

# PRIVACY NOTICE

**VSPARK CIC** (“we”, “our”, “us”, “the Company”) is a registered UK Community Interest Company (registration number 13405750) trading as Visionnaires, supporting people to turn their ideas into successful businesses. This Privacy Notice explains how we collect, use and share information that you provide to us through our website (<https://www.visionnaires.ac.uk/>) or otherwise through your interactions with us if you are a student or partner. We collect information from visitors to this website through our application forms, data collection forms and every time you email us. We also collect additional information about your visit to our website; please see below for details of our cookies policy. Our registered office is at CONEL, Tottenham Centre, High Road London N15 4RU.

## Contents

### 1. **Personal data we process**

1.1 **Personal data** is any information that relates to you. When we **process** this information, we are required by law to give you details about how and why we do this. The personal data we process about you depends on your relationship with us.

1.2 **If you are a user of our website**, you may choose to fill in the form on our website to register your interest in becoming a Visionnaire, or contact us to ask a query. In order to do this, we collect your name, email address, details about what programme you are interested in, and any additional information you choose to provide in your message.

1.3 We may also collect and store information about your device and your visits to our website such as your IP address, geographical location, browser type, referral source, length of visit, and number of page views. See our section on cookies below for further details.

1.4 We collect an IP address from all visitors to our website. An IP address is a number that is automatically assigned to your computer when you use the internet. We use IP addresses to help diagnose problems with our server, administer our website, analyse trends, and gather broad demographic information for aggregate use in order for us to improve the site, and deliver customised, personalised content.

1.5 **If you are a prospective or registered participant on one of our programmes**, we will process information about you in order to enrol you on one of our programmes. This includes your name, email address, mobile phone number and details in the programme you are interested in. Once registered, we may process additional information such as your age, gender or more sensitive information which you choose to give us about your learning needs, such as your dyslexia status. We may also process information about your ethnicity, for the purposes of equality monitoring. Under UK data protection law, this is considered as **special category data**. We only process this information about you if we have a valid reason and only if the law allows us to do so (see our section on lawful bases below for further details).

1.6 If you are **a mentor as part of one of our programmes**, we will process information about you in order to register you as a mentor and to support you as a mentor. This includes name, email address, and details of the mentorship you are interested in providing.

1.7 If you are a former participant on one of our programmes, we will continue to offer you access to seminars and other resources. This will involve us using your name, email address and mobile phone number to invite you to seminars and give you access to other resources.

1.8 We were previously part of the Capital City College Group (the “**CCCG**”) and are the controllers of personal data that you may have provided directly to the CCCG when you enrolled on a programme delivered by CCCG in partnership with Visionnaires. For further details, see the CCCG website: <https://www.capitalccg.ac.uk/>

1.9 **If you are a business partner**, we may process your name, email address, business address, records of your correspondence with us, and other information that we may be required to process in the course of your relationship with us.

## 2. **Why we process your personal data**

2.1 We process your personal data for various reasons, including:

- (a) To contact you, including to respond to your enquiries;
- (b) To send you information about us, including newsletters, information about our events, and programmes;
- (c) To administer programmes, including sign-ups and general management;
- (d) For business purposes, such as analytics, research, advertising and marketing, and operational purposes;
- (e) To maintain, operate, customise and improve our services;
- (f) To offer services to our our alumni;
- (g) To comply with a specific legal requirement, law enforcement, and to maintain our security or protect our or a third party’s interests; and
- (h) As otherwise disclosed at the time of collection or use.

2.2 We do not use your personal data for automated decision-making or to engage in profiling. If a situation arises where we intend to use your personal data for any reason beyond the original purpose or incompatible with its original purpose, we will notify you and provide additional information ahead of time.

2.3 You are under no statutory or contractual obligation to provide us with your personal data. If you choose not to do so, of course, we may not be able to contact you or sign you up to one of our programmes.

## 3. **Lawful bases**

3.1 We will only use personal data when the law allows us to (i.e. where we have a ‘lawful basis’). Most commonly, we will use your personal data in the following circumstances:

- (a) 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. For example, we have a legitimate interest in administering the Company;
- (b) Where it is necessary for the **performance of a contract** with you;
- (c) Where it is necessary to comply with a **legal obligation** on us (for example, reporting to HM Revenue and Customs);
- (d) Where we wish to contact you with marketing or promotional information about our activities we may rely on your **consent**;
- (e) Where you disclose your special category data (e.g. if you provide this when signing up to one of our programmes) we may ask for your **explicit consent** to use your personal data prior to your participation in a programme.
- (f) In the context of collecting data on disability, race and ethnicity for equality monitoring, we rely on the substantial public interest condition of processing necessary to identify or keep under review the existence of absence of **equality of opportunity or treatment** as further set out under the Data Protection Act 2018.

#### 4. **How we share your personal data**

4.1 We may share your personal data with third parties, including the following:

- (a) With contractors, suppliers, or other third parties that provide services on our behalf;
- (b) With academic institutions with which we partner on delivery of programmes; and
- (c) With your consent or as otherwise disclosed at the time of data collecting or sharing.

4.2 We may also share your personal data with third parties where required by law or to protect our interests or the interests of a third party including with any of our professional advisors such as lawyers, auditors or accountants.

#### 5. **International data transfers**

5.1 Please be aware that the personal data we process may be transferred to and maintained on servers or databases located outside the UK, where the privacy laws may not be as protective as those in your location.

5.2 Where personal data is transferred outside the UK, we will take steps to ensure that your personal data remains protected. This includes entering into the standard contractual clauses (approved by the UK Government) where personal data is transferred to a country outside the United Kingdom. Transfers of personal data from the UK to countries in the European Economic Area are considered to be properly protected.

#### 6. **How long do we store your personal data**

6.1 The personal data you provide will be kept in accordance with our Data Retention Policy.

6.2 The criteria used to determine the period of storage of personal data is:

- (a) The respective statutory retention period;
- (b) Our contractual and/or business relationships with you;
- (c) (Potential) disputes; and
- (d) Any guidelines issued by relevant supervisory authorities.

6.3 After expiration of that period, the corresponding information is routinely securely deleted, as long as it is no longer necessary for the fulfilment of a contract, the initiation of a contract or to protect or defend our position or that of a third party. If you have any questions about retention periods, please contact us at [mail@visionnaires.ac.uk](mailto:mail@visionnaires.ac.uk).

6.4 We don't usually retain your personal data for a period of six (6) years after our last contact with you.

## 7. **Your rights**

7.1 Under certain privacy laws, you have rights relating to your personal data. You may have a right to the following:

- (a) To request **access** to the personal data we hold about you;
- (b) To request that we **rectify** or **erase** your personal data;
- (c) To request that we **restrict** or **block** the processing of your personal data;
- (d) To **object** to our processing of your personal data in certain circumstances;
- (e) Under certain circumstances, to ask us to **port** personal data about you that you have provided to us to you or a third party; and
- (f) Where we previously obtained your consent (or are relying on consent to process your personal data), to **withdraw consent** to processing your personal data.

7.2 To exercise these rights, contact us via the "Contact Us" section below. Please be aware that the Company may be unable to provide these rights to you under certain circumstances, such as if we are legally prevented from doing so or can rely on exemptions.

7.3 Additionally, you have the right to **lodge a complaint against us** concerning how we process your personal data. To do so, contact the supervisory authority. In the UK, this is the Information Commissioner's Office at [www.ico.org.uk/concerns](http://www.ico.org.uk/concerns).

## 8. **Other websites**

8.1 Our website contains links to other websites. Please note that when you click on one of these links, you are entering another website for which the Company has no responsibility. We encourage you to read the privacy notices on all such sites as their notices may be different than ours.

## 9. **Cookies**

9.1 Please see our Cookies Notice below to read about how we use any tracking technologies on the website.

10. **Updates to this Privacy Notice**

10.1 We may change this Privacy Notice at any time in our discretion. If we decide to make significant changes to our Privacy Notice, we will contact you where reasonably possible. We will also post these changes on this page.

11. **How to contact us**

11.1 If you have any questions about this Privacy Notice, the practices of this website, or our relationship with you, you can contact us by email at [mail@visionnaires.ac.uk](mailto:mail@visionnaires.ac.uk).

Last updated: 6 August 2021