



# **Big Issue Invest Privacy Notice**

For Power Up London

<b>Version History</b>				
Version	Approved by	Revision Date	Description of Change	Author
<b>1.0</b>	<b>Nedelin Nedyalkov</b>	<b>09/2023</b>	<b>Reviewed and updated</b>	<b>Gretel Dixon</b>
<b>1.1</b>	<b>Nedelin Nedyalkov</b>	<b>02/2024</b>	<b>Updated</b>	<b>Carolina Cirillo</b>

## 1. Who we are and the scope of this privacy notice

This is a privacy policy notice of Big Issue Invest Ltd (BII), a private company limited by shares registered in England with company number 04764982 whose registered office is 113-115 Fonthill Road, Finsbury Park, London N4 3HH.

Big Issue Invest is part of The Big Issue Group (TBIG). Alongside Big Issue Invest, TBIG consists of the following registered companies: Big Issue Invest (company registration number 04764982), The Big Issue Company (company registration number 02612480) and The Big Issue Changing Lives, a Community Interest Company (CIC) (company registration number 14786850). Some of the group’s other services and online sites have their own policies that will be relevant to you when you are using those sites and services.

This privacy policy notice governs the use of personal data collected, received, used, shared, transferred and processed as part of BII’s role in the delivery of the Power Up London (“PUL”) programme to deliver financial and non-financial support to social enterprises in Greater London.

It explains how we process any personal data that we receive or collect about you, including information that you give to us, in relation to PUL. It also tells you our views and practices about your personal data and how we will treat it.

For the purposes of applicable data protection legislation, Big Issue Invest is the controller of the personal data you provide through the PUL application form. Personal data is collected for the purpose of evaluating any PUL applicants and ongoing relationship management.

Personal data is any information about you which you can be identified or identifiable. We only collect your personal data in line with applicable laws. It is BII's responsibility to comply with data protection laws with respect to any personal data it controls or processes in relation to PUL.

## 2. How to contact us

Should you have any questions about how personal data is used by BII, in the first instance, please contact Carolina Cirillo at [carolina.cirillo@bigissue.com](mailto:carolina.cirillo@bigissue.com) stating it is a query about PUL Data Protection.

The joint data privacy policy of The Big Issue Group is available for your reference here: <https://www.bigissue.com/privacy-policy/>.

For information about the use of Cookies on The Big Issue Group's website, please see: <https://www.bigissue.com/cookie-policy/>.

## 3. What data we collect

Personal data collected through the PUL application form will principally be the name, year of birth and contact details, including an address, email, telephone number and role description, of accelerator and grant applicants.

We also ask for equal opportunities monitoring information about the leadership of your organisation and will collect this data where provided, consistently with the provisions of the Data Protection Act 2018 for collecting personal data for the promotion of equal of opportunity or treatment.

BII may also collect and use publicly available information about you to carry out background checks for the purposes of assessing any risks to public funding in making a grant to your organisation.

If your application is approved for a PUL grant award, BII will request additional personal data as part of our due diligence process with the purpose of performance of a contract with your organisation. This data will include the full name, year of birth, gender, and contact details, including an address, email, telephone number and role description of one or more legal signatories of your organisation and/or individuals with the authorisation to make payments from the bank account used by your organisation to receive and manage the PUL grant.

### 1.1. How will personal data be collected

The personal data governed by this policy will originate from:

- the PUL application form which you submit to request a place on the PUL accelerator and supplement to request PUL grant funding;

- BII may also collect and use publicly available information about you and your organisation;
- If your application is approved for an PUL grant award, BII will use contact details provided by you as part of the PUL application process to request additional personal data directly via email or online forms;
- Additional data concerning the way you use your PUL award will be collected by BII as part of managing grant payments, grant variations, grant monitoring and grant reporting relating to your grant award.

## 1.2. How we will use your personal data

Your personal data will be used by us for the following purposes:

- Administering your accelerator and grant applications, including assessing your applications, and undertaking due diligence and identity checks;
- Assessing any risks to public funding in making a grant to your organisation;
- Communicating with you regarding the application, your project's progress, grant management and any other relevant information relating to PUL;
- Providing the UK Government with statistical information in relation to grant applications and awards, including such personal data as they require in connection with the running of PUL;
- Evaluation of the PUL programme;
- Analysis and learning about grant-making and the role of social enterprises (on an anonymous or pseudonymous basis wherever possible);
- Complying with our legal and regulatory requirements; and
- To provide you with details of other services provided by BII and the UK Government, including through marketing communications.

## 4. Sharing your personal data

In general, once received by BII your data is processed by us, we do not pass personal data provided by applicants to third parties unless in the context of managing grant applications and grant awards. Where we do share your personal data, we do so with the following recipients and categories of recipients:

### 2.1. The Greater London Authority

Power Up London is delivered by Big Issue Invest with funding from the Greater London Authority (GLA) allocation of the UK Shared Prosperity Fund (UKSPF), a central pillar of the UK government's Levelling Up agenda to invest in communities and support local businesses.

Data linked to your application and award collected by BII may be shared with the GLA, for the purposes of monitoring, reporting and evaluation, in anonymised or aggregated form where possible.

Please refer to the Greater London Authority privacy policy available on:

<https://www.london.gov.uk/who-we-are/governance-and-spending/privacy-policies/gla-privacy-policy> regarding the details of their processing of personal data.

BII may also hold data from previous contact with an applicant. Where this is personal data, this information will only be shared with the GLA where such sharing would be in compliance with Data Protection Legislation.

## **2.2. Service providers**

BII may share personal data with third parties that help them run PUL, for example by conducting organisational checks and verifications for due diligence, with external assessors or programme evaluators, or others who may have a legitimate interest in our work for the purposes of this programme. BII will ensure that any persons authorised to access personal data provided by you have committed themselves to confidentiality or are under an appropriate statutory obligation of confidentiality. We will only share your data with any service providers where we have an appropriate data processing agreement (or similar protections) in place, and they will not be able to use your data for their own purposes (e.g. for their own marketing purposes).

Your personal data may be shared with fraud prevention agencies for the purpose of determining, preventing or detecting crime, or for safeguarding purposes, who will use it to prevent fraud and money laundering and to verify your identity.

## **2.3. Agencies and authorities if required by law**

We may disclose your personal data to any law enforcement agency, court, regulator, government authority, or in connection with any legal action if we are required to do so to meet a legal or regulatory obligation, where the request is proportionate, or otherwise to protect our rights or the rights of anyone else (for example, in response to valid and properly served legal process such as a warrant). We will attempt to notify you prior to disclosing your data unless (i) prohibited by applicable law from doing so, or (ii) there are clear indications of unlawful conduct in connection with your use of BII services.

We may also disclose your personal data:

- to data protection regulatory authorities;
- in response to an enquiry from a government agency; and
- to other regulatory authorities with jurisdiction over our activities.

We will only share personal data which they need to carry out their work and subject to appropriate security measures.

## **2.4. Related Entities**

We may share your personal data with any current or future member of TBIG, which includes our subsidiaries, any relevant ultimate holding company and its subsidiaries.

## 2.5. Professional advisors and auditors

We may disclose your personal data to professional advisors (such as legal advisors and accountants) or auditors for the purpose of providing professional services to us.

## 2.6. Replacement providers

We may also share your personal information in the following circumstances:

- if BII sells or buys any business or assets, BII may transfer your personal information to the potential seller or buyer of such business or assets; and
- if BII or substantially all of its assets are acquired by a third party, its rights to personal data held by it may be one of the transferred assets.

Otherwise, your data will only be disclosed or shared in special exceptional cases, where we are obligated or entitled to do so by statute or upon binding order from a public authority.

## 5. Lawful basis for processing your personal data

We rely on the legitimate interest basis to collect and use personal data about PUL applicants and grantees. We believe we have a number of legitimate interests in processing your personal data, including but not limited to:

- administering accelerator and grant applications;
- promoting the programme to suitable applicants;
- helping us meet our legal obligations; and
- analysing and learning from the information you provide to better administer accelerators and grants in the future.

Sensitive personal data such as ethnicity will be collected for the purposes of equal opportunities monitoring and used in assessment. Where we collect information for the purpose of promoting equal opportunity or treatment we rely on substantial public interest, as further described in paragraph 8 of Schedule 1 to the Data Protection Act 2018.

If your application is approved for a PUL grant award, BII will request additional personal data as part of our due diligence process with the purpose of performance of a contract with your organisation.

Where you have provided us with consent to use your personal data, you can withdraw this at any time.

## 6. How long will we keep your personal data?

Your personal data will be retained by BII for six years. We may contact you to ask for your consent to retain your personal data for a longer period, in which case we will provide you with an updated privacy notice at the time detailing how we may use your personal data going forwards.

## 7. Accuracy

BII will take all reasonable steps to keep personal data accurate, complete, current and relevant, if it is used on an ongoing basis and based on the most recent information available to us. If we are advised of a change in information, we will update the data accordingly. Please notify us of any changes to your personal data.

## 8. Security of personal information

BII is committed to taking all reasonable and appropriate steps to protect the personal data we collect from you from against improper use or disclosure, unauthorised access, unauthorised modification, and unlawful destruction or accidental loss and against all other unlawful forms of processing. We have taken and will take appropriate information security, technical, storage and organisational measures to such end, including measures to deal with any suspected data breach. All service providers who are involved with the processing of your information are also obliged to respect the confidentiality of your personal data. We protect your personal data by storing it securely and ensuring only certain personnel with password protected authentication can access personal data.

Unfortunately, there is always risk involved in sending information through any channel over the internet. You send information over the internet entirely at your own risk. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted over the internet and we do not warrant the security of any information, including personal data, which you transmit to us over the internet.

If you suspect any misuse, loss, or unauthorised access to your personal data please let us know immediately using the contact details set out in this privacy notice. We will investigate the matter and update you as soon as possible on next steps.

## 9. Where we transfer your personal data

The personal data that we collect from you may be transferred to, processed and stored at a destination outside the European Economic Area (which means the 28 European Union member states, together with Norway, Iceland and Liechtenstein, "EEA"), including by our third-party service providers. Your information may also be processed by staff operating outside the EEA who work for us or for one of our service providers.

In the event that your personal data is transferred to, or stored in a country outside of the EEA, and where the country or territory in question does not maintain adequate data protection standards, we will take all reasonable steps to ensure that any such transfers are undertaken in accordance with applicable data protection and privacy laws and that your data is treated securely and in accordance with this privacy notice.

However, please note that where personal data is stored in another country, it may be accessible to law enforcement agencies in accordance with domestic laws.

## 10. Your rights

You have various rights in relation to the data which we hold about you as described below.

To get in touch with us about any of your rights under applicable data protection laws, please use the contact details set out above. We will seek to deal with your request without undue delay, and in any event within any time limits provided for in applicable data protection law (subject to any extensions to which we are lawfully entitled). Please note that we may keep a record of your communications to help us resolve any issues which you raise. We may need to request specific information from you to help us confirm your identity.

### 10.1. Right to be informed

You have the right to be informed about how we collect and use your personal data.

### 10.2. Right to access your information

You have the right to request a copy of the information that we hold about you. If you would like a copy of some or all of your personal information, please let us know. If we provide you with access to the information we hold about you, we will not charge you for this unless permitted by law. If you request further copies of this information from us, we may charge you a reasonable administrative cost. Where we are legally permitted to do so, we may refuse your request. If we refuse your request, we will always tell you the reasons for doing so.

### 10.3. Right to rectification

You have the right to request that we rectify any inaccurate or incomplete personal data that we hold about you. If we have shared this personal data with third parties, we will notify them about the rectification unless this is impossible or involves disproportionate effort. You may also request details of the third parties that we have disclosed the inaccurate or incomplete personal data to. Where we think that it is reasonable for us not to comply with your request, we will explain our reasons for this decision.

### 10.4. Right to erasure

You have the right to request that we "erase" your personal data in certain circumstances. Normally, this right exists where:

- the data is no longer necessary;
- you have withdrawn your consent to us using your data, and there is no other valid reason for us to continue;
- the data has been processed unlawfully;



- it is necessary for the data to be erased in order for us to comply with our obligations under law; or
- you object to the processing and we are unable to demonstrate overriding legitimate grounds for our continued processing.

We would only be entitled to refuse to comply with your request for erasure in limited circumstances and we will always tell you our reason for doing so. When complying with a valid request for the erasure of data we will take all reasonably practicable steps to delete the relevant data.

### **10.5. Right to restrict processing**

You have the right to request that we restrict our processing of your personal data in certain circumstances, for example if you dispute the accuracy of the personal data that we hold about you or you object to our processing of your personal data for our legitimate interests. If we have shared your personal data with third parties, we will notify them about the restricted processing unless this is impossible or involves disproportionate effort. We will, of course, notify you before lifting any restriction on processing your personal data.

### **10.6. Right to data portability**

This only applies to information you have given us. You have the right to get your personal data from us in a way that is accessible and machine-readable, for example as a csv file. You also have the right to ask us to transfer your data to another organisation. We must do this if the transfer is, as the regulation says, “technically feasible”.

The right only applies if we are processing information based on your consent or for the purpose of performing a contract with you.

### **10.7. Right to object**

This right enables you to object to us processing your personal data where we do so for one of the following reasons:

- because it is in our legitimate interests to do so;
- to enable us to perform a task in the public interest or exercise official authority;
- to send you direct marketing materials; or
- for scientific, historical, research, or statistical purposes.

## **11. How to complain**

You have the right to make a complaint to your local supervisory authority which is the Information Commissioner’s Office. You can contact them in the following ways:

- Phone: 0303 123 1113
- Email: [icocasework@ico.org.uk](mailto:icocasework@ico.org.uk)

- Post: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF

Please raise your concern with us first and we will do our best to help.

## **12. CHANGES TO THIS PRIVACY NOTICE**

Any changes we make to this privacy notice in the future will be posted on this page and we may email you to tell you about any significant changes. Please check back regularly to see any updates or changes.