

# Privacy Notice

*June 2020*



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British International Investment respects your privacy. This privacy notice (**the notice**) is designed to give you information about how your personal data is collected and used, when it is processed by or on behalf of British International Investment plc, its affiliated companies and subsidiaries (hereinafter together referred to as **BII**). This notice also tells you about how your personal data is protected and about your privacy rights.

The scope of this notice also includes all the websites, applications, mobile sites, and social media platforms that are owned by BII, where personal data is processed. If you choose not to provide us with your personal information, in most cases, we will not be able to provide you with our services or information about them.

BII may amend this notice at any point in time. Please check this notice periodically at [www.bii.co.uk](http://www.bii.co.uk) to inform yourself of any changes.

## 1. The types of information we collect

When you interact with us, or our website we may collect use, store and transfer different kinds of personal data about you. Generally speaking, we will collect the following categories of information relating to you and/or your use of our services (see paragraphs 1.1 to 1.13 for additional information).

- a) identity and contact information** – such as name, email address, telephone number, identification/KYC documents;
- b) events data** – this may include information necessary to coordinate your booking or attendance, or photos or recordings taken at our events;
- c) website usage** – if you use our website we will typically collect certain technical data including your internet protocol (IP) address, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other details about the devices you use to access this website;
- d) marketing and communications preferences** - if you have consented to us sending you marketing communications about our services;
- e) communications with you** – if you contact us, we will typically keep a record of that correspondence;
- f) information relating to the recruitment processes** – such as information contained in your application, references, assessments, offer documentation and associated documents;
- g) information relating to investments** – such as information contained in or relating to your proposal and supporting documents;
- h) information related to The Index** – information used to build your profile such as identity and contact information about your company and employees, and references from your former clients.

## 2. The legal bases we rely upon to process your personal data

We set out below the purposes for which we use the personal data that we collect about you, with the legal basis that we rely upon for its use.

The “legal bases” are set out in data protection laws: they allow companies to process personal data only when the processing is permitted by the specific “legal basis” set out in law. These grounds include:

- **Consent:** where you have consented to our use of your information.
- **Contract performance:** where your information is necessary to enter into or perform our contract with you (or to take steps at your request before entering into such a contract).
- **Legal obligation:** where we need to use your information to comply with our legal and regulatory obligations.
- **Legitimate interests:** where we use your information to achieve a legitimate interest and our reasons for using it outweigh any prejudice to your data protection rights.
- **Legal claims:** where your information is necessary for us to defend, prosecute or make a claim against you, us or a third party.

We have identified the relevant legal bases for each type of processing activity in Section 3. However, in summary, we generally rely on our legitimate interests to process your personal data in connection with our ongoing relationship with you and the fulfilment of the processing purposes identified in this notice. We may however process your personal data when:

- it is necessary to enter into or perform a contract with you;
- we are subject to a legal obligation to do so; or
- we are required to collect your consent for a processing activity.

To the extent that we rely upon your consent (for example where required for processing special category personal data, sending marketing communications or cookie placement purposes) as the legal basis under which we process your personal data, you are entitled to withdraw your consent, at any time. Please contact us if you want to do so.

### 3. How we collect and use information

#### 3.1. Visitors to our websites

When you visit our website, we collect IP addresses, cookies, moments of connection. These are analysed by Google Analytics, who collect standard internet log information and details of visitor behaviour patterns. We do this to identify the number of visitors to the various sections of the site. This information is not used to identify anyone.

BII does not make any attempt to discover the identities of visitors to our website.

For further information about our use of cookies and on how to decline them, please consult our [cookies policy](#).

Legal basis: your consent (for the use of cookies) and our legitimate interests (to allow us to improve our services)

### 3.1.1. Newsletters

We will collect your name and email address if you choose to subscribe to our newsletter. We use a third party email marketing service to deliver our monthly e-newsletters. We gather statistics around email opening and clicks using industry standard technologies including clear gifs to help us monitor and improve our e-newsletter.

Legal basis: your consent

### 3.1.2. General enquiries

When you submit an enquiry by email, telephone or post, we will collect your email address, phone number or postal address (depending on your method of enquiry) and comments and your first name, surname and the nature of the request if you choose to provide us with this information. Where enquiries are submitted to us we will only use your personal data to deal with the enquiry, any subsequent issues and to check on the level of service we provide.

Legal basis: contract performance and our legitimate interests (to enable us to perform our obligations and respond to your enquiries)

### 3.1.3. Events

The name and email that you provide will be used to process your event booking. We will also use it to contact you via a third party events management website regarding your booking. We may also contact you to undertake post-event evaluation if you choose to participate in this.

Legal basis: contract performance and our legitimate interests (to allow us to improve our services)

### 3.1.4. Investment proposals

When you submit an investment proposal, we will collect your first name, surname, email address, comments and any attached documents you choose to provide us with. We will only use the information supplied to us to review the proposal, interact with the submitter throughout the review process, and to provide a final response.

Legal basis: contract performance

## 3.2. People who participate in our surveys

We may contact you to participate in optional surveys from time to time. We will only do this if we have your consent or another lawful basis to do so. We use a third-party online survey provider to deliver, manage and produce reports relating to the survey. We may collect names, contact details and other information relevant to the survey. We will be transparent when we collect personal data through our surveys, will explain the purposes for which we are collecting it and will only collect the minimum amount of information required for the purposes of the particular survey.

Legal basis: your consent and our legitimate interests (to allow us to improve our services)

### **3.3. People who call our contact points**

When you call BII, we collect Calling Line Identification (CLI) information which may include your telephone number. We use this information to help improve our efficiency and effectiveness. We do not record phone conversations.

Legal basis: our legitimate interests (to allow us to improve our services)

### **3.4. People who email us**

When you send an email to us we may collect your IP address, email address and other data you have provided within the email or attachments. The information will only be used to address the purposes of your request, it will be recorded in our email and email security systems and may be recorded in a ticketing system to manage and respond to the request.

We use Transport Layer Security (TLS) to encrypt and protect email traffic in line with security best practices. If your email service does not support TLS, you should be aware that any emails we send or receive may not be protected in transit.

We will also monitor any emails sent to us, including file attachments, for viruses or malicious software. Please be aware that you have a responsibility to ensure that any email you send is within the bounds of the law.

Legal basis: contract performance and our legitimate interests (to allow us to improve our services)

### **3.5. People who make a complaint to us**

When we receive a complaint from a person we create a file containing the details of the complaint. This normally contains the identity (name, contact details, address of the person making the complaint and any other individuals involved in the complaint.

We will only use the personal information we collect to handle the complaint and to check on the level of service we provide.

We may have to disclose the person who submitted the complaint's identity to whoever the complaint is about.

If the person who submitted the complaint doesn't want information identifying them to be disclosed, we will try to respect that. However, it may not be possible to handle a complaint on an anonymous basis.

We will keep personal information contained in complaint files in line with our record and retention policy. It will be retained in a secure environment and access to it will be restricted according to the 'need to know' principle.

Legal basis: complying with our legal obligations and our legitimate interests (to allow us to improve our services)

### 3.6. Identity data and verification of identity

In some instances, we will need to verify your identity (e.g. access requests, know your customer (KYC), for other screening purposes, visiting our premises). We will always be transparent and explain the purposes for collecting identity data from you prior to processing.

Identity data can include: IDs assigned by us, passport, driving license, or a copy of ID (passport, driver's licence or comparable identity document), utility bills.

This data will only be used for verification of identity relating to the purposes it was requested for. When visiting our premises, we may be required to share your data with our building manager for the purpose of granting access.

Legal basis: contract performance and complying with our legal obligations

### 3.7. Use of personal data for electronic direct communication purposes in relation to:

#### (a) Stakeholder communications

We will only use your personal data to send out stakeholder communications via electronic means (e.g. email, SMS or MMS) if we have obtained your prior consent or have another lawful basis to do so. You can withdraw your consent or object to stakeholder communications at any point in time, by following the unsubscribe instructions included in the communications or by contacting the DPO at [dataprotection@bii.co.uk](mailto:dataprotection@bii.co.uk).

Legal basis: your consent or our legitimate interests (to contact you about our updates within our business)

#### (b) Our relationship with you

We will use your personal data to send you service communications via electronic means (e.g. email, SMS or MMS) that are necessary for us to fulfil our contract with you and provide you with our services. If you object to receiving these service communications, it may prevent us from providing our services to you.

Legal basis: contract performance

### 3.8. Photos and videos at BII events

At special events organised by BII we may take photos and videos of you. This includes image recordings such as films, photographs, video recordings, digital photos. We will provide notice to you of this fact at each BII event and provide you with the opportunity both prior to the event to opt-out of any photos and videos taken by us and after the event to not be featured in any of BII's online content, social media, films, marketing and/or press releases. If you do not wish to be photographed or filmed at any BII event, please notify us prior to the event by emailing [communications@bii.co.uk](mailto:communications@bii.co.uk).

Legal basis: your consent

### **3.9. Personal data we receive from third parties**

We may obtain personal data about you from third parties, other British International Investment companies, carefully selected business partners who provide services on behalf of us, and any other third party who may lawfully pass to us information about you.

### **3.10. Personal data collected through the recruitment process**

We will collect various information from you through our recruitment process. This is detailed below:

#### **Application**

If you use BII's online application system, this will be collected by a third party provider of recruitment services on BII's behalf.

We will ask you for your personal details including name and contact details. We will also ask you about your previous experience, education, referees and for answers to questions relevant to the role you have applied for.

Our recruitment team will have access to all this information.

You will also be asked to provide optional equal opportunities information. This is not mandatory information – if you don't provide it, it will not affect your application. This information will not be made available to any staff outside of our recruitment team, including hiring managers, in a way which can identify you. Any information you do provide, will be used only to produce and monitor equal opportunities statistics.

#### **3.10.1. References**

When providing references via our online reference system these will be collected by a third party reference provider on our behalf.

#### **3.10.2. Shortlisting**

Our hiring managers shortlist applications for interview. They will not be provided with your name or contact details or with your equal opportunities information if you have provided it.

#### **3.10.3. Assessments**

We might ask you to participate in assessment days, complete tests or complete occupational questionnaires, and/or to attend an interview – or a combination of these. Information will be generated by you and by us. For example, you might complete a written test or we might take interview notes. This information is held by BII.

If you are unsuccessful following assessment for the position you have applied for, we may ask if you would like your details to be retained in our talent pool for a period of six months. If you say yes, we would proactively contact you should any further suitable vacancies arise.

#### 3.10.4. Conditional offer

If we make a conditional offer of employment we will ask you for information so that we can carry out pre-employment checks. You must successfully complete pre-employment checks to progress to a final offer. We are required to confirm the identity of our staff, their right to work in the United Kingdom and seek assurance as to their trustworthiness, integrity and reliability.

You will therefore be required to provide:

- Proof of your identity – you will be asked to attend our office with original documents, we will take copies.
- Proof of your qualifications – you will be asked to attend our office with original documents, we will take copies.
- You will be asked to complete a fitness and proprietary declaration including a criminal records declaration to declare any unspent convictions.
- We will contact your referees, using the details you provide in your application, directly to obtain references
- We will also ask you to complete a questionnaire about your health. This is to establish your fitness to work. This is performed through a third party occupational health services provider.

If we make a final offer, we will also ask you for the following:

- Bank details – to process salary payments
- Emergency contact details – so we know who to contact in case you have an emergency at work
- Membership of a pension scheme – so we can help you determine whether you are eligible to re-join your previous scheme.

**Legal basis: contract performance, complying with our legal and regulatory obligations, your consent (for equal opportunities monitoring purposes) and our legitimate interests (in evaluating your application, ensuring we recruit the appropriate employees, to evaluate and maintain the efficacy of our recruiting process more generally)**

#### 3.11. People who register as part of The Index

When you become part of The Index, as well data about your company, we also collect and store personal data such as you and your employees' names, email address and phone number. We also will store references that you have supplied from your former clients on the work you upload on your profile.

We will use your information to:

- Create your profile on The Index website

- Share your contact details with our users who would like to contact you about future projects

We will share your information with all registered users of The Index. Your data will be stored in the digital database for The Index, which is hosted by a cloud services provider. We may store your personal data within the cloud which is used by BII to provide IT services, including email, and our email security and backup provider which will also process your data. When subscribing to our service we will use a third party mailing provider and online survey provider to send our communications and to manage your contact details and perform surveys on The Index from time to time.

Legal basis: our legitimate interests

### 3.12. People who are appointed to boards as BII's nominees or who act as advisors

Where you are approached or apply to act on a board or as an advisor for BII, we will require certain information to verify your identity and qualification to hold such office. The information that you provide will be shared with the relevant company to which you will be appointed in advance of and in connection with your appointment.

The information that you provide may comprise the following:

- Your contact details – these will include your email and residential address
- Your date of birth
- Proof of your identity – you may be asked to provide certified copies of your identification documents.
- Your curriculum vitae and proof of your qualifications – where relevant, you may be asked to provide certified copies.
- You may be asked to complete a fitness and proprietary declaration including, where relevant, a criminal records declaration to declare any unspent convictions.
- Where relevant, we will contact your referees, using the details you provide to us, directly to obtain references.
- You may be asked to provide other personal information in line with relevant law or regulation in the jurisdiction of the company to which you will be appointed.

Legal basis: contract performance and complying with our legal obligations

### 3.13. Other uses

In addition to the above BII may collect and process your information where we have obtained your consent or another lawful basis to do so, including:

- **Accounts:** including keeping accounts relating to any business and activity carried out by BII and keeping records of purchases, sales and transactions;

- **Safety and security:** any method, system or process used by BII to protect its physical and intellectual property, to protect its economic and financial interests and to protect the integrity of its directors, employees, investees and stakeholders.
- **IT support and development:** including processing as part of security event logging and monitoring of systems, business continuity planning and disaster recovery.
- **Compliance and legal claims:** including ensuring compliance with legal obligations or establishing, exercising or defending legal claims;
- **Scientific, historical and statistical research:** including the collection and processing of personal data for statistical surveys (or necessary to reach statistical results), analysing earlier events, and establishing patterns and rules of conduct;
- **Mergers and acquisitions:** To prepare for and carry out a merger, take-over, transfer of an undertaking, transfer of assets or any other type of corporate transaction; and
- **Any other purpose** described and communicated to you prior to using your personal data for such other purpose.

BII will only process your personal data to achieve the purposes it was collected for, or for any other legitimate and lawful purpose.

BII will notify the processing of personal data to the relevant authorities to the extent required under all applicable data protection laws and regulations.

#### 4. Data Accuracy

It is important for us to maintain accurate and up to date records of your personal data. Please inform us of any changes to or errors in your personal data as soon as possible by contacting the DPO at [dataprotection@bii.co.uk](mailto:dataprotection@bii.co.uk). We will take reasonable steps to make sure that any inaccurate or out-of-date data is deleted, destroyed or amended accordingly.

#### 5. Data Retention

We shall retain your personal data in a manner consistent with the applicable data protection laws and regulations. We will only retain your personal data for as long as necessary to comply with the applicable laws and regulations or for the purposes for which we process your personal data. For guidance on how long certain personal data is likely to be kept before being destroyed, please contact the DPO at [dataprotection@bii.co.uk](mailto:dataprotection@bii.co.uk).

#### 6. Data security

We shall ensure that appropriate technical and organisational security measures are taken against unlawful or unauthorised processing of personal data, and against the misuse, destruction, disclosure, acquisition, accidental loss of, or damage to personal data. Personal data shall only be processed by a third-party processor if they can demonstrate adequate compliance or certification to relevant information security standards and practices.

BII has implemented an information security management system to protect the confidentiality, availability and integrity of our assets, including protection of information processing facilities and your personal data.

## **7. How to contact us**

For any privacy issues, questions or complaints concerning the application of this notice or to exercise your rights within the context of this notice, you may contact BII at [dataprotection@bii.co.uk](mailto:dataprotection@bii.co.uk). Alternatively, you may write to us:

Data Protection Officer  
c/o Head of Compliance  
British International Investment plc  
123 Victoria Street  
London  
SW1E 6DE  
United Kingdom

## **8. Disclosure of personal data**

For the above-mentioned purposes, we may disclose your personal data to the following categories of recipients:

### **8.1. Categories of recipients**

- Authorised staff members of the British International Investment plc
- Corporate affiliates and subsidiary companies of the British International Investment – a full list of these, can be provided upon request;
- Business partners: trusted companies that may use your personal data to provide you with the services and/or the information you requested and/or that may provide you with communications (if you have consented to receiving them). We ask such companies to always act in compliance with applicable laws and this privacy notice and to pay high attention to the confidentiality of your personal data. A full list of our business partners can be provided upon request.

### **8.2. Service providers**

Service providers are a core part of our IT, communications and business strategy. BII may share your personal data with external providers of IT related services and communication agencies.

A full list of service providers can be provided upon request.

### **8.3. Other parties when required by law or as necessary to protect BII**

BII may share your personal data with other third parties:

- to comply with the law, regulatory requests, court orders, subpoena, or legal process;

- to verify or enforce compliance with BII's policies and agreements; and
- to protect the rights, property or safety of BII and/or its clients.

#### **8.4. Other parties in connection with corporate transactions:**

BII may share your personal data with other third parties in the context of a divestiture of all or a portion of its business, or otherwise in connection with a merger, consolidation, change in control, reorganisation or liquidation of all or part of BII's business.

#### **8.5. Other parties with your consent or upon your instruction:**

BII may share your personal data with:

- third parties when you consent to or request such sharing; and
- Any other third party communicated to you by BII prior to sharing your personal data with that third party.

### **9. Use of social networks**

BII sometimes facilitate the publication of personal data (and other information) via social media such as Twitter and Facebook. These social media platforms have their own terms of use and privacy notices which you are required to consider and observe if you make use of them. Publication on social media may have (undesired) consequences, including for your privacy or that of persons whose data you share, such as the impossibility of withdrawing publication in the short term. You must consider these consequences yourself as BII does not accept any responsibility in that regard.

### **10. Disclosures outside the EEA**

Your personal data may be transferred to any of the recipients identified in this notice, some of which may be outside the EEA (and the United Kingdom ("UK"), following the withdrawal of the UK from the European Union) and may be processed by us and any of these recipients in any country worldwide. The countries to which your personal data is transferred may not offer an adequate level of protection. In connection with any transfer of personal data to countries that do not offer the same level of protection as in the EEA, BII shall implement appropriate measures to ensure an adequate level of protection of your personal data. For more information about where we may transfer your information and how we make sure your information is protected, please contact us at [dataprotection@bii.co.uk](mailto:dataprotection@bii.co.uk).

### **11. Your choices and your rights**

We want to be as transparent as possible with you, so that you can make meaningful choices about how you want us to use your information.

#### **11.1. Your choices**

In this context, you can make a variety of choices about how you want to keep in touch with us, through which channel (e.g. email, mail, social media, etc.), for which purpose and how frequently,

by contacting us at [dataprotection@bii.co.uk](mailto:dataprotection@bii.co.uk) or by following the unsubscribe instructions included in the communication. Please note, if we have an ongoing relationship with you, you may continue to receive marketing communications from us you have the right to object to receiving these communications (other than essential service communications) at any time.

## 11.2. Your rights

You have rights (with some exceptions and restrictions) to:

- object to our processing of your personal data, including profiling. You can object, on grounds relating to your particular situation, at any time. In which case, we shall stop processing the data that your objection relates to, unless we can show compelling legitimate grounds to continue that processing;
- access your personal data. If you make this kind of request and we hold personal data about you, we are required to provide you with information on it, including a description and copy of the personal data and why we are processing it;
- request that we provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format;
- request erasure of your personal data in certain circumstances;
- request correction or updating of the personal data that we hold about you and that is inaccurate;
- request the restriction of our processing of your personal data in some situations. If you request this, we can continue to store your personal data but are restricted from processing it while the restriction is in place;
- to object to, and not be subject to a decision which is based solely on automated processing (including profiling), which produces legal effects or could significantly affect you; and
- complain to your local data protection authority or seek a judicial remedy from your national court about our collection or use of your personal data. For example, in the UK, the local data protection authority is the UK Information Commissioner's Office, although we would like the prior opportunity to respond to any complaint.

If you choose to exercise the rights described above, we may ask you to provide additional information so that we can satisfy ourselves as to your identity before we take further action.

If you would like to exercise any of these rights in relation to any information that we hold about you, please contact us. Our contact details can be found in section 7 of this Notice. We will consider and respond to your request in accordance with the relevant law.

## 12. Definitions

In this Definitions section, we explain some of terminology used in this notice.

- **BII** means British International Investment plc, its affiliated companies and subsidiaries.
- **Controller** means the organisation which determines the purposes for which, and the way, any personal data is processed. For the purposes of this notice, the controller(s) are BII and each of the British International Investment companies listed in Appendix A.
- **Data Protection Officer** or **DPO** means the data protection officer appointed by BII in the relevant jurisdiction.
- **Data subjects** means all individuals about whom BII holds personal data.
- **Personal data** is any data relating to a living individual which allows the individual to be identified, whether from the data alone, or in combination with other information.
- **Processing** means any operation or set of operations which is performed upon personal data, such as the collection, recording, organization, storage, adaption or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, blocking, erasure or destruction of personal data.
- **Processor** means the individual and/or organisation which processes personal data on behalf of the Controller.
- **Sensitive personal data** means personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, trade-union membership, data concerning health, sexual orientation or sex life. Special provisions apply to the processing of sensitive personal data.



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 [Twitter @BritishIntInv](https://twitter.com/BritishIntInv)

British International Investment plc is authorised and regulated by the Financial Conduct Authority.

Registered address as above.

Registered in England No. 3877777