

Enterprise ForLife Ltd. Privacy Policy

Last updated: 28th April 2021

Introduction

Enterprise ForLife Ltd. and subsidiary companies ('The Company') respects your privacy and is committed to protecting your personal data. This privacy policy will inform you as to how we look after your personal data and tell you about your privacy rights and how the law protects you.

This is the standard privacy policy that applies to the following Enterprise ForLife Ltd. (EFL) group of companies, which includes:

- X-Forces (XF) CIC (a social enterprise and community interest company limited by shares), trading as X-Forces Enterprise (XFE) and Soldiering On Awards (SOA)
- X-Emergency Services CIC (a social enterprise and community interest company limited by shares), trading as XES and ESCT
- Soldiering On Foundation (a social enterprise and community interest company limited by guarantee)

When we use 'EFL', 'XES', 'X-Forces Enterprise', 'XFE', 'we', 'our', or 'us' in this privacy policy, we are referring to the relevant company in the EFL Group responsible for processing your data. When you engage with us regarding a product or service, or enter into a working relationship with us, we will tell you which EFL Group company you are dealing with.

What is the purpose of this document?

This privacy policy describes how we collect and process your personal data during and after your working relationship with us, in accordance with the General Data Protection Regulation (GDPR) and associated data protection legislation.

It is important that you read this privacy policy together with any other privacy policy or fair processing notice 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 privacy policy supplements the other policies and notices and is not intended to override them.

Data protection principles

We will comply with data protection law. This says that the personal information we hold about you must be:

1. Used lawfully, fairly and in a transparent way.

2. Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes.
3. Relevant to the purposes we have told you about and limited only to those purposes.
4. Accurate and kept up to date.
5. Kept only as long as necessary for the purposes we have told you about.
6. Kept securely.

The data we collect about you

Personal data means any information relating to an identified or identifiable individual. It does not include data where the identity has been removed (anonymous data).

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

- **Identity Data** includes, but is not limited to, first name and last name.
- **Personal data** includes, but is not limited to, date of birth, gender, service history and number, qualifications, ethnicity, medical history
- **Contact Data** includes address (personal and/or business), email addresses and telephone numbers.
- **Financial Data** includes, but is not limited to, your bank details, your credit history, your employment records, your income, your commitments and your assets.
- **Transaction Data** includes details of products and services you have purchased from us.
- **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.
- **Profile Data** includes your username and password, purchases or orders made by you.
- **Usage Data** includes information about how you use our website, products and services, such as the events you have attended.
- **Marketing and Communications Data** includes your preferences in receiving marketing from us and our third parties and your communication preferences.

We may also collect, use and share Aggregated Data such as statistical or demographic data for any purpose. Aggregated Data may be derived from your personal data but is not considered personal data in law as this data does not directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect Aggregated Data with your personal data so that

it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy notice.

Where we need to collect personal data by law, or under the terms of a contract we have with you or with Start-Up Loans Company (SULCo) for the purposes of supporting you with a loan application and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with services). In this case, we may have to cancel a service you have with us, but we will notify you if this is the case at the time.

How is your personal data collected?

We use different methods to collect data from and about you, including through:

- **Direct interactions.** You may give us your personal data by filling in forms (online or on paper), corresponding with us by post, phone, email or otherwise, or using our products and services. This includes personal data you provide when you:
 - Enquire about products and services;
 - Sign-up to or use our products and services;
 - Subscribe to our service or publications;
 - Request marketing to be sent to you;
 - Enter a competition, promotion or survey; or
 - Give us some feedback.
- **Third party interactions.** We may receive your information from a third party, for example where you have applied for a loan through The Start Up Loans Company (SULCo) or registered for an event via Eventbrite. We will always ensure that the data has been collected and shared with us in accordance with our legal obligations.
- **Automated technologies or interactions.** As you use our website, products and services, we may automatically collect personal data by using cookies, server logs and other similar technologies. Please see our [cookie policy](#) for further details, including information about the cookies we use. You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly.

How we will use your personal data

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

1. If you have applied for a Start Up Loan, to assess your eligibility, including assessing lending risks and obtaining a credit reference.
2. Where we need to comply with a legal or regulatory obligation.

3. Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
4. Certain types of personal information, such as gender and ethnicity, are used only as part of our contractual reporting requirements, for the purposes of monitoring and promoting equal opportunities.

Generally, we do not rely on consent as a legal basis for processing your personal data.

We have set out below, in a table format, a description of all the ways we plan to use 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.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To register you as a new customer	(a) Identity (b) Contact	Performance of a contract with you
To process and deliver your order	(a) Identity (b) Contact (c) Marketing and Communications	Performance of a contract with you
To process and deliver a service on behalf of a third party (e.g. public body or regulatory body):	(a) Identity (b) Contact (c) Profile	(a) Necessary for the performance of a task carried out in the public interest or in the exercise of official authority (b) Necessary for our legitimate interests (providing our business services)
To manage our relationship with you which will include: (a) Notifying you about changes to our terms or privacy policy	(a) Identity (b) Contact (c) Profile (d) Marketing and Communications	(a) Performance of a contract with you (b) Necessary to comply with a legal obligation

(b) Asking you to leave a review or take a survey

(c) Necessary for our legitimate interests (to keep our records updated and to study how customers use our products/services)

To enable you to partake in a prize draw, competition or complete a survey

(a) Identity
(b) Contact
(c) Profile
(d) Usage
(e) Marketing and Communication

(a) Performance of a contract with you
(b) Necessary for our legitimate interests (to study how customers use our products/services, to develop them and grow our business)

To administer and protect our business and our website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)

(a) Identity
(b) Contact
(c) Technical

(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise)
(b) Necessary to comply with a legal obligation

To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you

(a) Identity
(b) Contact
(c) Profile
(d) Usage
(e) Marketing and Communications
(f) Technical

Necessary for our legitimate interests (to study how customers use our products/services, to develop them, to grow our business and to inform our marketing strategy)

To use data analytics to improve our website, products/services, marketing, customer relationships and experiences

(a) Technical
(b) Usage

Necessary for our legitimate interests (to define types of customers for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)

To make suggestions and recommendations to you about goods or services that may be of interest to you (marketing)	(a) Identity (b) Contact (c) Technical (d) Usage (e) Profile	Necessary for our legitimate interests (to develop our products/services and grow our business)
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We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

Disclosures of your personal data

We may share your personal data with the parties set out below for the purposes set out in the table above.

- Other members of the Enterprise ForLife Ltd. group of companies as specified earlier.
- External Third Parties, such as:
 - Regulators, who regulate our products and services.
 - Public authorities or regulatory bodies who have contracted us to provide a service.
 - Partner charities and organisations who have provided the funding for our workshops and events.
 - Tax authorities, regulators and other authorities who require reporting of processing activities in certain circumstances.
 - Subcontractors, who we may wish to use to support us in providing our services.
 - The Start-Up Loans Company and The Enterprise Fund Limited t/a GC Business Finance (GCBF), where you have applied for a loan.
 - Mentors who provide guidance in relation to the services you may receive from us.
 - Hosting services, such as those providing the platform for our online products and services.
 - Customer feedback providers for customer feedback and satisfaction surveys.
 - Professional advisers including lawyers, bankers, auditors and insurers who provide banking, legal, insurance and accounting services.

- Third parties to whom we may merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy policy.
- Our website 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.

International transfers

Given that the Internet is a global environment, using it to collect and process personal data necessarily involves the transmission of data on an international basis. This means for instance that data you pass to us may be processed outside the European Economic Area, although the data will always be held securely and we will take steps to ensure they provide an adequate level of protection in accordance with the UK's Data Protection Act. By submitting your personal information you agree to this transfer, storing or processing at a location outside the EEA.

Data security

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.

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.

Data retention

We will only retain your personal information for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, regulatory, or reporting requirements. To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

Your legal rights

Under certain circumstances, by law you have rights under data protection laws in relation to your personal data, as follows:

- **Request access** to your personal data (commonly known as a “data 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.
- **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.
- **Request erasure** of your personal data. 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 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.
- **Object to processing** of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.
- **Object to direct marketing.** You also have the right to object where we are processing your personal data for direct marketing purposes. You can ask us to stop sending you marketing messages at any time by following the opt out links on any marketing message sent to you or by contacting us at any time. Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us as a result of a service purchase, service experience or other transactions.
- **Request the restriction of processing** of your personal data. This enables you to ask us to suspend the processing of personal data in the following scenarios: (a) if you want us to establish the data’s accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) 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 (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.
- **Request the transfer** of your personal data to you or a third party. We will provide you, or a third party you have chosen, with 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.
- **Withdraw your consent** to the processing. In the limited circumstances where you may have provided your consent to the collection, processing and transfer of your personal data for a specific purpose, you have the right to

withdraw your consent for that specific processing at any time. To withdraw your consent, please contact dataprotection@x-forces.com. Once we have received notification that you have withdrawn your consent, we will no longer process your personal data for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law.

If you want to review, verify, correct or request erasure of your personal data, object to the processing of your personal data, or request that we transfer a copy of your personal data to another party, please contact dataprotection@x-forces.com. You have the right to make a complaint at any time to your local data protection authority as set out below. We would, however, appreciate the chance to deal with your concerns before you approach your data protection authority so please contact us in the first instance.

Changes to this privacy policy

We keep our privacy policy under regular review. The date that this privacy policy was last updated can be found at the top of the document. If we decide to change our privacy policy, we will update all the relevant documentation and post the updated version on our website. We may also notify you by email if we hold that information.

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.

Contact details

If you have any questions or comments regarding how we handle your personal data, please contact us at:

Email: dataprotection@x-forces.com

Post: Enterprise ForLife Ltd, Mountbarrow House, 6-20 Elizabeth Street, London, SW1W 9RB

Data Protection Regulator

Further information and advice about data protection is available from:

The Office of the Information Commissioner
Wycliffe House
Water Lane
Wilmslow
Cheshire SK9 5AF

Tel: +44 (0) 01625 545 745

Website: www.ico.org.uk

