



Privacy Notice

Introduction

Coventry & Warwickshire (CW) Growth Hub Group, (referred to in this policy as “we” or “us”), recognises the importance of the privacy and the security of your personal information. This privacy policy explains what we do to look after your personal data. It tells you:

- Where/how it is collected
- What we do with it
- How we keep it secure
- What your privacy rights are and how the law protects you
- How to contact us with any queries that you have

About This Policy

This privacy policy applies to you if you work with or receive services from the CW Growth Hub Group, whether this is online, by phone, in person, through written forms, through mobile applications or otherwise by using any of our websites or interacting with us on social media. This privacy notice explains our commitment to protect your personal information and has been adopted by all the companies and businesses who are part of the CW Growth Hub Group.

This privacy notice does not cover the use of personal data which we process about employees of CW Growth Hub Group companies. This information is detailed within our staff handbook.

On specific occasions when we are collecting or processing personal data about you on behalf of third-party organisations, for example in the delivery of business support programmes, additional privacy information may be applicable. It is important that you read any additional information provided so that you are fully aware of how and why we are using your data.

Who We Are

The CW Growth Hub Group is a group of Private Limited Companies, each of which has a common purpose – to engage businesses with support, in order to drive business, economic, and professional development within SMEs, by facilitating access to funding, advice, growth planning, employment, skills, investment, supply chain opportunities, networking, overseas trade, innovation, and enterprise, for the benefit of all. The CW Growth Hub Group comprises a number of different legal entities:

- Coventry & Warwickshire Growth Hub Limited. Company number: 09146585
Registered address: Coventry University Enterprise Centre, Puma Way, Coventry, CV1 2TT
- C&W Business Solutions Limited. Company number: 10369498
Registered address: As above
- Coventry & Warwickshire Champions. Company number: 11224379
Registered address: As above

Members of the CW Growth Hub Group are either Joint Data Controllers, for personal information processed by companies within the Group where there is a common purpose, or independent Data Controllers where a member of the group is processing personal information for their own purposes. When you are working or interacting with one of our Group companies, your data will be looked after in accordance with this privacy notice.

CW Growth Hub Group companies share a data protection officer (DPO) in common, who is responsible for overseeing questions in relation to this privacy policy across CW Growth Hub Group companies. Contact details for the DPO are detailed in the Contact Us section at the end of this policy.

When and How We Collect Your Personal Data, and Why We Have It

From the first moment you interact with us, we are collecting data.

Sometimes you provide us with data, sometimes data about you or your business is collected automatically, and sometimes CW Growth Hub Group or other organisations or agencies, such as government business support services, will provide us with data about you or your business. Some examples of when we process your personal data may be:

- To respond to your enquiries
- To assess and manage your application for our services or events
- To deliver and manage our services to you
- To take pre-contractual and contractual steps with you
- To comply with our legal obligations as an organisation.

Personal data, or personal information, means any information about an individual from which that person can be identified. 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 (with examples of each data type):

| Information you provide to us: | | |
|---|------------------------------|---|
|  | Identification data | first name, maiden name, last name, username or similar identifier, marital status, title, date of birth, sex, place of birth, age, image, nationality, national insurance number and information taken from identification documents such as your passport or driving licence |
|  | Personal contact data | home address, delivery address, email address and telephone numbers |
|  | Business contact data | Business operational address, business registered address, billing address, delivery address, email address and telephone numbers |
|  | Financial data | financial position, billing address, financial transaction data, details about additional insured parties, bank account, payment card details and details about payments to and from you and other details of products and services you have purchased from us, business financial information such as turnover |

| | | |
|---|---|---|
|  | Employment & Educational Data | job title, qualifications, employment status, references, directorships, business interests, employment ID, employment records and salary. |
|  | Marketing and Communications Data | preferences in receiving marketing from us and our third parties and your communication preferences. |
|  | Special Categories of Personal Data: | includes details about your race or ethnicity, religious, sexual orientation, trade union membership. Where required for legal purposes, for example, for employment purposes such as health information, criminal conviction data including information about criminal convictions and offences. |
| | | |
| | | |

Information we collect automatically:

| | | |
|---|---------------------------|--|
|  | Technical data | 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 our websites, information from Cookies and similar technologies |
|  | Website usage data | includes your username and password, purchases or orders made by you, your interests, preferences, feedback and survey responses, information about how you use our websites, products and services. |

Information we receive from third-parties or publicly available sources:

| | | |
|---|---|---|
|  | Third-Party Integrations | If you choose to enable an integration, the third-party may share some information about you with us to make your experience more seamless, such as your name, email, or other content or information needed to facilitate the integration. Additionally, if you sign up or login to our services using one of our single-sign-on providers (e.g., Google, Apple, etc.), we collect authentication information provided to us by the provider to allow you to log in. |
|  | Marketing or demographic information | We may receive or purchase marketing or demographic information about you from third parties or partners, for example, data about your organisation or industry or other public information from sources like social media or online professional profiles. We may combine this information with other data we already have to improve your experience with our Services or inform you of Services we think may be of interest to you. |
|  | Agencies and governments departments | Government departments, Electoral role, Companies House |

Data We Process About Your Businesses

Sometimes we will process information about you, and sometimes we process information about your business. As an organisation supporting local business, it's important for us to clarify where business and personal data differ.



The Information Commissioner's Office (ICO) has some useful guidance that will help to explain this which can be found [here](#): The ICO explain that;

"Information concerning a 'legal' rather than a 'natural' person is not personal data. Consequently, information about a limited company or another legal entity, which might have a legal personality separate to its owners or directors, does not constitute personal data and does not fall within the scope of the UK GDPR. Similarly, information about a public authority is not personal data. However, the UK GDPR does apply to personal data relating to individuals acting as sole traders, employees, partners, and company directors wherever they are individually identifiable, and the information relates to them as an individual rather than as the representative of a legal person. A name and a corporate email address clearly relates to a particular individual and is therefore personal data. However, the content of any email using those details will not automatically be personal data unless it includes information which reveals something about that individual, or has an impact on them. [Read more](#)

Should you have any questions about whether the data we are processing about you or your business constitutes personal or business data, then please do not hesitate to contact us.

Anonymised Data

We also collect, use and share aggregated data such as statistical or demographic data. 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.

What happens if you decide not to share your data with us?

Where we need to collect personal data by law, or under the terms of a contract we have with you and you decide not to share that with us, we may not be able to offer you the services you have requested or perform the contract we have with you. In this case, we may have to cancel a product or service you have with us but we will notify you if this is the case at the time.

How we 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:

- Where we need to perform the contract we are about to enter into, or have entered into, with you.
- 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.
- Where we need to comply with a legal or regulatory obligation.
- Where the processing is necessary to perform a task in the public interest or an official function.
- Where we have your consent. Although, generally we do not rely on consent as a legal basis for processing your personal data, other than in relation to sending business to consumer marketing communications or where required to process Special Category Data. You have the right to withdraw consent to marketing at any time by contacting us.
- Where we have a legitimate interest, for example sending you our newsletter or communications about business support for which you may be eligible.



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.

Marketing

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising. We have established the following personal data control mechanisms:

- **Marketing Communications:** You will receive marketing communications from us if you have requested information from us or if we can demonstrate that we have a legitimate interest in sending marketing material to you. This may be from the company with whom you have interacted or worked, or one of the other CW Growth Hub Group companies where we identify a legitimate interest in sending the communication to you.
- **Opting Out:** 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.

Sharing Your Data

As a partnership working organisation, we are often required to share your data with other organisations. For example, we use third parties to help us host our infrastructure and applications, communicate with customers, power our emails (etc.), as we believe they are the best in their field at what they do.

We also pass your information on to some third parties for the following reasons:

- To deliver the services you have requested from us, which might include, but is not limited to, the Department for Business & Trade, West Midlands Combined Authority, Coventry City Council, Warwickshire County Council, Warwickshire District & Borough Councils, Coventry & Warwickshire Chamber of Commerce, etc.
- To deliver services that we have a legal obligation to provide to you, and to ensure your services are delivered as you expect.
- For legal or regulatory purposes including the detection of crime and fraud prevention.
- If we choose to sell, transfer, or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them.

Your data is shared only when strictly necessary and according to the safeguards and good practices detailed in this Privacy Notice.

Here are a few examples of our key third-party service providers, along with some information about the types of data that may be shared with them and why.

Key Group Organisations and Partners: These could be other companies in The CW Growth Hub Group acting as joint controllers or processors and who are based in the United Kingdom, where data is required for the provision of corporate services including IT and system administration, HR, marketing and financial services and management reporting. We also work with funders, delivery partners, and licensing bodies who require information in relation to the services that we provide, for example where data may be required for the assessment of business support performance. We may



also work with third-party business support providers, such as Coventry & Warwickshire Chamber of Commerce, Warwick Manufacturing Group, The MTC, etc.

Organisational Management and Infrastructure: These are key companies that help us run our business and support our IT & Technology infrastructure. We may also transfer your personal information to our partners, suppliers, insurers and agencies, but only where they meet our standards of data and security. We only share information which allows them to provide their services to us or facilitate them providing our services to you. Examples include Microsoft Office365 for the provision of our office applications for document creation, management, and email communication. We also use professional advisers acting as processors including lawyers, bankers, auditors and insurers who provide consultancy, banking, legal, insurance and accounting services. We may also use credit check and debt recovery agencies for financial purposes.

Government or our Regulators: These may include the Information Commissioner's Office (ICO), if you raise a dispute or complaint and is eligible for review by an ombudsman service, or we are required to notify them under our legal obligations - e.g. breach notification to the ICO. It may also include HM Revenue & Customs regulators and other authorities acting as processors or joint controllers who require reporting of, or access to, processing activities in certain circumstances.

International Transfers

In some circumstances we may transfer data to, and store data in, countries which are outside the United Kingdom. As some of our partners and service providers are based outside of the UK, your personal data will be accessed or otherwise processed in other countries. We have implemented measures and safeguards to ensure that any transfer of data is compliant with UK data protection laws. For example, we put in place International Data Transfer Agreements/Standard Contractual Clauses that are approved by the ICO, the EU or the UK Government after completing a detailed assessment to ensure the companies receiving your data can comply with these Clauses. Please contact us if you wish to know more.

Data Security

We have implemented appropriate technical and organisational measures to protect the confidentiality of the personal data that you entrust us with. This includes robust security mechanisms, business continuity and resilience plans and ongoing testing of these measures. For example, 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 data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, 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.



For details of retention periods for different aspects of your personal data please contact us.

Third Party Links

Our website and other documents you receive from us may include links to third-party websites, plugins and information. Following these links 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.

Your Legal Rights

Under the UK's data protection law, you have rights including:

- **Your right of access:** you have the right to ask us for copies of your personal information.
- **Your right to rectification:** you have the right to ask us to rectify personal information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete.
- **Your right to erasure:** you have the right to ask us to erase your personal information in certain circumstances.
- **Your right to restriction of processing:** you have the right to ask us to restrict the processing of your personal information in certain circumstances.
- **Your right to object to processing:** you have the right to object to the processing of your personal information in certain circumstances.
- **Your right to data portability:** you have the right to ask that we transfer the personal information you gave us to another organisation, or to you, in certain circumstances.

You are not required to pay any charge for exercising your rights. If you make a request, we have one month to respond to you. Please contact us using the contact details at the end of this policy if you wish to make a request.

Contact us

If you would like to exercise one of your rights as set out in this privacy policy, or you have a question or a complaint about this privacy policy or the way your personal information is processed, please contact us.

- By email: dataprotectionofficer@cwgrowthhub.co.uk
- By post: Data Protection Officer, CW Growth Hub, Coventry University Enterprise Centre, Puma Way, Coventry, England, CV1 2TT

You also have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues. Go to www.ico.org.uk/concerns to find out more. We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

This privacy policy was last updated in February 2024