

General Privacy notice, August 2025

1. Introduction

Under UK data protection law, individuals have a right to be informed about how Purposeful Ventures uses any personal data that we hold about them. We are committed to protecting your personal data and being transparent about how we use it. This Privacy Notice explains what personal data we collect, how we use it, the legal bases for processing, and your rights.

Purposeful Ventures, 1 EdCity, EdCity Walk, W12 7TF is the 'data controller' for the purposes of UK data protection law.

Our data protection lead is Aisha Washington, Chief Operating Officer.

2. The personal data we collect

We may collect and process the following categories of personal data, where relevant:

- Contact information (e.g. name, email address, phone number)
- Professional information (e.g. job title, organisation, areas of expertise)
- Information from public sources (e.g. Companies House, professional networks like LinkedIn, public social media content and media articles)
- Records of interactions with us (e.g. event attendance, email correspondence)
- Preferences and engagement history related to our services or initiatives
- Information provided to us via surveys or interviews, evaluations etc
- Background information (including but not limited to philanthropic and personal interests, family and partner details, current activities, relationships to other supporters)

3. Why we use this data

We process personal data for the following purposes:

- To manage and maintain relationships with stakeholders and partners including donor and supporters
- To deliver and improve our services, programmes, and events
- For business development and strategic planning
- To assess interest and capacity to support our work and carry out due diligence in line with our Ethical Fundraising and Acceptance of Donations Policy
- To measure our impact and improve performance
- To keep you informed about our work where you have opted in
- For administrative, legal, and compliance purposes

4. Our lawful basis for using this data

We rely on one or more of the following lawful bases under Article 6 of the UK GDPR:

- **Consent** where you have given clear consent for us to process your personal data for a specific purpose, e.g. using analytical cookies, using a photo of you for promotion or gaining your consent to send you information.
- Contract to fulfill a contract we have entered into you with, e.g. event bookings
- **Legitimate Interests** where the processing is necessary for our legitimate interests (e.g. business development, fundraising, marketing the charity, improving services, detecting fraud, stakeholder engagement,), provided those interests are not overridden by your rights and freedoms.
- **Legal Obligation** where we are required to process your data to comply with a legal obligation, e.g. claiming gift aid, filing trustee details with the Charity Commission, meeting

any statutory safeguarding duties or reporting suspected criminal activity to the relevant authorities and complying with GDPR legislation.

We only process personal data where there is a clear legal basis to do so. You may wish to refer to the ICO's guidance on the lawful basis for processing.

5. International Data Transfers

Your personal data may be transferred to and processed in countries outside the UK and the European Economic Area (EEA). Where this occurs, we ensure that appropriate safeguards are in place, such as:

- Transfers to countries deemed to have an adequate level of data protection by the UK Government or European Commission
- Standard contractual clauses approved by the UK Information Commissioner or European Commission

6. Sharing data with third parties

We do not disclose any information you provide to any third parties, other than as follows:

- Where you have agreed to share any of your information with any other user of our services or third party
- Where we run a joint event or programme with another organisation (only sharing personal information that is necessary)
- Where we may engage third party companies or individuals, such as payment processors, mailing houses etc, to process information on our behalf
- Where information such as email addresses is passed to organisations who provide us with technical support
- If we are under a duty to disclose or share your personal information in order to comply with any legal obligation (for example, if required to do so by a court order or for the purposes of prevention of fraud or other crime)
- We may transfer your personal information to a third party if we merge or restructure
- To protect our rights, property and safety, or the rights, property and safety of our users or any other third parties. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

Where we do supply your personal information to a third party we will take steps to ensure that your privacy rights are protected and that third party complies with the terms of this notice.

7. Ways we may collect your personal information, including from third parties.

We may collect personal information about you in the following ways:

- When you sign up for our services (e.g. newsletters, events, workshops)
- When you contact us or use our services (including email)
- When you make a donation
- Through surveys, questionnaires, or complaints
- From your activity on our website (e.g. pages visited, searches made)
- From photos, videos, or recordings taken at our events
- When you request advice or guidance

We usually collect this information directly from you, but sometimes we may receive it from trusted third parties, such as:

- Donation platforms (e.g. JustGiving)
- Event services (e.g. Eventbrite)
- Email platforms (e.g. Mailchimp)
- Survey tools (e.g. SurveyMonkey).

Even if your data comes from a third party, your rights under this notice still apply.

8. How we use cookies

In order to improve our website, we use 'cookies' and similar technologies. Cookies are small pieces of information sent by us to your computer or mobile device and stores on your device to allow us to recognise you when you next visit. We use the following cookies:

- Strictly necessary cookies these are cookies that are required for the operation of our website. They include, for example, cookies that enable you to log into secure areas of our website.
- Analytical/performance cookies these allow us to recognise and count the number of visitors and to see how visitors move around our website when they are using it. This helps us to improve the way our website works, for example, by ensuring that users are finding what they are looking for easily. Analytical/Performance cookies come from PostHog and persist for 365 days.

We will ask you whether you give your consent for the use of cookies when you enter our website. Cookies are only set once consent has been provided.

9. How we store this data

We retain personal data only for as long as necessary to fulfil the purposes for which it was collected. This depends on the nature of our relationship with you, the type of data, and any legal obligations. When storing data, we will ensure we are meeting legal requirements, e.g. financial transactions will be retained in line with HMRC requirements, and for mailing lists, we will retain data until consent is withdrawn.

In general, we review data retention periods regularly and take steps to securely delete or anonymise data that is no longer needed.

10. Your rights

Under data protection laws, you have the following rights:

- Access your personal data
- Correct inaccurate or incomplete data
- Request deletion of your data ('right to be forgotten') in certain circumstances
- Restrict or object to processing
- Request a copy of your data in a portable format
- Withdraw consent at any time (where processing is based on consent)

More information on your rights can be accessed via the ICO website here - https://ico.org.uk/for-organisations/uk-gdpr-guidance-and-resources/individual-rights/

11. How to exercise your right

To exercise your rights or if you have any questions or concerns, please contact our data protection lead on info@purposefulventures.org.uk. We will respond within one month of receiving your request. In complex cases, we may extend this by up to two further months, but we will inform you if this is the case.

If you are not satisfied with how we handle your data or respond to your request, you also have the right to lodge a complaint with the Information Commissioner's Office (ICO):

- Report a concern online at https://ico.org.uk/make-a-complaint/
- Call 0303 123 1113
- Or write to: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF