

DATA PROTECTION AND PRIVACY POLICY STATEMENT

In the order for Enterprise CUBE to deliver its services it must collect, store and handle data about individuals, including customers. Enterprise CUBE is committed to ensuring that it collects, handles and stores this data in an appropriately and that its practices do not put individuals or their data at risk.

This policy describes how this personal data must be collected, handled and stored to meet the company's data protection standards — and to comply with the law.

Enterprise CUBE will take every reasonable step to ensure it

- Complies with data protection law and follows good practice
- Protects the rights of staff, customers and partners
- Is open about how it stores and processes individuals' data

DATA PROTECTION LAW

The Data Protection Act 1998 describes how organisations — including Enterprise CUBE— must collect, handle and store personal information.

Enterprise CUBE will handle data in accordance with the General Data Protection Regulation (GDPR).

Enterprise CUBE CIC

Registered Address:
73 Park Lane
Croydon, CR0 1JG

Policy and procedure owner:
Enterprise CUBE Directors
Effective from: 01 April 2021
Due for review: 01 April 2022

web: www.enterprisecube.org
email: info@enterprisecube.org
Company Number: 08333228
VAT : 169947932



HOW WE USE DATA ONLINE LEARNERS

When our customers and users register with us we commit to only using your data in certain ways:

- Enterprise CUBE will retain information about you on a database and handle that data in accordance with the UK Data Protection Act 1998 and GDPR regulations.
- Enterprise CUBE will use this data for the purposes of administration of the StriveLive programme, and to support you with your businesses. Enterprise CUBE will contact you from time to time and send you messages in connection with supporting your start-up business. All communication from us or our staff can be stopped or unsubscribed from at any time.
- Enterprise CUBE may disclose information supplied by you to the specific organisations who funded or organised the Strive project you are enrolled in and the organisation that arranged your place on that project.
- Enterprise CUBE will use information it holds to produce public reports of aggregated summary data about its work provided, however, no statistical information that would identify you as an individual will be published or shared publicly.
- Enterprise CUBE will not use an individual's data for marketing purposes or pass data to any third parties other than with the express consent of the individual.

USE OF COOKIES ONLINE USERS

The primary purposes of our use of cookies is to provide a convenience to you time.

You can accept or decline cookies, and still make use of our websites and services. Most internet browsers, such as Chrome or Safari, automatically accept cookies, but you can usually modify your browser setting to decline cookies if you prefer.

Enterprise CUBE's website uses "cookies" to help you personalise your online experience. A cookie is a text file that is placed on your hard disk and stores information. Cookies cannot be used to run programs or deliver viruses to your computer. Cookies are uniquely assigned to you and can only be read by a server in the domain that issued the cookie to you.

For example, if you want to quickly log into your Strive learning account and start learning where you left the site last time, a cookie helps Enterprise CUBE to recall this specific information.

Cookies will store some personal information, such as recalling your email address you use for logging into the Strive learning portal.

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DISCLOSING DATA FOR OTHER REASONS

In certain circumstances, the Data Protection Act allows personal data to be disclosed to law enforcement agencies without the consent of the data subject.

Under these circumstances, Enterprise CUBE will disclose requested data. However, Enterprise CUBE will ensure the request is legitimate, seeking assistance from the company's legal advisers where necessary.

REACH OF THIS POLICY

This policy applies to:

- The head office of Enterprise CUBE
- All branches of Enterprise CUBE
- All staff and volunteers of Enterprise CUBE
- All contractors, suppliers and other people working on behalf of Enterprise CUBE

It applies to all data that the company holds relating to identifiable individuals, even if that information technically falls outside of the Data Protection Act 1998. This can include:

- Names of individuals
- Postal addresses
- Email addresses
- Telephone numbers
- ...plus any other information relating to individuals

DATA PROTECTION RISKS

This policy helps to protect Enterprise CUBE, and our customers, from some very real data security risks, including:

- Breaches of confidentiality. For instance, information being given out inappropriately.
- Failing to offer choice. For instance, all individuals should be free to choose how the company uses data relating to them.
- Reputational damage. For instance, the company could suffer if hackers successfully gained access to sensitive data.

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ROLES & RESPONSIBILITIES

Everyone who works for or with Enterprise CUBE has some responsibility for ensuring data is collected, stored and handled appropriately.

Each staff member that handles personal data must ensure that it is handled and processed in line with this policy and data protection principles.

However, these people have key areas of responsibility:

- The directors are ultimately responsible for ensuring that Enterprise CUBE meets its legal obligations.
- The Project Manager, Laura Mumford is responsible for:
 - Keeping the board updated about data protection responsibilities, risks and issues.
 - Reviewing all data protection procedures and related policies, in line with an agreed schedule.
 - Arranging data protection training and advice for the people covered by this policy.
 - Handling data protection questions from staff and anyone else covered by this policy.
 - Dealing with requests from individuals to see the data Enterprise CUBE holds about them (also called 'subject access requests').
 - Checking and approving any contracts or agreements with third parties that may handle the company's sensitive data.
- The Directors are responsible for:
 - Ensuring all systems, services and equipment used for storing data meet acceptable security standards.
 - Performing regular checks and scans to ensure security hardware and software is functioning properly.
 - Evaluating any third-party services the company is considering using to store or process data. For instance, cloud computing services.

PROACTIVE STEPS & SPECIFIC POLICIES

GENERAL STAFF GUIDELINES

- The only people able to access data covered by this policy should be those who need it for their work.
- Data should not be shared informally. When access to confidential information is required, employees can request it from their line managers.
- Enterprise CUBE will provide training to all employees to help them understand their responsibilities when handling data.
- Employees should keep all data secure, by taking sensible precautions and following the guidelines below.
- In particular, strong passwords must be used, and they should never be shared.
- Personal data should not be disclosed to unauthorised people, either within the company or externally.
- Data should be regularly reviewed and updated if it is found to be out of date. If no longer required, it should be deleted and disposed of.
- Employees should request help from their line manager or the data protection officer if they are unsure about any aspect of data protection.

DATA STORAGE

These rules describe how and where data should be safely stored.

When data is stored on paper, it should be kept in a secure place where unauthorised people cannot see it.

These guidelines also apply to data that is usually stored electronically but has been printed out for some reason:

- When not required, the paper or files should be kept in a locked drawer or filing cabinet.
- Employees should make sure paper and printouts are not left where unauthorised people could see them, like on a printer.
- Data printouts should be shredded and disposed of securely when no longer required.

When data is stored electronically, it must be protected from unauthorised access, accidental deletion and malicious hacking attempts:

- Data should be protected by strong passwords that are changed regularly and never shared between employees.
- If data is stored on removable media (like a CD or DVD), these should be kept locked away securely when not being used.
- Data should only be stored on designated drives and servers, and should only be uploaded to an approved cloud computing services.
- Servers containing personal data should be sited in a secure location, away from general office space.
- Data should be backed up frequently. Those backups should be tested regularly, in line with the company's standard backup procedures.
- Data should never be saved directly to laptops or other mobile devices like tablets or smart phones.
- All servers and computers containing data should be protected by approved security software and a firewall.

DATA ACCURACY

The law requires Enterprise CUBE to take reasonable steps to ensure data is kept accurate and up to date.

It is the responsibility of all employees who work with data to take reasonable steps to ensure it is kept as accurate and up to date as possible.

- Data will be held in as few places as necessary. Staff should not create any unnecessary additional data sets.
- Staff should take every opportunity to ensure data is updated. For instance, by confirming a customer's details when they call.
- Data should be updated as inaccuracies are discovered. For instance, if a customer can no longer be reached on their stored telephone number, it should be removed from the database.

RIGHT TO ACCESS YOUR DATA SUBJECT ACCESS REQUESTS

All individuals who are the subject of personal data held by Enterprise CUBE are entitled to:

- Ask what information the company holds about them and why.
- Ask how to gain access to it.
- Be informed how to keep it up to date.
- Be informed how the company is meeting its data protection obligations.

If an individual contacts the company requesting this information, this is called a subject access request. Subject access requests from individuals should be made by email, at info@enterprisecube.org. Enterprise CUBE will aim to provide the relevant data within 14 days.

Enterprise CUBE will always verify the identity of anyone making a subject access request before handing over any information.

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CONTACT AND COMPLAINTS

For further information or if you have any queries or questions about the data we hold about you, please contact our Data Protection Officer:

- Laura Mumford
Director – Data Controller
- info@enterprisecube.org
- 73 Park Lane, Croydon, CR0 1JG

Contacting the Information Commissioner’s Office (ICO)

If you are unhappy with the way we have handled your personal data or our response to a request you have made to us, you have the right to complain to the Information Commissioner’s Office:

Information Commissioner’s Office details:

- Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF
- 0303 123 1113
- casework@ico.org.uk
- www.ico.org.uk/concerns