

## Privacy Policy

### Background

We want you, or the entity you are authorised to represent (“you”, or “your”) to visit our website knowing that you have control over your personal data. Your right to privacy and data security is a primary concern and we will take all reasonable measures to protect your information while it is in our care.

We respect and value the privacy of everyone who visits this website, [www.a2fcornwall.co.uk](http://www.a2fcornwall.co.uk) (“our site”) and will only collect and use personal data in ways that are described here, and in a manner that is consistent with Our obligations and your rights under the law.

This policy explains the data processing practices of [www.a2fcornwall.co.uk](http://www.a2fcornwall.co.uk). By submitting identifying data when using the website, you are agreeing to our use of such data as described in this privacy policy. Should you have questions concerning your personal information or any questions on our use of the information, feel free to direct these to [info@a2fcornwall.co.uk](mailto:info@a2fcornwall.co.uk).

### Information About Us

Our site is owned by Oxford Innovation Services Ltd, a limited company registered in England under company number 07860991, whose registered address is:

Oxford Centre for Innovation  
New Street  
Oxford  
OX1 1BY

Delivering services as Oxford Innovation Services.

Our VAT number is 844286704.

Our Data Protection Manager is Paula Brand, who can be contacted by email at [p.brand@sqwgroup.com](mailto:p.brand@sqwgroup.com), by telephone on 01865 261480, or by post at Oxford Centre for Innovation, New Street, Oxford OX1 1BY.

### What does this policy cover?

This Privacy Policy applies only to your use of our site. Our site may contain links to other websites. Please note that we have no control over how your data is collected, stored, or used by other websites and we advise you to check the privacy policies of any such websites before providing any data to them.

### What personal data do we collect

Depending upon your use of our site, we may collect some or all the following personal [and non-personal] data (please also see section our use of Cookies):

- Personal identification such as name and date of birth.
- Contact information such as email addresses and telephone numbers;
- Demographic information such as post code, preferences, and interests;
- Financial information
- Online identification such as IP address;

### How do we use your data?

All personal data is processed and stored securely, for no longer than is necessary in light of the reason(s) for which it was first collected. We will comply with our obligations and safeguard your rights under GDPR at all times.

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Our use of your personal data will always have a lawful basis, either because it is necessary for our performance of a contract with you, because you have consented to our use of your personal data (e.g. by subscribing to emails), or because it is in our legitimate interests. Specifically,

We may use your data for the following purposes:

- Providing and managing your Account;
- Supplying our services to you (please note that we require your personal data in order to enter into a contract with you);
- Personalising and tailoring our services for you;
- Replying to emails from you;
- Supplying you with emails that you have opted into (you may unsubscribe or opt-out at any time by clicking the unsubscribe link in the email)
- Analysing your use of Our Site and gathering feedback to enable us to continually improve our site and your user experience;

With your permission and/or where permitted by law, we may also use your data for marketing purposes which may include contacting you by email AND/OR telephone AND/OR text message AND/OR post with information, news and offers on Our services. We will not, however, send you any unsolicited marketing or spam and will take all reasonable steps to ensure that we fully protect your rights and comply with Our obligations under the GDPR and the Privacy and Electronic Communications (EC Directive) Regulations 2003.

You have the right to withdraw your consent to us using your personal data at any time, and to request that we delete it.

### How long do we keep your personal data?

We do not keep your personal data for any longer than is necessary in light of the reason(s) for which it was first collected. Data will therefore be retained for the following periods (or its retention will be determined on the following bases):

- General enquiries - completion of enquiry plus 6 months.
- Projects – specifically defined for each project and held within the processing activity record
- Visitor – duration of your visit

### How and where we store your data

We only keep your personal data for as long as we need to in order to use it as described above in the section titled 'How long do we keep your personal data?', and/or for as long as we have your permission to keep it.

Data security is very important to us, and to protect your data we have taken suitable measures to safeguard and secure data collected through our site.

### Do we share your data?

We never share your data with third party marketing companies.

We may share your data with other companies in our group to offer beneficial services. This includes Oxford Innovation Services AND/OR Our holding company and its subsidiaries.

We may sometimes contract with third parties to supply services to you on our behalf. These may include payment processing, search engine facilities, advertising, and marketing. In some cases, the third parties may require access to some or all of your data. Where any of your data is required for such a purpose, we will take all reasonable steps to ensure that your data will be handled safely, securely, and in accordance with your rights, our obligations, and the obligations of the third party under the law.

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We may compile statistics about the use of Our Site including data on traffic, usage patterns, user numbers, sales, and other information. All such data will be anonymised and will not include any personally identifying data, or any pseudonymised data that can be combined with other data and used to identify you. We may from time to time share such data with third parties such as prospective investors, affiliates, partners, and advertisers. Data will only be shared with your consent and used within the bounds of the law.

We may sometimes use third party data processors that are located outside of the European Economic Area (“the EEA”) (The EEA consists of all EU member states, plus Norway, Iceland, and Liechtenstein). Where We transfer any personal data outside the EEA, we will take all reasonable steps to ensure that your data is treated as safely and securely as it would be within the UK and under the GDPR including:

Third Party	Measures in place
Eventbrite	Privacy Shield
Mailchimp	Monitored by TRUSTe, and certified compliance with the EU - U.S./Swiss - U.S. Privacy Shield Frameworks.

In certain circumstances, we may be legally required to share certain data held by us, which may include your personal data, for example, where we are involved in legal proceedings, where we are complying with legal requirements, a court order, or a governmental authority.

### What Happens If Our Business Changes Hands?

We may, from time to time, expand or reduce Our business and this may involve the sale and/or the transfer of control of all or part of Our business. Any personal data that you have provided will, where it is relevant to any part of Our business that is being transferred, be transferred along with that part and the new owner or newly controlling party will, under the terms of this Privacy Policy, be permitted to use that data only for the same purposes for which it was originally collected by Us.

In the event that any of your data is to be transferred in such a manner, you will be contacted in advance and informed of the changes. When contacted you will be given the choice to have your data deleted or withheld from the new owner or controller.

### How Can You Control Your Data?

You have the right to ask for a copy of any of your personal data held by us (where such data is held) Under the GDPR. Any reasonable request is free of charge and we will provide any and all information we hold. Please contact us for more details at [gdp@sqwgroup.com](mailto:gdp@sqwgroup.com) or using the contact details below. We want to make sure the information we hold on you is correct. To update your information please contact [info@a2fcornwall.co.uk](mailto:info@a2fcornwall.co.uk), or using the contact details below.

### Your Right to Withhold Information

You may access certain areas of our site without providing any data at all. For certain services provided by us, you may be asked for your contact details. You may restrict Our use of Cookies. For more information, see Our Use of Cookies section.

### Your right to be forgotten

We only hold the minimum amount of personal data required for our processing and for a limited amount of time. However, you have the right to request that we remove or delete your personal data from our processing. Please contact Us for more details at [info@a2fcornwall.co.uk](mailto:info@a2fcornwall.co.uk), or using the contact details below in Contact Us section

### How Can You Access Your Data?

## Privacy Policy

You have the right to ask for a copy of any of your personal data held by us (where such data is held). Under the GDPR, no fee is payable and we will provide any and all information in response to your request free of charge.

Please contact Us for more details at

gdpr@sqwgroup.com

or using the contact details below in the 'Contacting Us' section.

### Our Use of Cookies

Our site may place and access certain first party Cookies on your computer or device. First party Cookies are those placed directly by us and are used only by us. We use Cookies to facilitate and improve your experience of our site and to provide and improve our services. We have carefully chosen these Cookies and have taken steps to ensure that your privacy and personal data is protected and respected at all times.

By using our site you may also receive certain third party Cookies on your computer or device. Third party Cookies are those placed by websites, services, and/or parties other than Us. Third party Cookies are used on our site for collecting anonymous information such as the number of visitors to the site, and the most popular pages.

These Cookies are not integral to the functioning of our site and your use and experience of our site will not be impaired by refusing consent to them.

All Cookies used by and on our site are used in accordance with current Cookie Law.

Before Cookies are placed on your computer or device, you will be shown a prompt requesting your consent to set those Cookies. By giving your consent to the placing of Cookies you are enabling us to provide the best possible experience and service to you. 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. You will be given the opportunity to allow only first party Cookies and block third party Cookies.

Certain features of our site depend on Cookies to function. Cookie Law deems these Cookies to be "strictly necessary". These Cookies are shown below. Your consent will not be sought to place these Cookies, but it is still important that you are aware of them. You may still block these Cookies by changing your internet browser's settings, but please be aware that our site may not work properly if you do so. We have taken great care to ensure that your privacy is not at risk by allowing them.

The following first party Cookies may be placed on your computer or device:

Name of Cookie	Purpose	Strictly Necessary
Strictly Necessary Cookies	Strictly Necessary Cookie should be enabled at all times so that we can save your preferences for cookie settings. If you disable this cookie, we will not be able to save your preferences. This means that every time you visit this website you will need to enable or disable cookies again.	Yes
Additional Cookies	This website uses the following additional cookies: Google Analytics, Wordpress	Yes

and the following third party Cookies may be placed on your computer or device:

Name of Cookie	Provider	Purpose
wordpress_test_cookie	WordPress	Tests whether or not the browser has cookies enabled

Our site uses analytics services provided by Google Analytics. Website analytics refers to a set of tools used to collect and analyse anonymous usage information, enabling us to better understand how our site is used. This, in turn, enables us to improve our site and the services offered through it. You do not have to allow us to use these Cookies, however whilst our use of them does not pose any risk to your privacy or your safe use of our site, it does enable us to continually improve our site, making it a better and more useful experience for you.

The analytics service(s) used by our site use(s) Cookies to gather the required information:

Name of Analytic service	First/ Third Party	Provider	Purpose
Google Analytics	Third party	Google Analytics	To collect anonymous information including the number of visitors the website receives, how visitors reach the website and the most popular pages

The analytics service(s) used by our site use(s) the following Cookies:

Name of Cookie	First/ Third Party	Provider	Purpose
_ga	Third Party	Google Analytics	Functioning of Google Analytics
_gid	Third Party	Google Analytics	Functioning of Google Analytics
_gat	Third Party	Google Analytics	Functioning of Google Analytics
_gat_gtag_UA-108377158-1	Third Party	Google Analytics	Functioning of Google Analytics

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 whether you wish to disable all cookies or only third party Cookies. By default, most internet browsers accept Cookies but this can be changed. For further details, please consult the help menu in your internet browser or the documentation that came with your device.

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.

It is recommended that you keep your internet browser and operating system up-to-date and that you consult the help and guidance provided by the developer of your internet browser and manufacturer of your computer or device if you are unsure about adjusting your privacy settings.

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### **Contacting Us**

If you have any questions about our site or this Privacy Policy, please contact us by email at [info@a2fcornwall.co.uk](mailto:info@a2fcornwall.co.uk), by telephone on 01872 300386, or by post at Access to Finance, Unit 1A (Ground Floor), Gateway Business Centre, Barncoose Gateway Park, Redruth, Cornwall TR15 3RQ. Please ensure that your query is clear, particularly if it is a request for information about the data We hold about you.

### **Changes to Our Privacy Policy**

We review this Privacy Policy regularly (for example, if the law changes and annually). Any changes will be immediately posted on our site and you will be deemed to have accepted the terms of the Privacy Policy on your first use of our site following the alterations. We recommend that you check this page regularly to keep up-to-date.