

Enterprise Nation Grant Programme Privacy Policy

Effective as of May 17, 2020

Enterprise Nation, Ltd., (“**Enterprise Nation**” **we**,” “**us**” or “**our**”) manages certain grant programmes (the “**Grant Programmes**”) sponsored by third-party (the “**Grant Sponsor**”) to support eligible small businesses who need assistance due to the economic effects of the new coronavirus disease (COVID-19). This “**Privacy Policy**” describes the privacy practices of Enterprise Nation in connection with the Grant Programme, including any information or documentation provided in connection with the Grant Programme, which may be collected by Enterprise Nation, (collectively, the “**Service**”). This Privacy Policy describes the rights and choices available to individuals with respect to their information.

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Personal Information We Collect

- **Information you provide to us.** Personal information you provide to us through the Service or otherwise includes:
- **Contact data**, such as your first and last name, email and mailing addresses, phone number.
- **Registration data**, such as your username and password that you may set to establish an online account with us, and any content, text and images, along with the metadata associated with the files you upload.
- **Communications**, such as information you provide when you contact us with questions, feedback, or otherwise correspond with us.
- **Applicant data**, such as your characteristics (e.g., race, gender (including gender pronoun), and sexual orientation) and any additional applicant provided information (e.g., business plans, pitch decks, use of proceeds plans, or relevant social media account information, if applicable).
- **Financial data**, such as your stated income, economic standing, information about your financial assets and liabilities, employment history and other information necessary to perform a background check or determine your eligibility.
- **Identity data**, such as a national identification number (e.g., tax identification number, and employer identification number).
- **Other information about you** that you may provide which is not specifically listed here, but which we will use in accordance with this Privacy Policy or as otherwise disclosed at the time of collection.

How We Use Your Personal Information

We use your personal information for the following purposes and as otherwise described in this Privacy Policy or at the time of collection:

Service delivery. Enterprise Nation uses your personal information to:

- provide, operate and improve the Service;
- provide information about the Grant Programme;
- help us verify your identity and perform a background check;
- communicate with you during and after the approval process;
- review and render decisions regarding your Grant Programme application;
- service your grant award over time in connection with the Grant Programme;
- establish and maintain your account on the Service;
- communicate with you about the Service, including by sending you announcements, updates, security alerts, and support and administrative messages; and
- to respond to your requests, questions and feedback.

Research and development. Enterprise Nation collects information regarding your use of the Service for internal use to analyse and improve the Service, including by studying user demographics and use of the Service.

To comply with law. Enterprise Nation uses your personal information as we believe necessary or appropriate to comply with applicable laws, lawful requests, and legal process, such as to:

- (a) respond to subpoenas or requests from government authorities;
- (b) protect our, your or others' rights, privacy, safety or property (including by making and defending legal claims);
- (c) enforce the terms and conditions that govern the Service; and
- (e) protect, investigate and deter against fraudulent, harmful, unauthorized, unethical or illegal activity.

With your consent. In some cases we may specifically ask for your consent to collect, use or share your personal information, such as when required by law.

To create anonymous, aggregated or de-identified data. We may create anonymous, aggregated or de-identified data from your personal information and other individuals whose personal information we collect. We make personal information into anonymous, aggregated or de-identified data by removing information that would reasonably identify, relate to, describe, be capable of being associated with, or be linked, directly or indirectly, to you. We may use this anonymous, aggregated or de-identified data and share it with third parties for our lawful business purposes, including to analyse and improve the Service and promote our business.

How We Share Your Personal Information

We may share your information or data with trusted third parties who help us provide certain aspects of our services, including:

- The Grant Sponsor, as set out in the Grant Terms and Conditions
- Service providers, such as Experian Business IQ, for compliance, fraud prevention and background checks, as set out in the Grant Terms and Conditions

We enter into confidentiality and data processing terms with our partners to ensure they comply with high levels of confidentiality and best practice in privacy and security standards and we regularly review these standards and practices.

We also have to share information or data in order to:

- meet any applicable law, regulation, legal process or enforceable governmental request
- enforce applicable policies, including investigation of potential violations
- detect, prevent, or otherwise address fraud, security or technical issues
- protect against harm to the rights, property or safety of our users, the public or to us and/or as required or permitted by law

If you would like further information about who we share your personal information with, please contact us.

Publication of Successful Applicants

In accordance with the [Grants Programme Terms and Conditions](#), after the completion of the Programme and the entering into of all Grant Agreements, Enterprise Nation will publish the names of all Successful Applicants who receive Grants, and we and/or the Grant Sponsor may issue press releases or other publicity detailing any or all of the Grants.

If you object to your details being published or made available, please contact us at grants@enterprisenation.com.

We may also contact you to seek permission to share the story of how, if successful, you have used the Grant to benefit your business and your community. You are not obliged to share your story for publication.

Your Choices

In this section, we describe the rights and choices available to all users.

Access or update your personal information. If you have registered for an account with us, you may review and update certain personal information in your account profile by logging into the account.

Cookies. Our website uses cookies. Cookies are pieces of code that allow small amounts of information to be passed from your internet browser to our web server. We use third party cookies, serving several purposes. All data passed by cookies is anonymous and will never contain your name, address, telephone number or payment details.

They enable us to:

- Estimate our audience size and usage pattern
- Store information about your preferences, and so allow us to customise our site according to your individual interests
- Speed up your searches
- Recognise you when you return to our site

If you do not want to accept cookies, you can change your browser settings so that cookies are not accepted. If you do this, please be aware that you may lose some of the functionality of this website, however, this will not effect your ability to apply for the grant programme. For further information about cookies and how to disable them please go to: www.aboutcookies.org or www.allaboutcookies.org.

Do Not Track. Some Internet browsers may be configured to send “Do Not Track” signals to the online services that you visit. We currently do not respond to “Do Not Track” or similar signals. To find out more about “Do Not Track,” please visit <http://www.allaboutdnt.com>.

Choosing not to share your personal information. Where we are required by law to collect your personal information, or where we need your personal information in order to provide the Service to you, if you do not provide this information when requested (or you later ask to delete it), we may not be able to provide you with our Services. We will tell you what information you must provide to receive the Service by designating it as required at the time of collection or through other appropriate means.

Other Sites, Applications and Services

The Service may contain links to other websites, applications, and other online services operated by third parties. In addition, our content may be included on web pages or in applications or online services that are not associated with us. We do not control third party websites, applications or online services, and we are not responsible for their actions. Other websites, applications and services follow different rules regarding the collection, use and sharing of your personal information. We encourage you to read the privacy policies of the other websites, applications and online services you use.

Security Practices

The security of your personal information is important to us. We implement and maintain a number of organizational, technical and physical safeguards designed to protect the personal information we collect. However, security risk is inherent in all internet and information technologies and we cannot guarantee the security of your personal information.

Children

Children under 18 are not permitted to use the Service, and we do not knowingly collect personal information of a child under 18. If we learn that we have collected personal information of a child under 18, we will delete it. If you have reason to believe that a child under the age of 18 has provided us with information about them, please contact us as described below.

Changes to this Privacy Policy

We reserve the right to modify this Privacy Policy at any time. If we make material changes to this Privacy Policy, we will notify you by updating the date of this Privacy Policy and posting it on the Service. We may, and if required by law will, also provide notification of changes in another way that we believe is reasonably likely to reach you, such as via e-mail (if you have an account where we have your contact information) or another manner through the Service.

Any modifications to this Privacy Policy will be effective upon our posting the new terms and/or upon implementation of the new changes on the Service (or as otherwise indicated at the time of posting). In all cases, your continued use of the Service after the posting of any modified Privacy Policy indicates your acceptance of the terms of the modified Privacy Policy.

How to Contact Us

Please direct any questions or comments about this Policy or privacy practices to the Data Protection Officer, Polly Dhaliwal
polly@enterprisenation.com.