



## Privacy Policy

Satellite Applications Catapult is part of a group of companies, of which Satellite Applications Catapult Limited is the ultimate owner (together 'Catapult'). The Catapult respects your privacy and is committed to protecting your personal data. This privacy policy will inform you as to how we look after your personal data and tell you about your privacy rights and how the law protects you.

This privacy policy is issued on behalf of the Catapult's group so when we mention "Catapult", "we", "us" or "our" in this privacy policy, we are referring to the relevant company in the group responsible for processing your data. Satellite Applications Catapult Limited is the ultimate controller and is responsible for the Website at [commonsensing.gov.uk](https://commonsensing.gov.uk) and its subdomains.

## The data we collect about you

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

- **Identity Data** includes first name, last name, username (or similar identifier) and organisation.
- **Contact Data** includes email address and telephone number.
- **Technical Data** includes 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 technology on the devices you use to access our Website.
- **Usage Data** includes information about how you use our Website, products and services.

## How your personal data is collected

We use different methods to collect data from and about you including through:

- **Direct interactions.** You may give us your Identity and Contact Data by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:
  - contact us with a query.
  - subscribe to our service or download publications.
  - give us some feedback.
- **Automated technologies or interactions.** As you interact with our Website, we may automatically collect Technical Data about your equipment, browsing actions and patterns. Please see our Cookie Policy for further details.



• **Third parties or publicly available sources.** We may receive personal data about you from various third parties as set out below:

- analytics providers such as Google based inside and outside the EU.
- search information providers such as Google based inside and outside the EU.
- Identity and Contact Data from publicly available sources such as Companies House and the Electoral Register based inside the EU.

### **How we use your personal data**

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Where we need to perform the contract we are about to enter into or have entered into with you.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal or regulatory obligation.
- Where we need to fulfil a request from you such as registering for an event or providing a requested download from our Website.

We provide the opportunity for you to explicitly “opt-in” to receive marketing communications. You have the right to withdraw consent to marketing at any time by contacting us at [marketing@sa.catapult.org.uk](mailto:marketing@sa.catapult.org.uk). Where you opt out of receiving marketing messages, this will not apply to personal data provided to us as a result of a product/service purchase, warranty registration, product/service experience or other transactions.

### **Purposes for which we will use your personal data**

- To provide services to you or the organisation you work for;
- For disclosure to third party advisors working for us or you on the same matter;
- To send you regular updates on issues we think will be of interest to you or matters which we are working on for or with you or your organisation;
- For the purpose of employment, contracting or other engagement;
- In connection with any tender or other service commissioning by us;
- To provide you with access to information and materials;
- To administer this Website and monitor and audit usage;
- To help us improve our Website, services and communications to you;
- To issue invoices and reminder notices, to raise queries in relation to invoicing and other matters, and to manage accounts, records and collection of payments and debts;
- To share information with other third parties who are working with us on services for you;
- For fraud prevention and anti-bribery purposes and for the prevention or detection of crime;



- To ensure the safety and security of our people and premises which may include disclosure to relevant third parties;
- To process your requests of, and applications to, us;
- To verify eligibility for project funding;
- For disclosures to our funders and auditors and otherwise demonstrating the impact of our organisation's receipt of public funding;
- For disclosures to or our own legal and other professional advisors and insurers;
- Providing you with further information about our products and services;
- Where we or any of our group are the subject of a merger and/or acquisition;
- As otherwise required by law or where we are permitted by law to do so;
- Where you have given written consent to such use or disclosure; and
- For any other purpose for which this information was provided to us or for any purpose related or ancillary to any of the above.

### **Change of purpose**

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

### **Disclosures of your personal data**

We may share your personal data within the Catapult group of companies, and may share your personal data with third parties where we reasonably consider that it is in our legitimate interests to do so and your interests, rights and freedoms do not override our legitimate interests. We will not sell, resell, lease or license your personal data to any third parties. We may share, transfer or disclose your personal data to comply with a legal requirement, for the administration of justice, interacting with anti-fraud databases, to protect your vital interests, to protect the security or integrity of our databases or our Website, to take precautions against legal liability, or in the event of a joint venture, collaboration, financing, sale, merger, reorganisation, change of legal form, dissolution or similar event.

We may share, transfer or disclose your personal data to a potential or actual successor to us. In each case we require the relevant third party to take adequate precautions to protect your personal data and to comply with applicable law though we cannot control the use of your personal data by third parties.

Please be aware that we may transfer your personal data to countries outside the European Economic Area (EEA) where the level of protection may not be as comprehensive as it is within the EEA. If this is the case, we will take steps to ensure that the transfer is protected by safeguards provided under



EU and UK law, such as model contract clauses or the EU-US Privacy Shield. For more information regarding these safeguards, please notify us using the contact information provided below.

### Data Security

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality. Please note that data transmitted to us is done at your own risk until received by our systems.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so. We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

### Your legal rights

You have rights under the Data Protection Act 1998 and the General Data Protection Regulations (GDPR) in relation to your personal data as listed below:

- **Request access** to your personal data (commonly known as a “data subject access request”). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
- **Request correction** of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.
- **Request erasure** of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.
- **Object to processing** of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your situation which makes you want to object to processing on these grounds as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which may override your rights and freedoms.
- **Request restriction of processing** of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data’s accuracy; (b) where our use of the data is unlawful but you do not want us to erase it;



(c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

- **Request the transfer** of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.
- **Withdraw consent at any time** where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

If you wish to exercise any of the rights set out above, please contact the data privacy manager as set out below. If you wish to unsubscribe from an email list, please email [marketing@sa.catapult.org.uk](mailto:marketing@sa.catapult.org.uk) with the subject 'unsubscribe'.

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive.

Alternatively, we may refuse to comply with your request in these circumstances. We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

### Third-party links

Our Website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our Website, we encourage you to read the privacy policy of every Website you visit.

### Cookies

You can set your browser to refuse all or some browser cookies, or to alert you when sites set or access cookies. If you disable or refuse cookies, please note that some parts of these sites may become inaccessible or not function properly. For more information about the cookies we use, please see our separate Cookie Policy.



### Contact details

Our full contact details are:

- Full name of legal entity: Satellite Applications Catapult Limited
- Title of data privacy manager: Head of Legal
- Postal address: Satellite Applications Catapult Limited, Electron Building, Fermi Avenue, Harwell, UK OX11 0QR

We would appreciate the chance to deal with your concerns so please contact us in the first instance, however you have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues.

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