

## Our Privacy Policy

### Social Value Portal

May 2018

#### Full Privacy Policy

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### Introduction

This Privacy Policy applies to the Social Value Portal service (the “**Service**”). This document outlines the type of personal data we collect from users of the Service (“**Users**” or “**you**”) in connection with the Service and how this data is protected, used and maintained.

The Service is operated by Social Value Portal Ltd, a company registered in England & Wales, with company number 09197997 whose registered address is at 20-22 Wenlock Road, London, England, N1 7GU (“**Company**” also referred to in this Privacy Policy as “**we**”).

Commitment to the protection and security of personal information is of paramount importance to us.

### Scope

The purpose of this Policy is to inform you about our privacy practices and to ensure that you understand the purposes for which we collect and process your personal data. The following is a brief summary of our privacy practices.

This Policy does not apply to any data insofar as it is held, processed, disclosed or published in a form which cannot be linked to a living individual (such as anonymised data, aggregated data, or coded data which, in a given form, cannot effectively be used to extract your personal data) ("**Anonymised and Aggregated Data**"). We reserve the right to generate Anonymised and Aggregated Data extracted out of any databases containing your personal data and to make such use as we see fit of any such Anonymised and Aggregated Data.

### **Who is responsible for processing your personal data?**

The Company is responsible for the processing of your personal data insofar as we collect it as part of the Service including personal data we obtain through registration forms or other communications with you, the data we receive from Users for analysis and the reports that we generate through the Service and send to our Users and data we collect by tracking Users' use of the Service.

### **Questions and complaints**

If you have any questions or wish to make any complaint in relation to our use of your data, please contact us through the email address provided at the end of this Policy. The postal address and other contact details of the Company are available on the Service. Enquiries relating to our use of your personal data should be made for the attention of Peter Armitage, at: [peter.armitage@socialvalueportal.com](mailto:peter.armitage@socialvalueportal.com).

### **The type of information we collect and how we collect data**

*Account information:* Information about your account can be found on our Terms and Conditions. To use our Services, you must create an account. To create an account, you are asked to submit details such as name, email address and telephone number, date of birth, a password you create.

*Information given by Users:* this includes information that we may ask Users to provide from time to time for research processes, quality control and to improve the Service. For example, we may collect such information through direct correspondence, forms, surveys, other activities through the website etc.

*Device and Browsing Information:* From time to time, we may use automatic data collection technologies to collect data for research, development and statistical purposes. This data includes but is not limited to data regarding the products that were recommended to you, products that you chose to purchase, other aspects of your use of our website or other aspects of the Service. We may monitor browsing actions or usage patterns by Users, such as external sites you visit just before or after using our Services and information about your internet connection or device ID, such as your operating system or IP address.

### **How we use your data**

We collect and process Users' personal data for the following purposes:

- to meet our obligations to you, to provide you with access to the Service and with product recommendations and to deliver the Service to you, to support Users' use of the Service and to

- enable us to handle enquiries and complaints;
- to manage your account and from time to time to communicate with you including by sending you promotional offers or other marketing information or to invite you to participate in surveys, questionnaires or research projects. You can opt out of promotional communications through our Services;
  - for research and development purposes in order to improve or personalise the Service and to help us understand our customers and how our Services are used;
  - to aggregate data and to anonymise or depersonalise data to allow it to be used for statistical and research purposes;
  - to personalise Users' access to the Service, to test, monitor, improve and upgrade the Service;
  - to meet our legal obligations and the regulatory requirements to which we are subject, for loss prevention purposes and to protect and enforce our rights and meet our obligations to third parties;
  - for our internal business purposes such as keeping records of our communications with Users, compiling statistical data concerning the use of the Service and performing analytics relating to the use of the Service by Users.

### **The lawful basis for processing users' personal data**

The processing of your Personal Data is lawful on the basis of the following:

- your express consent, where you consent for us to process your data for the purpose of receiving the Service;
- the fulfilment of our contractual obligations to you in accordance with our subscription terms & conditions;
- our legitimate interests in (among other things) operating and administering the Service, conducting commercial research, improving and maintaining our Service, personalising and tailoring content made available to you through the Service, protecting the security or integrity of our databases or the Service, protecting our business or reputation, taking precautions against legal liability, protecting and defending our rights or property, or for resolving disputes, investigating and attending to inquiries or complaints with respect to your use of the Service.

### **When do we disclose your personal data to third parties?**

We may share your personal data with our subsidiaries, parent companies and other affiliates, our subcontractors, service providers, representatives and agents that provide services to us or act for or on our behalf ("**Related Parties**"). Personal data is shared with Related Parties only for the purpose of delivering the Service to Users, maintaining and improving the Service and related purposes.

We ensure that such Related Parties do not use your personal data for any other purposes, that they do not disclose it to any other third parties and that they do not retain copies of your personal data except as necessary to provide services to us or to our Users or as may be required by law. We require Related Parties to protect personal data of our Users that is received from us from unauthorised access, corruption or loss.

Examples of cases where personal data may be shared with Related Parties are set out below:

- Related Parties that we use to assist us in delivering the Service (including administration services, technical services relating to the maintenance, servicing and upgrading of the Service hosting and cloud computing services, data migration and analytical services, marketing and customer service, payment processing services, and other outsourced services);
- Related Parties that help us to test, monitor, improve and develop the Service;
- Related Parties that help us compile, aggregate and analyse personal data in order to produce Anonymised and Aggregated Data that we use, sell and publish;
- Related Parties that help us perform analytical studies and research. We will not disclose the results of such analysis or research to third parties or publish it except in the form of Anonymised and Aggregated Data.

We also reserve the right to disclose and transfer your personal data to other entities in connection with the sale or transfer of our business or those business activities relating to the Service. We will ensure that such acquirer will continue to process the personal data in accordance with this Policy (as it may be updated from time to time).

Other circumstances in which your personal data may be used or disclosed include the following:

- if we believe that such disclosure is reasonably necessary to enforce or apply our terms and conditions or to protect our rights, property, the safety or integrity of our services, software or products;
- to protect the Service against abuse or unauthorised access and to protect the personal data of our Users in general;
- where necessary to satisfy a legitimate request or order of a government body, public authority, regulator or enforcement agency, in response to a third-party subpoena (if on legal advice such response is required) or otherwise as provided by law or required by any court of competent jurisdiction or any regulatory authority acting under statutory powers; or if necessary to defend us or our subscribers (for example, in a lawsuit).

We will fully co-operate with regulators, law enforcement agencies and other authorities to identify anyone who uses our products, service or software for illegal activities. We reserve the right to report to regulators and law enforcement agencies any activities that are believed to be unlawful.

### **Transfer of personal data across borders**

We operate the Service from the United Kingdom. We may use servers and cloud services to store and process data in other countries and may transfer the data to other countries for the purpose of storage and data management. Our Related Parties may have access to your personal data in different countries including, without limitation, the UK, the EU and the USA. We ensure that when personal data is transferred across borders, we do so in compliance with the law including (in the case of data exported from the EU) by putting in place, as between us and the party receiving the data, contractual terms for the protection of the interests of data subjects in the form approved by the European Commission.

### **How do we protect your personal data?**

We use a range of technical and organisational measures to protect your personal data including the following:

- we only collect and maintain personal data insofar as is necessary for the proper functioning of the Service;
- we limit and control access to records of personal data to members of staff and Related Parties that require such access to perform their duties and services, through passwords, variable log-in rights and other technical and organisational access controls;
- we apply security measures (including as part of the cloud services we use and when using the services of Related Parties to process your data) including encryption, firewalls and physical security for our servers and information centres.
- we ensure confidentiality obligations are put in place when dealing with our Related Parties and other third parties;
- we avoid the collection or storage of personal data when it is unnecessary or for longer than reasonably needed or legally permitted or required and erase it (or anonymise it) once we no longer need it or are no longer required to keep it as personal data;
- User's account details are held in our records for as long as the account is maintained. The data is erased when the account is closed down;
- data collected from monitoring Users' use of the Service is aggregated and anonymised before we share it with third parties.

We cannot guarantee that these protections will always successfully prevent unauthorised access to, corruption or loss of personal data. Please bear in mind that transmissions over the Internet are not completely secure, and information you send to or from this Service may be accessible by others. More specifically, electronic communications sent to or from the Service may not be secure.

We ask that you do not share your account password or log-in credentials with anyone. Please contact Peter Armitage ([peter.armitage@socialvalueportal.com](mailto:peter.armitage@socialvalueportal.com)) immediately if you suspect unauthorised use of your account.

### **How to access, edit or delete your information**

You can contact our **Support Help Desk** ([support@socialvalueportal.com](mailto:support@socialvalueportal.com)) to request access to, edit or delete any personal information you have provided to us. We cannot guarantee we will be able to grant a request to change information, for example, if we believe granting such a request would violate the law or cause the information to be incorrect. It may not be possible to retrieve, remove or correct data from any database where the data had been de-identified and/or aggregated.

### **Account closure**

You can close Your Account by getting in touch with our **Support Help Desk** ([support@socialvalueportal.com](mailto:support@socialvalueportal.com)). If you choose to close Your Account, we will remove your registration information and associated user information from the site.

### **Cookies and tracking devices**

A cookie is a small text file that is downloaded to your browsing device (such as your smartphone or your computer) when you visit a website. We use cookies to help provide Users with a personalised experience when using our Service, to analyse the effectiveness and usefulness of the Service and to avoid the need to log-in each time you access the website or the Service. We make use of anonymous cookies for research and development purposes such as user analysis and profiling which are carried out on an anonymous basis.

Further information on the use of cookies and tracking devices is provided in the cookies notification section of our Privacy Policy page (<http://socialvalueportal.com/privacy-policy/>).

## Your legal rights

Users have the following legal rights in respect of their Personal Data:

1. The right to require us to advise you of the categories of your personal data that we process, the purpose of any such processing, the identity of third parties who receive your data from us, the period for which your personal data is stored and whether any automated decision-making processes are being used in relation to your personal data. You also have the right to ask for a copy of your personal data records;
2. The right to require us to rectify inaccurate personal data records;
3. The right to request the erasure of your personal data records. You have the right to require us to erase your personal data records where:
  - a. the data is no longer necessary in relation to the purpose for which it was collected, such as where you choose to close your account (in which case, it is our policy to delete your data even without your request);
  - b. where the processing of the data is based on your consent and such consent is withdrawn (provided that the other circumstances described in the sections 'When do we disclose your personal data to third parties?' and 'Lawful basis for processing users' personal data' above no longer apply); or
  - c. you object to the processing of your data and there are no overriding legitimate grounds for justifying the data processing;
4. The right to restrict the processing of your personal data in certain circumstances (for example, where an objection has been raised and is being investigated); and
5. The right to object to the processing of your data in certain circumstances.

## Links to third party sites and social media services

This policy applies only to the processing of personal data by us in connection with the Services. It does not apply to any processing activities carried out by operators of website, social media services such as Twitter or Facebook or other third parties whose sites or services may be accessible via our Services. When you follow a link from the Service to any third party site or service you are being transferred to a website or online service operated by someone other than us. The operator of that website or service will have a different privacy policy. We do not share your personal data with these third party websites or services and we are not responsible for their individual privacy practices. We encourage you to investigate the privacy policies of any such third party sites or services.

## Privacy Policy changes

This Policy was last changed in May 2018. If we make changes to the Policy, the new version will be posted on the Service. We may change, modify, add or remove portions of this Policy at any time, and any changes will become effective immediately upon being posted unless stated otherwise.