



Sturgeon Ventures LLP

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Privacy Policy

STURGEON VENTURES LLP PRIVACY POLICY

1. Collection of personal data

i. This website (the “**Website**”) is administered by Sturgeon Ventures LLP (“**SV**”). SV will only use personal data in accordance with the provisions set out in this Privacy Policy and in the Data

Protection Act 1998 and the Privacy and Electronic Communications Regulations 2003. This policy, which is part of, and is to be read in conjunction with, our **terms of business** sets out the basis on which any personal data you provide to us, by any means whatsoever, will be collected and processed, the purposes of such processing and how we safeguard your personal data.

ii. SV is registered with the Information Commissioner’s Office under registration number (**Confirm email ji@sturgeonventures.com**)

iii. When you visit the Website or telephone or email SV, we may collect and process personal information about you, including but not limited to, your full name and contact details such as email address, home address and telephone number, user names, passwords or any other personal information deemed necessary:

- a. when you register, log in or complete other online forms;
- b. when you respond to requests to submit personal information about yourself (if any);
- c. when you otherwise contact us and we may keep a record of that correspondence; or
- d. based on any other information we receive about your transactions from our files, our affiliates or another source whether involved in your transactions or otherwise.

Use of personal data

i. SV may collect and use information about visitors to the Website to conduct its business, including identify your requirements, delivering services and information which you have requested, promoting other services which may be of interest to you and collating web user statistics.

ii. We may also use it to contact you for your views on our services and events and to notify you occasionally about important changes or developments to the Website or our services, unless you have opted out of receiving such services as set out at paragraph 8.1 below.

iii. The personal information that we collect from you may be transferred to and stored at, a destination outside the European Economic Area (EEA). It may also be processed by staff operating outside the EEA who work for us, or a supplier. By submitting your personal details you agree to us transferring, processing and storing your personal information in this way.

Disclosure of Information

i. We take all reasonable care to prevent any unauthorised access to your personal data.

We may disclose your personal information to:

a. any member of our group, which means our subsidiaries, our ultimate holding company and its subsidiaries, as defined in section 736 of the UK Companies Act 1985;

b. our affiliates or professional advisers; or

c. where we need to send the information to persons or organisations who work on our behalf to provide a product or services to you, but such persons or organisations may only use this information in order to provide such product or service and not for any other purpose.

ii. We may also share or sell, as permitted by law, information to other companies who we believe may have products and services of interest to you. If you do not wish to receive information from us or from other sources, please follow the instructions at paragraph 8.1 below.

iii. We may also share this information about our visitors, customers or former customers to companies that perform marketing services on our behalf or with whom we have joint marketing agreements.

How we protect your data

i. SV takes all reasonable care to ensure the security of the Website and of your personal information from access by unauthorised persons and against unlawful processing, accidental loss, destruction and damage. We will not share your information other than as provided for in this Privacy Policy or as required by law, court order or other government or law enforcement authorities.

ii. The internet is not a secure medium, however and SV cannot guarantee the security of your information absolutely and you acknowledge that we may be subject to breaches of security through no fault of our own.

Cookies

i. We may track and process information and data in relation to your use of our Website using “cookies”. A cookie is a small file which is sent to your browser and stored on your computer’s hard disc and helps us understand and track your use of the Website and where we can improve the information and services provided.

ii. We use cookies solely to gather information on IP addresses and pages visited, to analyse trends, administer the Website, track users’ movements on the Website and gather broad demographic information for aggregate use. IP addresses are not linked to other personally identifiable information and will not be used to deliver targeted marketing messages.

iii. We do not disseminate this information to anyone but SV’s officers, employees and contractors.

iv. Most internet browsers allow you to stop receiving cookies via options/settings. You may enable these options/settings. However, this will mean that our system may not recognise your computer when you log in and so you may not be able to use or access certain parts of the Website. For information about cookies generally, please visit **www.allaboutcookies.org**

Links to other websites

i. This Website may contain links to other websites. This Privacy Policy extends only to this Website and does not cover your use of, provision of data to and collection of data on any website not connected to us which you may link to by using hypertext links within the Website.

ii. We recommend that you check the policy of each website that you visit and contact the owner or operator of that website if you have any concerns.

Changes

i. We may edit or amend this Privacy Policy from time to time. If we make any substantial changes to this policy, we will notify you by using a prominent notice on the home page of the Website.

ii. As a result of improvements we make to our services, amendments to laws or regulation or developments in the technology or processes we use, we may change the information we hold about you and/or the way in which or the purposes for which we process such information. If we make any substantial change in the way in which we use your personal information we will notify you.

Contact / unsubscribe

i. Questions, comments and requests regarding this Privacy Policy are welcomed and should be addressed to **info@sturgeonventures.com**

ii. From time to time, SV or third parties who we think have products or services of interest to you may send you e-mails, e-mail newsletters, or news updates alerting you to new features, products, promotions, or services pertaining to the Website. If you no longer wish to receive materials from us and/or from such third parties, you may opt-out of receiving these communications by writing to us at SV's address or by emailing us your request to 'unsubscribe' at **info@sturgeonventures.com**

This Policy was updated and reviewed on April 1st 2011