DATA PRIVACY NOTICE

IMPACT SOLUTIONS

INTRODUCTION

We're sharing this privacy notice as you have expressed an interest in receiving investment or grant from one of Resonance's funds or grant programmes, or are considering using one of our other products or services. In order to progress this interest, we may need to collect personal information from you from time to time. This information could be collected either through direct communications, online forms or files that you share with us. This personal information is classified as personal data under the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018 and therefore we are issuing this privacy notice to explain how we use this personal data and your rights as a 'data subject'.

This privacy notice does not cover the collection of special category data*. If there is a future requirement to collect any such special category data, we will do that through a separate defined mechanism and privacy notice.

** special category data is a special subset of personal data that includes things like your political opinions, religious, health and lifestyle information. Please refer to the Information Commissioners Office for more detail on the definition of special category data.*

DATA CONTROLLER AND DATA PROTECTION LEAD

Resonance Ltd is the Data Controller, and may operate on behalf of one of its subsidiaries. Our contact details are:

Resonance Ltd
The Great Barn
5 Scarne Court
Hurdon Road
Launceston,
PL15 9LR
UK.
Email: communications@resonance.ltd.uk
Phone: 01566 457150

For any questions about this privacy notice or further clarity on how your personal data is processed, you can use your normal points of contact at Resonance, or the above details or contact direct our Data Protection Lead using the email: dpl@resonance.ltd.uk

PURPOSES OF PROCESSING

As mentioned in the Introduction any non-special category personal data is collected in order for us to be able to progress your engagement with us as a potential beneficiary of investment, grants, products and services provided by Resonance. For example:

- evaluate whether one of Resonance's products or services is a good fit with your declared interest and provide information to you about that product or service;
- providing services you have requested and notifying you about important changes or developments to these services;
- responding to your correspondence or processing your requests in relation to your information;
- to follow up as part of our customer care procedures;
- internal record keeping;
- administering offers;
- due diligence, audit, crime detection, prevention and prosecution;
- evaluating our work and for research, training and statistical analysis with the aim of improving our products and services;

We may contact you in writing, by phone or email. If you have a preferred method of contact, please let us know.

The personal data you provide will not be used to make automated decisions or used in automated profiling about you as a data subject.

If we are providing you with products or services, you will also be subject to the specific terms and conditions relating to these, which may include additional information as to how we may contact you.

LEGAL BASIS FOR PROCESSING

The legal basis for processing personal data collected through this process is:

Legitimate interests
Our legitimate interest is in responding to enquiries, administering relevant activities and maintaining appropriate records. We use personal data only where necessary for these purposes and where our interests are not overridden by your interests, rights and freedoms.

We have carried out a legitimate interest and balancing assessment and consider that this processing is proportionate, has minimal privacy impact, and does not override your rights and freedoms.

DATA RETENTION

We keep personal data only for as long as necessary for the purposes for which it was collected, taking account of any legal or regulatory requirements. Retention periods, or the criteria used to set them, will depend on the activity concerned, but data will not be held beyond the necessary period.

RECIPIENTS OF THE DATA

Access to the personal data that we collect under this notice will be restricted to the relevant business and IT teams in Resonance for the purposes disclosed in this notice.

We may also share personal information collected under this privacy notice with contracted third-party service providers, including external auditors and professional advisers, where necessary for the purposes of due diligence, audit, regulatory compliance or related assurance activities. Such third-party access to personal information will be limited to what is necessary for these purposes and subject to appropriate confidentiality and data protection safeguards.

Unless required to do so by law we will not transfer your personal data to any other third parties except those listed above.

We may collect data using online form platforms provided by Cognito, Microsoft or other service providers acting on our behalf. Their privacy notices provide further information about their own processing.

YOUR RIGHTS

You, as the Data Subject, have certain rights under the GDPR and it is our duty as the Data Controller to ensure that you are informed of those rights.

- **The right to access** – You have the right to request a copy of the personal data we hold about you. This is known as a Subject Access Request. This is normally free of charge, although a reasonable fee may apply in limited circumstances.
- **The right to rectification** – You have the right to request that Resonance Ltd correct any information you believe is inaccurate. You also have the right to request Resonance Ltd to complete the information you believe is incomplete.
- **The right to erasure** – You have the right to request that Resonance Ltd erase your personal data, under certain conditions.
- **The right to restrict processing** – You have the right to request that Resonance Ltd restrict the processing of your personal data, under certain conditions.
- **The right to object to processing** – You have the right to object to our processing of your personal data in certain circumstances. You have an absolute right to object to processing for direct marketing.

- **The right not to be subject to automated decision making** – You have the right not to be subject to certain decisions based solely on automated processing, including profiling, which produce legal or similarly significant effects on you. This notice does not describe any such decision making.
- **The right to data portability** – You have the right to request that Resonance Ltd transfer the data that we have collected to another organization, or directly to you, under certain conditions.

If you make a request, we will normally respond within one month, although the law allows extensions in certain circumstances. If you would like to exercise any of these rights, please contact us using the details above.

COMPLAINTS – SUPERVISORY AUTHORITY

You have the right to lodge a complaint with the Information Commissioner's Office (ICO) at www.ico.org.uk if you are dissatisfied with how your personal data or rights have been handled.