**St John’s Innovation Centre Ltd – Privacy Policy**

1. **Scope**

This privacy policy explains how we (St John’s Innovation Centre Ltd) use any personal information we collect about you. We hold personal data about our customers, employees and suppliers (known as “data subjects”) for a variety of business purposes and this falls within the scope of this policy and the requirements of the General Data Protection Regulation 2016 (‘GDPR’) effective from 25th May 2018.

1. **Responsibilities**

As detailed in our Data Protection Policy v1.0 the company’s Board of directors and staff are fully committed to ensuring full compliance to this regulation.

1. **Privacy Policy**

**Who are we?** At St John’s Innovation Centre, we manage the running of the St John’s Innovation Centre on behalf of St John’s College.

**Our Compliance Strategy:** Our systems are protected with password protection and operator rights, limiting the access to the data within the system. For the benefit of increased security, the systems are set to automatically log out an operator if the system is inactive for an extended period.

* 1. **What information do we collect about you?**

**For tenants, virtual tenants and conference customers** we collect information when you join the Centre, we keep this information securely either in locked cabinets or in our password protected systems. We only amend this information when we receive written (email accepted) instructions from you. On leaving the Centre we hold your information for twelve months until it is either deleted or shredded. Financial transactions relating to tenants are kept in line with HMRC guidelines. Tenant emergency contact information is held in our CRM system, password protected with limited staff access.

**For Consultancy clients** we collect personal information when you request to join our support programmes and hold this in secure, password protected systems and comply with other data protection policies under the relevant funding streams, which may include other data bases; these will also comply with the GDPR guidelines.

**For Intermediaries, Stakeholders, coaches, other interested parties,** we collect personal data only after obtaining permission from you to do so.

**For tenant out of hours emergency information**, Tenant emergency contact information is held in our CRM (Zoho) system, password protected with limited staff access.

**With regards to our tenant access control system** (Paxton Access Ltd) cards are programmed with employee name, car registration number and email address and managed by the Reception Administration team. We can set the system to report on information held for an individual, as well as permanently delete a tenant and all associated information if requested.

**3.2 How will we use the information about you?**

At St John’s Innovation Centre, we take your privacy seriously and will only use your personal information to administer your account and to provide our services you have requested from us. This information will not be shared with any third party. We will from time to time notify you about events, notices and newsletters relevant to the Centre.

**3.3 Access to your information and correction**

You have the right to request a copy of the information that we hold about you. If you would like a copy of some or all of your personal information, please contact us using the details below.

We want to make sure that your personal information is accurate and up to date. You may ask us to correct or remove information if you think it inaccurate.

**3.4 Changes to our Privacy Policy**

We will keep our privacy policy updated regularly as required but it will be reviewed annually in May. A copy of our privacy policy will be kept on our website under ‘About’.

**3.5 How to contact us**

**Stephanie Martlew**

Chief Operating Officer (nominated Data Protection Officer)

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This policy was last updated on the 1/2/2024.