

Startup Direct PRIVACY AND DATA – SHARING POLICY

About this Privacy Code

This privacy code provides an overview of how Startup Direct (the Company) will comply with data protection legislation to protect the rights of the individuals we deal with. It sets out:

- Who we are and what we do
- How we collect personal information
- What personal information we collect, and why
- How we safeguard personal information
- With whom we share personal information, and why
- Obligations on data sharing protections
- Applicants' rights under data protection legislation
- How to make a complaint
- How to find out more.

Who We Are and What We Do

Startup Direct is an independent organisation established primarily to deliver the Government's Start Up Loans scheme.

Our contact details are set out on our website and can be found at www.startupdirect.org.

How We Collect Personal Information

Applicant information is collected through the Startup Direct website.

We need applicants to give us certain information, which will be indicated.

We do keep a record of traffic data which is logged automatically by our server, such as applicants' IP address, the URL visited before ours, the URL visited after leaving our site and which pages are visited.

We also collect some site statistics such as page hits and page views. We are not readily able to identify any individual from traffic data or site statistics.

The website provides telephone and email addresses for you to contact us. We will collect information from you through any of these methods. We may also collect other information from applicants after their initial contact with us.

- Where the applicant heard about Start Up Loans

Research Statistics

We anonymise the information we collect and then use it to produce and publish statistics on Startup Direct activity. We will always ensure the statutory safeguards for statistical research are in place. So we will never use personal information in the course of this research to support measures or decisions with respect to particular individuals or in such a way that is likely to cause substantial damage or substantial distress to any individual.

Any resulting research statistics will not be made available in a form which identifies individuals, unless those individuals have agreed to be identified.

How We Safeguard Personal Information

We recognise that applicants retain rights in the personal information we hold about them. We will keep that information secure, and use it only for specific legitimate purposes.

We Have Obligations to Keep Personal Information Secure, Which We Take Seriously

We will keep personal information secure by taking appropriate technical and staff measures against the unauthorised or unlawful processing of that information and against its accidental loss, destruction or damage.

The Startup Direct Office Manager has overall responsibility for implementation of security procedures.

Confidential Information

Please note that under the Freedom of Information Act 2000, we are only permitted to protect information that is actually confidential in law and where if we were to disclose it, we could be sued for breach of confidence. Information you give us which you may consider to be confidential, or may mark as confidential, may in fact not be confidential in law. However in respect of any information we receive from you that is truly confidential, we will take steps to ensure it remains confidential. Unauthorised disclosure or misuse of personal information by staff will lead to disciplinary action.

We Review Our Policies and Audit Our Procedures Regularly

We review this code and our other data protection policies regularly to make sure they are appropriate and up to date. We also carry out regular audits to monitor our security policies and procedures and revise them if necessary.

Your Rights Under Data Protection Legislation

Applicants have various rights. They are most likely to want to exercise the following:

- Their right to see a copy of the information we hold about them (with the exception of the assessment of your application), on payment of a statutory fee which is currently £10. Before we agree to this, they must provide us with sufficient evidence of their identity and sufficient details of the information they wish to see to enable us to locate it.
- Their right to be removed from our mailing lists, and those of our partner organisations. Instructions on how to stop further mailings will usually be contained in any direct marketing material we send out. Otherwise please contact our Data Protection Officer James Pattison.
- Their right to correct any errors in information we hold about them, and to change or correct any details you have already given us. Please inform us about changes to your details so that we can keep our records accurate and up to date.

How to Make a Complaint

Any complaints about our or our partner organisations' handling of personal information must be made in writing and sent by post to:

Startup Direct,

1 & 5 Bath Street

London

EC1V 9LB

by email to: apply@startupdirect.org

We aim to respond to your complaint within 21 days of receiving it. We will always review our procedures and practices in line with any justified complaints.