### Welcome to the Scott Prenn Privacy Notice

This Privacy Notice is designed to help you understand everything you need to know about the what, why and how of our data gathering and processing operations, and what your legal rights are.

We hope you'll take some time to read this document; we've tried to keep it all as simple as possible and we will keep you informed if there are any changes to the way we process your personal data in the future, before making them.

Scott Prenn takes its responsibilities to protecting your data very seriously and we do advise you get to know our practices – If there's anything in this policy you don't understand or if you want to ask any questions, please feel free to contact us using any of the details below.

#### Who are we?

We are Scott Prenn, a limited liability partnership registered in England and Wales at Suit 590 28 Old Brompton Road, London, SW7 3SS, OC341731. In this document Scott Prenn will sometimes be referred to as "we".

## What kind of personal data might we ask you to provide?

Scott Prenn will only ever ask for personal data if it is required for a specific purpose; with that in mind we have created a full list of all the kinds of personal data that we may ask individuals to provide in order to achieve those purposes. The kinds of personal data we collect in order to facilitate the delivery of our goods and services are:

Your name, address, telephone number, email address, bank details (for payments), VAT information (where appropriate)

If you have provided your personal data to apply for a job at Scott Prenn we may also ask you to provide information about your work and educational history.

### Why do we collect personal data?

We will use personal data firstly to fulfil any contractual obligations that exist between us and yourself; where we request personal data be provided to meet the terms of any such contract you will be required to provide the relevant personal data or we will not be able to deliver the goods and/or services you want. In such cases the lawful basis of us processing the personal data is that it is necessary for the performance of a contract.

When you make a donation through Scott Prenn you are entering into a contract with us. In order to perform this contract we need to process and store your data. For example, we are required to acknowledge your gift and we may need to contact you if there are problems with your payment.

We will process your personal data in accordance with our legitimate business interests; this is on the considered measure that we need the personal data to achieve the various purposes and that it could be reasonable for an individual to expect their data to be used for those purposes.

Our data processing activities conducted on the lawful basis of 'legitimate interests' are:

- To provide you with goods and services you are looking for
- To inform you of other goods and services we provide, or offers/ activities that may interest you (direct marketing)
- To send notifications on subjects you have subscribed to, or otherwise asked us to keep you informed of
- To improve the quality of the services we offer, and to better understand our customers' needs by requesting feedback, or requesting you review the services we have provided, or we may send survey forms that we ask you to complete
- To notify you of any changes to the goods and/or services we provide, or have provided, that may affect you
- To allow us to understand the scale and range of our customer and supporter base; for statistical analysis and market research
- To recognise when customers re-engage with our services
- To allow us to support and maintain our products in active service

- To provide reference information to third party organisations where you request us to do so
- Improve website so content is delivered more efficiently
- To enhance the security measures in place that protect data we are responsible for
- To investigate any insurance claims
- To protect the company's assets
- To fulfil our obligations to donors through acknowledgement of their gift and agreed stewardship activities
- To administer donations or other payments (such as event tickets)
- For tax administration purposes (claiming of Gift Aid)
- Where appropriate, we may also carry out analysis of the personal information we collect about you and add publicly available information to create a profile of your preferences and philanthropic interests, so that we can contact you in the most appropriate way and with the most relevant information

We collect data regarding your relationship with Scott Prenn, which includes events you have attended, donations you have made, and communications you have had with a member of our staff. If you make a donation to Scott Prenn, we record the details of this donation including how it was received (e.g. cheque, direct debit), date of receipt, and whether gift aid is applicable. We will also store your contact details to enable us to properly thank and steward your donation.

To ensure that our communications are relevant to you and your interests, we collect information regarding your personal preferences, philanthropic history, and capacity to donate. This may include information provided through publicly available sources such as LinkedIn and news feeds. We may further obtain information about you from publicly available sources. These include Who's Who, Companies House, newspaper sites, corporate websites, and the Charity Commission.

We may also process your personal data in order for Scott Prenn to comply with our various legal obligations; this might include:

- Providing for financial commitments between us and yourself, or to relevant financial authorities
- · Cooperating with relevant authorities for reporting criminal activity, or to detect and prevent fraud
- To carry out required business operations and due diligence; e.g. administration, security, reorganisations, investment or corporate/asset sales
- To comply with industry regulatory requirements and any self-regulatory schemes

Where we have received your consent to do so we will process your personal data for the following purposes:

- To provide you with information regarding the goods and services of our partners or other third party organisations
- To provide reference and analysis information to our clients where you have volunteered to do so
- To monitor website and/or App activity to identify usage trends and/or behavioural patterns

You may withdraw your consent for us to process your personal data for these purposes at any time; after a withdrawal of consent request is received we may contact you to verify the request.

Withdrawing your consent for us to process your personal data will not affect the lawfulness of the processing beforehand.

# Where did we obtain your personal data?

Other than collecting data directly from you we gather it from other sources, such as:

 Technical sources that gather data over time when your visit our online platforms. Tracking tools such as internet cookies or analytical tools. These tools cannot be used to identify you personally.

- Some platforms may make use of your various device settings that allow us to identify your geographical location, these systems use technology such as IP Address mapping, WiFi, GPS signals and cell tower positioning. These tools cannot be used to identify you personally.
- From third party organisations, which can mean your personal data has been provided directly by another
  company for a specific purpose, or where you may have accessed our platforms through a third party such
  as social media providers or Google for example.

# Who will we share your information with?

In order to achieve the above stated purposes for which we process your personal data, we may need to share your personal data with various third-party service providers who act as data processors.

We share your personal data with third party organisations acting as data controllers or with specific individuals, groups or other organisations who act as neither data controllers nor data processors, but only where we are either legally required to do so by law or where doing so is necessary to achieve the intended stated purpose of processing the data

In the event that we sell or reorganise our business, or if otherwise required by law or by an authorised regulator, we may transfer your personal data as a part of the general business data to the relevant parties.

## Where is my data going to be stored?

Scott Prenn will not transfer your personal data to any country outside the European Union (EU) other than those that have been granted an adequacy decision under the General Data Protection Regulation (GDPR).

Data is stored in a secure, password-protected Scott Prenn server.

## How long will we keep your data for?

We will keep your personal data only for as long as required in order to achieve the purposes for which it was gathered, in line with this privacy notice.

For determining when personal data should be erased we shall take into consideration the amount of and sensitivity of the personal data we have, the amount of harm that could be caused by a data breach, the benefits of the purposes the data is being used for and any legal requirements that we are bound to.

You may request that we erase your personal data at anytime, though in cases where there is a remaining relevant or legal reason why we are required to keep the data we may opt to restrict the amount of processing being conducted to what is absolutely necessary in line with your legal rights in order to minimise the impact the processing will have.

Health and safety legislation places obligations on organisations to retain medical records for 40 years from the date of last entry:

- a) Under the Control of Lead at Work Regulations 1998
- b) As specified by the Control of Substances Hazardous to Health Regulations 1999
- c) Under the Control of Asbestos at Work Regulations 1987/1998

Where the lawful basis of our processing is based on protection of vital interests and insofar as the above obligations apply Scott Prenn will retain your personal data for 40 years.

### Your Rights, Our Responsibility

There are several rights granted to you immediately upon providing us with your personal information; some of these are mentioned above. We'd like you to know that at Scott Prenn we take your rights as a Natural Person seriously and will always conduct ourselves in a way that is considerate of our responsibility to serve your legal rights.

You have the Right of Access

This grants you the right to confirm whether or not your personal data is being processed, and to be provided with relevant details of what those processing operations are and what personal data of yours is being processed.

If you would like access to the personal data we have about you, we ask that you contact us by using any of the details below.

The Right to Rectification

This one is fairly straight forward; if you notice that the data we have about you is inaccurate or incomplete, you may request we rectify the mistake. We will make every effort to respond to requests of this type immediately.

The Right to Objection

The right to object is a basic freedom all democracies enjoy. If you wish to object to the way we use, or have used, your personal data you may do so freely.

The Right to Portability

This is a legal right afforded to you that states we must pass on all of the details you have provided to us in a machine readable format, either to you or to another provider of your choosing.

The Right to Complain

We will always try to maintain the highest standards and encourage the confidence our customers have in us as an organisation. In order that we can achieve this we do request that any complaints are first brought to our attention so we can properly investigate matters; if however you would like to complain about Scott Prenn to a supervisory authority you may do so by contacting the Information Commissioners Office on 0303 123 1113, or by any of the other reporting methods listed on their website - <a href="https://ico.org.uk/concerns">https://ico.org.uk/concerns</a>

## Our contact details

If you wish to get in touch with Scott Prenn please do so with any of the following contact details:

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London
SW7 3SS

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info@scottprenn.com