

## Data Pitch Privacy Policy

### Introduction

This privacy policy will inform you as to how we look after your personal data when you apply to one of our calls and tell you about your privacy rights and how the law protects you.

Please note, that the web application platform for our calls is run by F6S who have their own privacy policy. Please see their privacy policy for details on how your personal data is processed on the application platform.

Everyone has rights with regard to the way in which their personal information is handled. During the course of our calls we will collect, store and process personal information and we recognise that the correct and lawful treatment of this data will maintain confidence in our call process. It sets out the basis on which any personal information we collect from you, or that you provide to us, will be processed by us. Please read the following carefully to understand our views and practices regarding your personal information and how we will treat it.

For the purpose of UK data protection laws, the data controller is University of Southampton, RC000668, established in Highfield, Southampton SO17 1BJ, United Kingdom, represented by a Data Pitch Project Manager who can be contacted by email [info@datapitch.eu](mailto:info@datapitch.eu) or by phone on +44(0)2380 592386. The Data Protection Officer for the University of Southampton can be contacted by email on [data.protection@soton.ac.uk](mailto:data.protection@soton.ac.uk).

### Data protection principles

When processing your information, we must comply with the following principles of good practice. These provide that your personal information must be:

- processed lawfully, fairly and in a transparent manner;
- processed for specified, explicit and legitimate purposes;
- adequate, relevant and limited to what is necessary;
- accurate and kept up-to-date;
- kept for no longer than is necessary;
- processed in a manner than ensures appropriate security; and
- accountability of the data controller.

### Information you give to us

We may collect, use, store and transfer different kinds of personal information about you, including:

- **Identity Data**, such as your name, username or similar identifier, marital status, title, date of birth, gender, place of employment,
- **Contact Data**, such as your work address, email address and telephone numbers,
- **Technical Data**, including IP addresses, your log-in data, browser type and version, time-zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access our website,
- **Profile Data**, such as your username, password, feedback and survey responses,

- **Usage Data**, including information about how you use our website, products and services, and
- **Marketing Data**, such as your preferences in receiving marketing from us and our third parties, and your communication preferences.

### **‘Special category’ data**

Information relating to your racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, health, criminal convictions, sex life or sexual orientation, or certain types of genetic or biometric data is known as ‘special category’ data.

During the course of dealing with you, we do not expect to collect any ‘special category’ data about you.

### **How we collect your personal information**

We may obtain personal information by directly interacting with you, such as you:

- registering your interest for one of our calls;
- downloading sample data for one of our competition applications;
- submitting an application for one of our calls;
- participating in discussion boards or other social media functions on our website;
- providing us with feedback on a promotion or survey organised by us;
- subscribing to our services or publications, or otherwise requesting marketing material to be sent to you; or
- corresponding with us by phone, email, letters or otherwise.

We may obtain personal information via automated technology when you interact with our website by using cookies, server logs and other similar technologies.

We may also collect personal information about you from third parties or publicly-available sources, such as:

- analytics providers (such as Google Analytics),
- advertising networks,
- search information providers
- providers of technical, payment and delivery services,
- Companies House, LinkedIn and the electoral register,
- the application submission platform (F6S), and
- sample data platform (Dawex)

### **How we use your personal information**

We will only use your personal information when the law allows us to. Most commonly, we will use your personal information in the following circumstances:

- you have given us consent;
- we need to perform a contract we are about to enter into, or have entered into, with you;

- where it is necessary for our or a third party's legitimate interests, and your interests and rights do not override those interests; or
- where we need to comply with a legal or regulatory obligation.

We will only use 'special category' information:

- provided we have your explicit consent to use it;
- where we believe that we need to use that data to protect your vital interests where you are not able to provide us with your explicit consent;
- where it is necessary for reasons of substantial public interest;
- where you have previously made that data public knowledge; or
- if we need to use that data to establish, exercise or defend legal claims.

### Purposes for which we will use your personal information

We may use your personal information for a number of different purposes. For each purpose, we are required to confirm the 'legal basis' that allows us to use your information, as follows:

<b>Purposes for which we will use the information you give to us</b>	<b>Legal basis</b>
To notify you about changes to our terms or this privacy policy.	It will be necessary for our legitimate business interests, namely to ensure you are aware of our current terms and conditions.
To administer our website and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes, to allow you to participate in interactive features of our service, when you choose to do so, to measure or understand the effectiveness of advertising we serve to you and others, and to deliver relevant advertising to you and to make suggestions and recommendations to you and other users of our website about goods or services that may interest you or them.	It will be necessary for our legitimate business interests to ensure you receive the best experience possible when accessing and using our calls website.
To enable you to provide us with feedback or complete a survey.	It will be necessary for our legitimate business interests, namely to help us develop the Data Pitch Project.
To provide you with information about other calls that you may be interested in.	Where you have previously received marketing communications from us, then it will be necessary for our legitimate business interests, namely to ensure you continue to receive communications that you have previously agreed to receive.  In all other cases, we will only do this if you

	give us your consent.
To process your application for one of our Data Pitch calls.	It will be necessary for the performance or set up a contract between you and us.
To invite you to events including but not limited to, workshops, hackathons and charity events.	<p>Where you have previously received marketing communications from us, then it will be necessary for our legitimate business interests, namely to ensure you continue to receive communications that you have previously agreed to receive.</p> <p>Where you specifically ask us to provide you with certain marketing communications, then it will be necessary for our legitimate business interests, namely to ensure we provide you with the communications that you have requested.</p> <p>In all other cases, we will only do this if you give us your consent.</p>
To run the accelerator programme	It will be necessary for the performance of the contract between you and us.
Where your application to a specific Data Provider Challenge is unsuccessful, to provide your contact details to the corresponding Data Provider.	We will only do this if you give us your consent.

We will only use your personal information for the purpose(s) 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 we need to use your personal information for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal information without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

### **What if you cannot or will not provide us with your personal information**

We require some information to assess whether you and your company are eligible to participate in one of our Data Pitch calls. If you do not provide us with that information, we will be unable to accept and process your call application.

If you do not give us consent to use your personal information to send you invitations to events and competitions that you may be interested in, we will not do so.

### **Disclosure of your information**

#### Data Providers

Where we are collaborating with another organisation for a competition and/or grant, we will identify that other organisation within the call guidance and/or contract. A Data Provider is a third party organisation unconnected to Data Pitch but which offers its data and to the Data Pitch accelerator.

In this case, we may share your information in respect of the call and/or grant with the Data Provider for the purposes of administering the call and accelerator, and developing the innovation ecosystem.

#### Data Pitch Partners

Data Pitch is funded by the European Commission's Horizon 2020 research and innovation programme and is being coordinated by the University of Southampton. However, information about applicants may be shared by the other Data Pitch Partners including:

- Beta-I;
- The Open Data Institute; and
- Dawex.

#### Other Parties

We may share your personal information with the parties set out below:

- providers of IT and system administration services to our business, including Dropbox, One Drive, Google Drive, Mentornity, Airtable and other online cloud providers;
- our professional advisers (including solicitors, bankers, auditors and insurers);
- HM Revenue & Customs, the Information Commissioner's Office, regulators and other authorities who require reporting of processing activities in certain circumstances; and
- analytics and search engine providers that assist us in the improvement and optimisation of our website.

We require all third parties to respect the security of your personal information and to treat it in accordance with the law.

#### **Where we store your personal information**

All information you provide to us is stored on secure servers. Your information will be stored on Google Drive, which has been approved by the European Commission to provide an equivalent level of protection to your personal data under the EU-US Privacy Shield. This means that your information will have a similar degree of protection to it as if it was within the European Union.

We will take all steps reasonably necessary to ensure that your data is treated securely, including taking the following safeguards:

- **Building entry controls.** The University implements security controls including card key access.
- **Secure lockable desks and cupboards.** Desks and cupboards are kept locked when not in use if they hold confidential information of any kind.
- **Methods of disposal.** Paper documents are disposed of by shredding in a manner that ensures confidentiality.
- **Firewalls.**
- **Encryption.**
- **Overseas transfers.** Whenever we transfer your personal information outside the European Union, we ensure a similar degree of protection is afforded to it by ensuring that we apply appropriate safeguards (either by transferring data only to recipients in countries approved by the European Commission, to recipients that are party to the EU-US Privacy Shield, or by using specific contracts approved by the European Commission).

If you are concerned about the levels of data security in any of those countries, please let us know and we will endeavour to advise what steps will be taken to protect your data when stored overseas.

Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal information, we cannot guarantee the security of your data transmitted to our website; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

### How long we will store your personal information

The length of time that we will store your data will depend on the 'legal basis' for why we are using that data, as follows:

Legal basis	Length of time
Where we use/store your data because it is necessary for the performance of the contract between you and us.	We will use/store your data for as long as it is necessary for the performance of the contract between you and us.
Where we use/store your data because it is necessary for us to comply with a legal obligation to which we are subject.	We will use/store your data for as long as it is necessary for us to comply with our legal obligations.
Where we use/store your data because it is necessary for our legitimate business interests.	We will use/store your data until you ask us to stop. However, if we can demonstrate the reason why we are using/storing your data overrides your interests, rights and freedoms, then we will continue to use and store your data for as long as it is

	necessary for the performance of the contract between you and us (or, if earlier, we no longer have a legitimate interest in using/storing your data).
Where we use/store your data because you have given us your specific, informed and unambiguous consent.	We will use/store your data until you ask us to not to.

To determine the appropriate retention period for personal information, we consider the amount, nature and sensitivity of the personal information, the potential risk of harm from unauthorised use or disclosure of your personal information, the purposes for which we process your personal information and whether we can achieve those purposes through other means, and the applicable legal requirements.

Retention periods may be updated from time to time by our Data Management Plan. If you require specific details about the retention periods, please contact us the contact details below.

## Your rights

You have various legal rights in relation to the information you give us, or which we collect about you, as follows:

- You have a **right to access the information** we hold about you free-of-charge, together with various information about why and how we are using your information, to whom we may have disclosed that information, from where we originally obtained the information and for how long we will use your information.
- You have the **right to ask us to rectify any information** we hold about you that is inaccurate or incomplete.
- You have the **right to ask us to erase the information** we hold about you (the 'right to be forgotten'). Please note that this right can only be exercised in certain circumstances and, if you ask us to erase your information and we are unable to do so, we will explain why not.
- You have the **right to ask us to stop using your information** where: (i) the information we hold about you is inaccurate; (ii) we are unlawfully using your information; (iii) we no longer need to use the information; or (iv) we do not have a legitimate reason to use the information. Please note that we may continue to store your information, or use your information for the purpose of legal proceedings or for protecting the rights of any other person.

- You have the **right to ask us to transmit the information** we hold about you to another person or company in a structured, commonly-used and machine-readable format. Please note that this right can only be exercised in certain circumstances and, if you ask us to transmit your information and we are unable to do so, we will explain why not.
- Where we use/store your information because it is necessary for our legitimate business interests, you have the **right to object to us using/storing your information**. We will stop using/storing your information unless we can demonstrate why we believe we have a legitimate business interest which overrides your interests, rights and freedoms.
- Where we use/store your data because you have given us your specific, informed and unambiguous consent, you have the **right to withdraw your consent** at any time.
- You have the **right to object to us using/storing your information for direct marketing purposes**.

If you wish to exercise any of your legal rights, please contact the Data Pitch Team by writing to the address at the top of this policy, or by emailing us at [info@datapitch.eu](mailto:info@datapitch.eu).

You also have the right, at any time, to lodge a complaint with the Information Commissioner's Office if you believe we are not complying with the laws and regulations relating to the use/storage of the information you give us, or that we collect about you.

### **Opting out of receiving marketing communications**

You can ask us to stop sending you marketing communications at any time by contacting the Data Pitch Team by writing to the address at the top of this policy, or by emailing us at [info@datapitch.eu](mailto:info@datapitch.eu).

### **Automated decision-making**

We do not use automated decision-making processes.

### **Changes to our policy**

Any changes we make to our policy in the future will be posted on our website: <https://datapitch.eu/> . Therefore, please check our website frequently to see any updates or changes to our policy.

### **Contact**

Questions, comments and requests regarding this policy are welcomed and should be addressed to the Data Pitch Team by writing to the address at the top of this policy, or by emailing us at [info@datapitch.eu](mailto:info@datapitch.eu) .