
PRIVACY POLICY

Introduction

Welcome to the Minerva Innovation Group Ltd's Privacy Policy.

Minerva Innovation Group Ltd understands that your privacy is important to you and that you care about how your personal data is used. We respect and value the privacy of everyone who visits this website, <http://minervainnovation.co.uk/> (**Our Site**), and will only collect and use personal data in ways that are described here, and in a way that is consistent with our obligations and your rights under applicable law.

This Privacy Policy will inform you as to how we look after your personal data when you visit our website (regardless of where you visit it from). Please read this Privacy Policy carefully and ensure that you understand it. By providing your personal data to us, you acknowledge and agree that you have fully understood this Privacy Policy, and consent to the collection, use, processing and disclosure of your personal data as described in this Privacy Policy.

IMPORTANT INFORMATION AND WHO WE ARE

1. Purpose of this Privacy Policy

- a. This Privacy Policy aims to give you information on how Minerva Innovation Group Ltd collects and processes your personal data through your use of Our Site including any data you may provide through Our Site when you complete the contact form or contact us.
- b. Our Site is not intended for children and we do not knowingly collect data relating to children.
- c. It is important that you read this Privacy Policy together with any other privacy policy or fair processing policy we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This Privacy Policy supplements other notices and privacy policies and is not intended to override them.

2. Information about us

- a. Our Site is owned and operated by Minerva Innovation Group Ltd, a private company limited by shares and registered in Scotland under company number SC674231 and whose registered office is at 2/7; 29 Shakespeare Street, Glasgow, United Kingdom, G20 8TH.
- b. Minerva Innovation Group Ltd is the controller and responsible for your personal data (referred to as **Minerva, we, us** or **our** in this Privacy Policy).
- c. We have appointed a data privacy manager (**DPM**) who is responsible for overseeing questions in relation to this privacy policy. If you have any questions about this Privacy Policy, including any requests to exercise your legal rights, please contact the DPM using the details set out below.

Name of DPM: Dr Emily Pearce

Email address: info@minervainnovation.co.uk

Postal address: OFFICE NO. GF 24; 20-23 Woodside Place; G3 7QL; Glasgow; UK

- d. You 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 (www.ico.org.uk). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

3. **Changes to the privacy policy and your duty to inform us of changes**

- a. We keep our Privacy Policy under regular review. This version is dated 16 September 2020.
- b. It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

4. **What Is Personal Data?**

- a. Personal data is defined by the General Data Protection Regulation (EU Regulation 2016/679) (the **GDPR**) and the Data Protection Act 2018 (collectively, the **Data Protection Legislation**) as 'any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier'.
- b. Personal data is, in simpler terms, any information about you that enables you to be identified. Personal data covers obvious information such as your name and contact details, but it also covers less obvious information such as identification numbers, electronic location data, and other online identifiers. It does not include data where the identity has been removed (this is referred to as anonymised data).

5. **What data do we collect?**

- a. Depending on your use of Our Site, we may collect and hold some or all of the personal and non-personal data set out below, using the methods also set out below. Please also see clause 11 below for more information about our use of Cookies and similar technologies. We do not collect any 'special category', 'sensitive' personal data, personal data relating to children or data relating to criminal convictions and/or offences through our Site.
 - i. **Identity Data** includes first name, maiden name, last name, username or similar identifier, marital status, title, date of birth and gender.
 - ii. **Contact Data** includes billing address, delivery address, email address and telephone numbers.
 - iii. **Financial Data** includes bank account and payment card details.
 - iv. **Transaction Data** includes details about payments to and from you and other details of products and services you have purchased from us.
 - v. **Marketing and Communications Data** includes your preferences in receiving marketing from us and our third parties and your communication preferences.
- b. We also collect, use and share **Aggregated Data** such as statistical or demographic data for any purpose. Aggregated Data could be derived from your personal data but is not considered personal data in law as this data will **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 policy.
- c. We do not collect any **Special Categories of Personal Data** about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union

membership, information about your health, and genetic and biometric data). Nor do we collect any information about criminal convictions and offences.

6. If you fail to provide personal data

- a. Where we need to collect personal data to follow up an enquiry from Our Site, by law, or under the terms of a contract we have with you, and you fail to provide that data when requested, we may not be able to follow up on your enquiry or perform the contract we have or are trying to enter into with you (for example, to provide you with services relating to assessing the eligibility of business activities under HMRC's R&D Tax Relief Scheme). In this case, we may have to cancel a service you have with us but we will notify you if this is the case at the time.

7. How is your personal data collected?

We use different methods to collect data from and about you including through:

- a. **Direct interactions.** You may give us your Identity, Contact and Financial Data by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:
 - (i) ask us to provide services to you;
 - (ii) request marketing information or additional information about our services to be sent to you;
- b. **Third parties or publicly available sources.** We will receive personal data about you from various third parties and public sources as set out below:
- c. **Technical Data** from the following parties:
 - (i) analytics providers such as Google based outside the EU;
 - (ii) advertising networks and public directories such as FarmingUK, owned by Agrios Ltd based inside the EU;
- d. **Contact, Financial and Transaction Data** from providers of technical, payment and delivery services.
- e. **Identity and Contact Data** from publicly available sources such as Companies House, published literary materials on websites, blogs and magazines.

8. How we use your personal data

- a. Under the Data Protection Legislation, we must always have a lawful basis for using personal data. Most commonly, we will use your personal data in the following circumstances:
 - i. Where we need to use your personal data for Performance of the Contract we are about to enter into or have entered into with you.
 - ii. Where it is necessary because we or a third party has a Legitimate Interest in doing so and your interests and fundamental rights do not override those interests.
 - iii. Where we need to Comply with a Legal Obligation.

For these purposes, the following phrases have the following meanings:

- **Performance of Contract** means processing your data where it is necessary for the performance of a contract to which you are a party or take steps at your request before entering into such a contract.
- **Legitimate Interest** means the interest of our business in conducting and managing our business to enable us to give you the best service/product and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before

we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by contacting us.

- **Comply with a legal obligation** means processing your personal data where it is necessary for compliance with a legal obligation that we are subject to.

Generally, we do not rely on consent as a legal basis for processing your personal data although we will get your consent before sending third party direct marketing communications to you via email or text message. You have the right to withdraw consent to marketing at any time by contacting us.

9. Purposes for which we will use your personal data

- We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.
- 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 where more than one ground has been set out in the table below.

What we do	What Data We Use	Our Lawful Basis(es)
To register you as a new customer.	(a) Identity (b) Contact	Performance of a contract with you.
Supplying our services to you.	(a) Identity (b) Contact (c) Financial Transaction	(a) Performance of a contract with you. (b) Necessary for our legitimate interests. (c) Comply with legal obligation
Managing payments for our services: (a) Manage payments, fees and charges. (b) Collect and recover money owed to us.	(a) Identity (b) Contact (c) Financial (d) Transaction (e) Marketing and Communications	(a) Performance of a contract with you. (b) Necessary for our legitimate interests (to recover debts due to us).
To manage our relationship with you which will include: (a) Notifying you about changes to our terms or privacy policy (b) Asking you to leave a review or take a survey	(a) Identity (b) Contact (c) Profile (d) Marketing and Communications	(a) Performance of a contract with you (b) Necessary to comply with a legal obligation (c) Necessary for our legitimate interests (to keep our records updated and to study how customers use our products/services)
To administer and protect our business and Our Site (including troubleshooting, data analysis, testing, system	(a) Identity (b) Contact (c) Technical	(a) Necessary for our legitimate interests (for running our business, provision of administration

maintenance, support, reporting and hosting of data)		and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise) (b) Necessary to comply with a legal obligation
To use data analytics to improve our website, services, marketing, customer relationships and experiences	(a) Technical (b) Usage	Necessary for our legitimate interests (to define types of customers for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)
Supplying you with information by email and post that you have opted-in-to (you may opt-out at any time by contacting the DPM.	(a) Identity (b) Contact (c) Technical (d) Usage (e) Profile Marketing and Communications.	Necessary for our legitimate interests.

10. 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:

- i. We may use your Identity, Contact, Technical, Usage and Profile Data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which products, services and offers may be relevant for you (we call this marketing).
- ii. You will receive marketing communications from us if you have requested information from us or purchased services from us and you have not opted out of receiving that marketing.

b. Opting out

- i. You can ask us or third parties to stop sending you marketing messages at any time by contacting us at any time.
- ii. Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us as a result of as part of the services we are providing to you.

11. How do we use Cookies?

- a. A Cookie is a small text/data file that is sent to your computer when you visit a website. Cookies collect information about users, such as their names, addresses, email. When you visit our Site again the cookie allows that site to recognise your browser. Whilst Cookies and the information they transmit may not identify an individual on their own, they may be able to do so in combination with other information held by us or a third party.
- b. We use the following cookies:

- i. **Strictly necessary cookies.** These are cookies that are required for the operation of Our Site. They include, for example, cookies that enable you to log into secure areas of Our Site, use a shopping cart or make use of e-billing services.
- c. You may, if you wish, deny consent to the placing of Cookies, however certain features of Our Site may not function fully or as intended.
- d. In addition to the controls that we provide, you can choose to enable or disable Cookies in your internet browser. Most internet browsers also enable you to choose if you wish to disable Cookies. By default, most internet browsers accept Cookies, but this can be changed. Please consult the help menu in your internet browser or the documentation that came with your device.
- e. You can choose to delete Cookies on your computer or device at any time, however you may lose any information that enables you to access Our Site more quickly and efficiently including, but not limited to, login and personalisation settings.

12. Change of purpose

- a. We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us.
- b. If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.
- c. Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

13. Disclosures of your personal data

- a. We may share your personal data with the parties set out below for the purposes set out in the table above.

External Third Parties:

- (i) Service providers acting as processor based internationally who, provide amongst other things, IT and system administration services.
- (ii) Professional advisers acting as processors or joint controllers including your and our subcontractors, lawyers, bankers, auditors and insurers based in England and Wales or Scotland who provide consultancy, banking, legal, insurance and accounting services.
- (iii) HM Revenue & Customs, regulators and other authorities acting as processors or joint controllers based in the United Kingdom who require reporting of processing activities in certain circumstances.
- (iv) Third parties to whom we may 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. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this Privacy Policy.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

13. International transfers

- a. We share your personal data within the Mixcrosoft Corporation Group, based in USA as the provider of IT systems and storage solution and WIX based in Israel which Hosts Our Site. This will involve transferring your data outside the European Economic Area (EEA).
- b. Whenever we transfer your personal data out of the EEA, we endeavour to ensure a similar degree of protection is afforded to your data as would be the case if it were stored within the EEA. :

14. Data security

- a. We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, 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.
- b. 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.

15. How long will you use my personal data for?

- a. We will only retain your personal data for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.
- b. 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, regulatory, tax, accounting or other requirements.
- c. By law we have to keep basic information about our customers (including Contact, Identity, Financial and Transaction information) for six years after they cease being customers for tax purposes. In some circumstances you can ask us to delete your data.
- d. In some circumstances we will anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes, in which case we may use this information indefinitely without further notice to you.

16. Your legal rights

- a. Under certain circumstances, you have rights under data protection laws in relation to your personal data.
 - (i) **Request access to your personal data** (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
 - (ii) **Request correction of your personal data we hold about you.** This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.

- (iii) **Request erasure of your personal data.** This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.
- (iv) **Object to processing of your personal data** where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.
- (v) **Request restriction of processing your personal data.** This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.
- (vi) **Request transfer of your personal data.** We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.
- (vii) **Right to withdraw consent** where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

If you wish to exercise any of the rights set out above, please contact us.

- b. **No fee is usually required.** You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we could refuse to comply with your request in these circumstances.
- c. **What we may need from you.** We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.
- d. **Time limit to respond.** We try to respond to all legitimate requests within one month. Occasionally it could take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.