

Mint Ventures Privacy Policy

At Mint Ventures we take your privacy very seriously and are committed to protecting your personal information. This Privacy Policy sets out the basis on which any personal data we collect from you, or you provide to us, will be processed by us.

Who we are

Mint Ventures is a women-led angel investment network offering a fresh approach to investing. We support women to become angel investors and provide much needed capital to women entrepreneurs and companies with gender balanced boards.

Mint Ventures Syndicate Limited (company number: 644878) is a not-for-private-profit company, limited by guarantee, trading as Mint Ventures.

Mint Ventures is the “controller” of your personal information and is responsible for it. Through this Privacy Policy we aim to inform you about the types of personal data we collect, the purposes for which we use this data and the ways in which it is handled. Any reference to website is a reference to our website at www.mintventures.co.uk.

Contact details

Our data protection officer is Gillian Fleming.

If you have any questions regarding our Privacy Policy, please write to:

The Data Protection Officer
Mint Ventures
c/o Wright, Johnston & Mackenzie LLP
Capital Building
12-13 St Andrew Square
Edinburgh
EH2 2AF

We intend to cover in this Privacy Policy:

- The personal data we process, why and on what basis we process it
- How we collect and use the data
- The legal basis for processing it and when we might share it
- The data security measures we have in place
- How long we keep data
- Your rights over your data
- Cookies and tracking on our website
- Contact details of our data manager
- How to complain and updates on the Privacy Policy

The personal data we collect and how we collect it

Personal data is any information that can be used to identify you or that can be linked to you.

We collect information that you provide to us directly, such as your name, phone number, address and email address. This happens, for example, when you subscribe to one of our mailing lists, meet one of our directors or employees and share contact details, take part on any of our events or campaigns, communicate with us (online, by email, phone, SMS, social media or post), respond to one of our surveys or questionnaires. If you are an investor or potential investor, we may ask you to provide additional information, for example, about your investment preferences and experience; if you are an entrepreneur seeking to raise capital, we may ask you for further personal information about you in connection with your business for example occupation, experience and shareholding.

We may supplement the personal data you provide us with information about you that we receive from third parties and from data in the public domain, such as from open social networks (e.g. LinkedIn and Twitter), company websites, political and property registers, news archives, company and charity and CIC registers.

We also collect personal data automatically when you use the website and when you navigate through the website. Data collected automatically may include usage details, geo-location data, IP addresses and other data collected through cookies and other tracking technologies. For more information on our use of these technologies, see our Use of Cookies section below.

How we use the personal data

The principal purposes for which we process and store personal data relating to you are:

- To respond to your queries
- To provide and communication with you about the services we have contracted to provide
- To process payments in connection with the service provision
- In the case of entrepreneurs seeking capital, to verify and approve the disclosures you make in your approaches to potential investors
- In the case of investors looking to invest, to confirm that you are eligible to make investments in accordance with relevant legislation
- To monitor, improve and administer the website and the services provided on the website
- To enable us to conduct surveys and analysis, and aggregate user profiles.
- To provide you with information about our business, and on other selected products and services that we think may be of interest to you, where you have expressly consented to be contacted for such purposes
- To enable us to comply with our legal and regulatory obligations, including reporting to regulators and governmental authorities

- To enable us to comply with our commitments as signatories on the Investing in Women Code <https://www.gov.uk/government/publications/investing-in-women-code>
- To prepare anonymised data sets

Sensitive personal information

Data protection law identifies certain categories of personal information as sensitive and therefore requiring more protection. For example, information about health or ethnicity. Where appropriate we may also collect/use this information, but normally only where we have your explicit consent or data protection law allows it. We only aim to collect this type of information when we feel it is necessary in relation to your relationship with us.

Legal basis for processing personal data

The main grounds that we rely upon in order to process personal information are the following:

(a) Necessary for entering into, or performing, a contract – in order to perform obligations that we undertake in providing a service to you, or in order to take steps at your request to enter into a contract with us

(b) Necessary for compliance with a legal obligation – we are subject to certain legal requirements which may require us to process your personal data

(c) Necessary for the purposes of legitimate interests – either we, or a third party, will need to process your personal data for the purposes of our (or a third party's) legitimate interests, provided we have established that those interests are not overridden by your rights and freedoms, including your right to have your personal data protected. Our legitimate interests are ultimately in pursuit of our mission and include operations and administration such as responding to requests and enquiries from you or a third party, and optimising our website and customer experience; marketing and publicity such as informing you about our products and services and financial management and control such as processing payments

(d) Consent – in some circumstances, we may ask for and obtain your consent to process your personal data

When we might share personal data

Any personal data relating to you that is collected by Mint Ventures will be kept confidential and we will not disclose it or share it with any third parties. The only exceptions to this are: We may disclose certain personal data relating to you to third-party service providers solely in the course of their provision of services to us, and you acknowledge and agree that in doing so personal data relating to you may be transferred outside the European Economic Area ("EEA"). We may disclose certain personal data if we are required to do so by law, regulation or the order of court or other legitimate government body or arbitration panel. This includes, among other things, any personal data relating to you that may be requested by HM Revenue & Customs and the Financial Conduct Authority. We may also disclose personal data to third parties if we are under a duty to disclose or share personal data

relating to you in order to comply with any legal obligation, or in order to enforce or apply our Terms of Service and other agreements.

Before we disclose personal data to a third party, we take steps to ensure that the third party will protect personal data in accordance with applicable privacy laws.

For the avoidance of doubt, we will never sell to third parties personal data relating to you.

Data security

We take all reasonable steps to protect your personal data. We have put in place physical, technical and administrative measures to prevent unauthorised access or use of your information. However, we cannot guarantee the security of any personal data you disclose online. In using the website, you accept the inherent security implications of engaging in transactions online over the internet, and you agree that you will not hold us responsible for any breach of security unless we have been negligent.

How long we keep your data

We will keep your information for as long as it is reasonably necessary, in line with the reason for collecting and processing it. How long depends on factors such as your interactions with us and whether you have any contractual agreements in place with us. In general, we will only keep your contact information for as long as our interactions with you continue and for six years thereafter. After such a period, within our database, we anonymise records so we can reference behavioural patterns in our data analytics, but the information is no longer personal to you.

Your rights over your personal data

You have certain rights in relation to the personal data we hold. Details of these rights and how to exercise them are set out below. We will require evidence of your identity before we are able to act on any request to exercise these rights.

Right of access: You have the right at any time to ask us for a copy of the personal data about you that we hold. Where we have good reason, and if the GDPR permits, we can refuse your request for a copy of your personal information, or certain elements of the request. If we refuse your request or any element of it, we will provide you with our reasons for doing so.

The right to rectification: To have personal information amended if it is inaccurate or incomplete. You can ask us to check the personal data that we hold about you if you are unsure.

The right to erasure: In some cases, to have your personal information erased (or anonymised), including when consent is withdrawn, your information is being unlawfully processed or it is no longer necessary for us to process it.

The right to data portability: Where we are processing your information on the basis of consent, you can request it to be transferred from one service provider to another in a suitable format.

The right to object: You can ask us to stop processing your personal information in certain circumstances, including an absolute right to ask us to stop processing for direct marketing.
The right to restrict processing: If there is any disagreement about the accuracy or legitimate usage of your personal information, you can ask us to "hold" it but not use it further, whilst the issue is resolved.

Most of the above rights are subject to limitations and exceptions. We will provide reasons if we are unable to comply with any request for the exercise of your rights.

Complaints

If you want to enforce any of these rights in respect to your personal information, please contact: The Data Protection Officer, Mint Ventures, c/o Wright, Johnston & Mackenzie, Capital Building, 12-13 St Andrew Square, Edinburgh EH2 2AF or email us at info@mintventures.co.uk. You are also entitled to lodge a complaint with the UK Information Commissioner's Office at any time however, we would be grateful for the opportunity to address your concerns before you consider taking this step.

Use of cookies and tracking technology

We use cookies (defined below) for collecting user information from the website. Cookies are messages given to a web browser by a web server. The message is then stored by the browser in a text file called cookie.txt. Each time the browser requests a page from the server, this message is sent back. A cookie's main objective is to identify users and personalise their visit by customising web pages for them, for example by welcoming them by name next time they visit the same site.

We use cookies and tracking to understand how users use and behave on the website. Other websites which provide information about cookies and allow you to manage your privacy can be found at:

www.aboutads.info

optout.networkadvertising.org for US-based users

www.youronlinechoices.eu for users in the EU.

Changes to our Privacy Policy

This policy may change from time to time. If we make any significant changes to this policy, we will publicise these changes clearly on our website or contact you directly with more information.

This Privacy Policy was last updated on 12 August 2020.

Please revisit this policy each time you consider giving your personal information to Mint Ventures.

Further Information on Data Protection and Personal Privacy

If you have any enquiries or if you would like to contact us about our processing of your personal information, including to exercise your rights as outlined above, please contact us by any of the methods below.

When you contact us, we will ask you to verify your identity.

Contact Us

Contact name – Gillian Fleming

Email – info@mintventures.co.uk

Address: The Data Protection Officer

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