

# PRIVACY POLICY

## Privacy Policy

This Privacy Policy was last changed July 2023

### 1 Who we are

We are Scottish Financial Enterprise and respect your privacy. This policy describes how we use your personal information.

Scottish Financial Enterprise (a company limited by guarantee, with company number SC100000 and having its registered office at 24 Melville Street, Edinburgh EH3 7NS) ("**we**") respects your privacy and values the trust you place in us when you share your personal information with us. This policy sets out how we, as data controller, collect and use your personal information, why we use it, with whom we share it, the rights to which you may be entitled and your choices about our use of your personal information.

This policy covers our use of your personal information arising from use of this website as well as subscribing to our email and event updates.

If you have any questions or need any further clarity please get in touch. Contact details are set out below.

### 2 Your information

#### **Data Collection and Usage**

We will collect and use your personal information to allow access to this website and to subscribe to our email and event updates and purposes set out in more detail in this section.

Your information may be shared with some third parties. Your information may be shared with certain third party service providers, for example, marketing platforms, (this is currently provided by MailChimp), and customer relationship management systems, (currently provided by Capsule). Your information may be stored with these providers to enable us to use their services. Your information may also be shared with an IT support company, currently Broadband Cloud Solutions Limited. Your information may be stored with this company to enable us to back up our data.

	<b>What we collect</b>	<b>How we use it</b>
<b>1</b>	Information when <b>you communicate with us</b> through our website including: <ul style="list-style-type: none"><li>Your contact details including your name, mobile telephone number, email address and occupation (this may include your social media account if that's the way you communicate with us);</li><li>The details of your communications with us;</li><li>The details of our messages to you.</li></ul>	We use this information, including to: <ul style="list-style-type: none"><li>Answer any issues or concerns;</li><li>Monitor customer communications for quality and training purposes.</li><li>Send you the information you have requested from us</li><li>Develop new services;</li><li>Improve our services;</li><li>Personalise our service;</li><li>Provide email updates and event updates if you subscribe to these services.</li></ul>
<b>2</b>	Information that we collect through <b>your use of our website</b> including: <ul style="list-style-type: none"><li>Device information such as</li></ul>	We use this information, including to: <ul style="list-style-type: none"><li>Provide our services;</li><li>Develop new services;</li></ul>

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	What we collect	How we use it
	<p>operating system, unique device identifiers, the mobile network system;</p> <ul style="list-style-type: none"> <li>• Hardware and browser settings;</li> <li>• Date and time of requests;</li> <li>• The requests you make;</li> <li>• The pages you visit and search engine terms you use;</li> <li>• IP address.</li> </ul>	<ul style="list-style-type: none"> <li>• Improve our services;</li> <li>• Identify issues with the website and user's experience of it;</li> <li>• Monitor the way our website is used.</li> </ul>
<b>3</b>	<p>Information that we collect incidentally from <b>other sources or public sources</b>, including:</p> <ul style="list-style-type: none"> <li>• Information available in the media;</li> <li>• Information presented on our social media timelines;</li> <li>• Information collected by security systems.</li> </ul>	<p>We use this information, including to:</p> <ul style="list-style-type: none"> <li>• Maintain market awareness;</li> <li>• Build and maintain social media branding;</li> <li>• Provide security to our sites.</li> </ul>

### Why we collect and how long we keep your information

We collect and use your information for a variety of reasons. We need some information to send you member updates and event invites.

Some information processing is required by law, or in the public interest such as making sure we verify our customers' identities.

Some information is processed because you've given your consent to that, which can be withdrawn via unsubscribe links in the email updates or by emailing [info@sfe.org.uk](mailto:info@sfe.org.uk).

Other information we collect because we have legitimate business interests, for example, in:

- Understanding how our customers use our products, services and websites;
- Understanding and responding to customer feedback;
- Researching and analysing the services our customers want;
- Improving our services;
- Understanding the type of products and services our customers buy and how they use them;
- Personalise our offers so we're better able to provide offers and ideas that are relevant to you;
- Maintaining a public profile on both traditional and social media;
- Providing security over our business and with whom we trade; or
- Developing and maintaining relationships with vendors, partners and other companies and dealing with individuals who work for them in our sector.

We will keep your information for as long as it is reasonably necessary. It will depend on factors such as whether you have recently contacted us. We will also routinely refresh our information to ensure we keep it up-to-date.

### Other uses

#### Legal requirements

Your personal information may also be processed if it is necessary on reasonable request by a law enforcement or regulatory authority, body or agency or in the defence of a legal claims. We will not

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delete personal information if relevant to an investigation or a dispute. It will continue to be stored until those issues are fully resolved.

### Information we share

There are certain circumstances where we may transfer your personal data to employees, contractors and to other parties.

- We may also share your information with certain contractors or service providers. They may process your personal data for us, for example, if we use a marketing agency or platform provider. Other recipients/service providers include advertising agencies, customer relationship management systems, IT specialists, database providers, backup and disaster recovery specialists, email providers or outsourced call centres.

Our suppliers and service providers will be required to meet our standards on processing information and security. The information we provide them, including your information, will only be provided in connection with the performance of their function.

- We may also share your information with certain third parties. We will do this either when we receive your consent or because we need them to see your information to provide products or services to you. These include credit reference agencies, anti-fraud databases, screening agencies and other partners we do business with.

Your personal information may be transferred to other third party organisations in certain scenarios:

- If we're discussing selling or transferring part or all of our business – the information may be transferred to prospective purchasers under suitable terms as to confidentiality;
- If we are reorganised or sold, information may be transferred to a buyer who can continue to provide services to you;
- If we're required to by law, or under any regulatory code or practice we follow, or if we are asked by any public or regulatory authority – for example the Police;
- If we are defending a legal claim your information may be transferred as required in connection with defending such claim.

Your personal data may be shared if it is made anonymous and aggregated, as in such circumstances the information will cease to be personal data.

### Where your information will be held

When we share your information your information may be transferred outside the European Economic Area. We store our information on cloud servers located in the UK.

We will only transfer data to jurisdictions outside the scope of the European General Data Protection Regulation (GDPR) where the appropriate safeguards set out in the GDPR are in place.

## 3 Your rights

### *Data Subject Rights*

We've listed the rights you have over your information and how you can use them below.

These rights will only apply in certain circumstances. They will generally not be available if there are outstanding contracts between us, if we are required by law to keep the information or if the information is relevant to a legal dispute.

- You can remove consent, where you have provided it, at any time.

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- You can ask us to confirm if we are processing your information.
- You can ask for access to your information.
- You can ask to correct your information if it's wrong.
- You can ask us to delete your information.
- You have a right to be forgotten and you can ask that our systems stop using your information.
- You can ask us to restrict how we use your information.
- You can ask us to help you move your information to other companies.  
To help with that, you have a right to ask that we provide your information in an easily readable format to another company.
- You can ask us to stop using your personal information, but only in certain cases.
- You have the right to complain to the relevant supervisory authority.

### How to contact us

If you have any questions about this policy please contact our Data Protection Officer: by email at [djones@sfe.org.uk](mailto:djones@sfe.org.uk), or by telephone at 0131 247 7700 or by letter at 24 Melville Street, Edinburgh EH3 7NS.

### Changes to the policy

This policy will be changed from time to time.

If we change anything important about this policy (the information we collect, how we use it or why) we will highlight those changes at the top of the policy and provide a prominent link to it for a reasonable length of time following the change.

If you would like to access previous versions of this policy please email the Data Protection Officer, at the following email address: [djones@sfe.org.uk](mailto:djones@sfe.org.uk).

### Other policies

#### Cookies

We use cookies that identify your browser or device. They collect and store information when you visit our website about how you use it.

We use cookies for the following purposes:

Type of Cookie	Purpose of Cookie
Strictly necessary	These cookies are essential for you to browse our website and use its features. The information collected relates to the operation of the website (e.g. website scripting language and security tokens) and enables us to provide you with the service you have requested.
Functionality	These cookies remember the choices you have made, for example the country you visit our website from, your language and any changes you have made to text size and other parts of the web pages that you can customise to improve your user experience and to make your visits more tailored and enjoyable. The information these cookies collect may be anonymised and cannot be used to track your browsing activity on other websites.
Performance/analytics	These cookies collect information on how users use our Website, for example which pages you visit most often, whether

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	<p>you receive any error messages and how you arrived at our website. Information collected by these cookies is used only to improve your use of our Website. These cookies are sometimes placed by third party providers of web traffic and analysis services. We use Google Analytics. For information on how Google processes and collects your information and how you can opt out, please click <a href="#">here</a>.<sup>1</sup></p>
Targeting or advertising	<p>These cookies collect information about your browsing habits and inferred interests to make advertising more relevant to you. They are also used to limit the number of times you see an advert as well as to measure the effectiveness of an advertising campaign. These cookies are usually placed by third party advertising networks. They remember the other websites you visit and this information is shared with third party organisations, for example advertisers.</p>
Social Media	<p>These cookies allow users to share our website content on social media such as Facebook and Twitter. These cookies are not within our control. Please refer to the respective privacy policies of the social media providers for how their cookies work.</p>

We may also automatically collect and store certain information about your interaction with our Website or app including IP address, browser type, internet service provider, referring/exit pages, operating system, date/time stamps and related data.

### Security

We are committed to keeping your personal information safe. We've got physical, technical and administrative measures in place to prevent unauthorised access or use of your information.