of birth;
- 5.3 Diversity and Equality data – gender, race and disability (the monitoring of this information is a statutory duty for all public authorities and publicly funded programmes)
- 5.4 business/company name
- 5.5 job title;
- 5.6 profession;
- 5.7 contact information such as email addresses and telephone numbers;
- 5.8 demographic information such as post code, preferences, and interests;
- 5.9 IP address;
- 5.10 web browser type and version;
- 5.11 operating system;
- 5.12 a list of URLs starting with a referring site, your activity on Our Site, and the site you exit to;

## 6. How Do We Use Your Data?

- 6.1 All personal data is processed and stored securely, for no longer than is necessary in light of the reason(s) for which it was first collected. We will comply with Our obligations and safeguard your rights under the GDPR at all times. For more details on security see section 7, below.
- 6.2 Our use of your personal data will always have a lawful basis, either because it is necessary for Our performance of a contract with you, because you have consented to Our use of your personal data (e.g. by subscribing to emails), or because it is in Our legitimate interests. Specifically, We may use your data for the following purposes:
  - 6.2.1 Supplying Our products **AND/OR** services to you (please note that We require your personal data in order to enter into a contract with you);
  - 6.2.2 Personalising and tailoring Our products **AND/OR** services for you;
  - 6.2.3 Replying to emails from you;
  - 6.2.4 Supplying you with emails that you have opted into (you may unsubscribe or opt-out at any time by emailing [info@coolventures.co.uk](mailto:info@coolventures.co.uk) or clicking on the unsubscribe link within the email);
  - 6.2.5 Market research;
  - 6.2.6 Reporting to third parties where products and/or services have been provided to you at their cost.
- 6.3 With your permission and/or where permitted by law, We may also use your data for marketing purposes which may include contacting you by email **AND/OR** telephone **AND/OR** text message **AND/OR** post with information, news, and offers on Our products **AND/OR** services. We will not, however, send you any unsolicited marketing or spam and will take all reasonable steps to ensure that We fully protect your rights and comply with Our obligations under the Data Protection Act 1998 **OR** GDPR and the Privacy and Electronic Communications (EC Directive) Regulations 2003.
- 6.4 You have the right to withdraw your consent to Us using your personal data at any time, and to request that We delete it.
- 6.5 We do not keep your personal data for any longer than is necessary in light of the reason(s) for which it was first collected. Data will therefore be retained for the following periods (or its retention will be determined on the following bases):
  - 6.5.1 Where Personal data has been obtained in order to deliver funded services, this may be retained for a period of up to 6 years following the end of the relevant contract ;
  - 6.5.2 Other data may be retained for up to 3 years from the end of any contractual delivery.

## 7. **How and Where Do We Store Your Data?**

- 7.1 We only keep your personal data for as long as We need to in order to use it as described above in section 6, and/or for as long as We have your permission to keep it.
- 7.2 Some or all of your data may be stored outside of the European Economic Area (“the EEA”) (The EEA consists of all EU member states, plus Norway, Iceland, and Liechtenstein). You are deemed to accept and agree to this by using Our Services or Site and submitting information to Us. If We do store data outside the EEA, We will take all reasonable steps to ensure that your data is treated as safely and securely as it would be within the UK and under the GDPR including:
  - 7.2.1 Ensuring all Data processors are in approved countries or comply with the Privacy Shield requirements.
- 7.3 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.
  - 7.3.1 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. **Do We Share Your Data?**

- 8.1 Subject to section 8.2, We will not share any of your data with any third parties for any purposes other than those to which you specifically agree when entering a contract funded by a third party.
- 8.2 In certain circumstances, We may be legally required to share certain data held by Us, which may include your personal data, for example, where We are involved in legal proceedings, where We are complying with legal obligations, a court order, or a governmental authority.

We may sometimes contract with third parties to supply services to you on Our behalf. These may include payment processing, delivery of services, search engine facilities, advertising, and marketing. In some cases, the third parties may require access to some or all of your data. Where any of your data is required for such a purpose, We will take all reasonable steps to ensure that your data will be handled safely, securely, and in accordance with your rights, Our obligations, and the obligations of the third party under the law.

- 8.3 We may compile statistics about the use of Our Site including data on traffic, usage patterns, user numbers, sales, and other information. All such data will be anonymised and will not include any personally identifying data, or any anonymised data that can be combined with other data and used to identify you. We may from time to time share such data with third parties such as prospective investors, affiliates, partners, and advertisers. Data will only be shared and used within the bounds of the law.
- 8.4 We may sometimes use third party data processors that are located outside of the European Economic Area (“the EEA”) (The EEA consists of all EU

member states, plus Norway, Iceland, and Liechtenstein). Where We transfer any personal data outside the EEA, We will take all reasonable steps to ensure that your data is treated as safely and securely as it would be within the UK and under the GDPR including:

8.4.1 Ensuring compliance with Privacy Shield requirements.

## 9. **What Happens If Our Business Changes Hands?**

9.1 We may, from time to time, expand or reduce Our business and this may involve the sale and/or the transfer of control of all or part of Our business. Any personal data that you have provided will, where it is relevant to any part of Our business that is being transferred, be transferred along with that part and the new owner or newly controlling party will, under the terms of this Privacy Policy, be permitted to use that data only for the same purposes for which it was originally collected by Us.

9.2 In the event that any of your data is to be transferred in such a manner, you may not be contacted in advance and informed of the changes.

## 10. **How Can You Control Your Data?**

10.1 When you register for one of Our Services or submit personal data via Our Site, you may be given options to restrict Our use of your data. In particular, We aim to give you strong controls on Our use of your data for direct marketing purposes (including the ability to opt-out of receiving emails from Us which you may do by unsubscribing using the links provided in Our emails and at the point of providing your details).

10.2 You may also wish to sign up to one or more of the preference services operating in the UK: The Telephone Preference Service (“the TPS”), the Corporate Telephone Preference Service (“the CTPS”), and the Mailing Preference Service (“the MPS”). These may help to prevent you receiving unsolicited marketing. Please note, however, that these services will not prevent you from receiving marketing communications that you have consented to receiving.

## 11. **Your Right to Withhold Information**

You may access certain areas of Our Site without providing any data at all. However, to use all features and functions available, you may be required to submit or allow for the collection of certain data.

## 12. **How Can You Access Your Data?**

You have the right to ask for a copy of any of your personal data held by Us (where such data is held). Under the GDPR, no fee is payable and We will provide any and all information in response to your request free of charge. Please contact Us for more details at [info@coolventures.co.uk](mailto:info@coolventures.co.uk), or using the contact details below in section 13.

## 13. **Contacting Us**

If you have any questions about this Privacy Policy, please contact Us by email at [info@coolventures.co.uk](mailto:info@coolventures.co.uk), by telephone on 01225 580850, or by post at Fromeforde

House, Church Road, Yate Bristol BS37 5JB. Please ensure that your query is clear, particularly if it is a request for information about the data We hold about you (as under section 12, above).

14. **Changes to Our Privacy Policy**

We may change this Privacy Policy from time to time (for example, if the law changes). Any changes will be immediately posted on Our Site and you will be deemed to have accepted the terms of the Privacy Policy on your first use of Our Site or on registering for one of our services, following the alterations. We recommend that you check this page regularly to keep up-to-date.