

Privacy Policy

This privacy policy summarises the key points about how West Midlands Development Capital Limited ("WMDC", "we" or "us") collects, stores and processes your personal data, your rights and how to contact us if you have any further questions.

Data Controller

WMDC (company number 10759485) is registered by the Information Commissioner's Office as a data controller under registration number ZA343364.

What Information We Collect About You

Only information necessary for the ongoing operation and future development of the business will be collected and held. This includes:

- Clients and prospective clients – information you give us when you engage with us and apply for funding.
- Employees and directors – personal information so that WMDC can discharge its employment.

How We Will Use The Information About You

Depending on the nature of the consent to hold information, WMDC will use it for one or more of the following purposes:

- To provide our funding services to you
- To provide data to funders
- To aid in the prevention and detection of fraud
- For registration and accreditation purposes
- Employee matters including payroll

This means that the legal basis for us processing your personal information described above will typically be the following:

- Because it is necessary to fulfil a contract that we have in place with you
- The processing is necessary for compliance with our legal obligations
- For our legitimate business interests

Who We Will Share Your Personal Information With

We will only share personal data with third parties where we are legally permitted to do so. We do not provide information to third parties for their own marketing purposes, and we do not undertake mailings for third parties. Where we transfer personal data to third parties, we will put in place appropriate arrangements and seek to ensure that there are appropriate technical and organisational measures in place to protect personal data.

We may provide personal data to:

- Third parties who provide IT services to support our business such as server maintenance, security and information back up, and cloud based software providers
- Payment service providers who provide services for sending and receiving payments
- Professional advisors who need it to provide advice and services to us
- Our funding partners
- Compliance and regulatory bodies, the police, the courts and any other central or local government bodies where they request it and we may lawfully disclose it, for example for the prevention and detection of crime
- Other people who make a subject access request to us, where we are allowed to do so by law

We also share the information we process where we are legally obliged to do so, for example to comply with a court order.

How We Store Your Personal Information

We only store your personal information in the UK and our suppliers do not send personal information outside the European Economic Area (EEA).

How Long We Store Your Personal Information

WMDC will only retain your personal information for as long as there is a lawful basis. Once that period has expired, we will make every effort to discard information no longer needed.

If you withdraw your consent and there is no lawful basis for us to retain it, then we will stop processing that personal information and delete or destroy it.

If we have anonymised your personal information or aggregated it in a way that you can no longer be identified from it, then we will continue to keep and use this anonymised information.

Cookies

With the use of cookies:

We may collect your IP address and other information about your computer for system administration. This is statistical data about our users' browsing actions and patterns and does not identify any individual. For the same reason, we may obtain information about your general internet usage by using a cookie file which is stored on the hard drive of your computer. Cookies enable us to estimate our audience size and usage pattern and store information about your preferences, and so allow us to customise the website according to your individual interests and recognise you when you return to the

website. We do not use cookies to track your use of the internet after you leave the website, nor do we store any personal information in them.

You may refuse to accept cookies by activating the setting on your browser which allows you to refuse the setting of cookies. However, if you select this setting, you may be unable to access certain parts of the website. Unless you have adjusted your browser setting so that it will refuse cookies, and you have accepted cookies via the cookie banner seen when you first visit our website, our system will issue cookies when you enter the website and you will be deemed to have consented to the use of such cookies.

Your Rights

You have certain rights in relation to your personal information. These include:

- The right to request access to your personal information ("a subject access request")
- To update your personal data held on our records
- To erase or restrict your personal information where it is no longer needed for the purpose it was obtained
- Where we rely on your consent to process your personal information, the right to withdraw consent to the processing of your personal information

You will not have to pay a fee to access your personal data or to exercise any of your other rights.

If you wish to exercise any of these rights, please write to us using the details set out in the "contacting us" section below with the subject line "personal information request".

In your request, please supply the following details:

- First name and surname
- Name of business
- Address and postcode
- Details of the right you wish to exercise, the information you seek or the amendments you wish us to make to our records
- Proof of identity – a document which contains a signature, such as a passport

This information will enable us to quickly identify and deal with your request.

Changes to our Privacy Policy

We regularly review our Privacy Policy and will publish any updates on our website.

Contacting us

If you have any questions or feedback about this Privacy Policy or would like to exercise your rights concerning your personal data, please get in touch with us:

Phone: 0345 319 4528

Email: info@westmidlandsdevelopmentcapital.com

Address: West Midlands Development Capital Limited, 45 Church Street, Birmingham, B3 2RT

We will do our very best to answer any questions and resolve any complaint to your satisfaction. If, however, you feel we do not meet your expectation you have the right to complain to the UK's supervisory authority – The Information Commissioner's Office (ICO), telephone 0303 123 1113.