

Data Protection and Privacy Notice

All references to Juniper within this document refer equally to Juniper Ventures Limited and Juniper Pursuits Limited

Introduction

To process personal data legitimately under data protection legislation Juniper must be transparent about when and how we use the personal data. This requires us to confirm the rights of any individual (the data subject) for whom we collect or process personal data. Providing this information is the purpose of this Privacy Notice.

Juniper's registered office is:

The Old Town Hall, 29 Broadway, Stratford, London E15 4BQ

Juniper Ventures Limited (and its subsidiary Juniper Pursuits Limited) are registered in the UK at the E15 4BQ address below:

Company	Juniper Ventures Limited	Juniper Pursuits Limited
Date of Registration	27 th February 2017	27 th February 2018
Registration Number	10641710	11227559

Data Protection enquiries should be sent to:

Philippa Terry

Chief Operating Officer

Juniper Ventures Limited, The Old Town Hall, 29 Broadway, London E15 4BQ

or via email to philippa.terry@juniperventures.co.uk

Principles

This policy, like all Juniper policies, is designed to be transparent, accessible and grounded in Juniper's values:

- ⌚ **We care:** We treat every colleague with respect, empathy, and fairness.
- ⌚ **We listen and learn:** We seek to understand concerns and use them to improve.
- ⌚ **We create together:** We collaborate across teams to support business growth.
- ⌚ **We are courageous:** We address mistakes openly and take responsible action.
- ⌚ **We are proud of all we do:** We take ownership for quality and improvement.

How do we collect personal data?

We request the personal data from the data subject although we may in some circumstances collect data from third parties, such as schools in respect of data necessary for the well-being of a child or for verification purposes. On limited occasions we seek consent from the data subject to process personal data and in such circumstances the data subject has the right to withdraw permission for the processing of such data.

Why do we collect personal data?

Juniper will only collect personal data that it requires to fulfil its business functions and provide its services, to meet its contractual obligations or for the recruitment and ongoing management of

employees. The lawful basis by which Juniper collects personal data is to meet any legal and/or contractual requirements. Juniper therefore processes personal data for one or more of the following reasons:

- to meet our contractual obligations
- to verify an individual's identity
- to meet statutory or regulatory obligations including to share data with government agencies, statutory bodies, police and health if required
- to ensure the data we hold remains accurate and up to date
- to safeguard the interests of children
- to deliver and manage services and support to our customers
- to investigate and respond to queries, concerns or complaints
- to provide information, products or services that may be requested
- to ensure that marketing material and our website are presented in the most effective manner
- to provide information regarding our services
- to consider an individual for a job vacancy
- to meet obligations as an employer and manage employees
- to manage our finances
- to help with research and planning of new services
- to detect and identify fraud committed against Juniper
- to enable a defence in contractual or legal dispute.

Sharing and retaining personal Information

Juniper takes the privacy of individuals very seriously and will never disclose or share personal data without the data subject's knowledge, unless required to do so to meet contractual obligations or as required by law. For example, we may need to share personal data with health experts to discharge our duty of care and in such circumstances a contract will be in place with the third party to ensure the privacy of data is maintained.

Juniper uses the services of OneSource which is a shared back-office support service for Havering and Newham Councils. OneSource provide a shared service solution covering a range of transactional, operational and strategic services. There is a data sharing agreement between Juniper and the London Borough of Newham to share resources. OneSource services provided to Juniper include Procurement, Occupational Health and Employee Assistance Programme, Facilities Management and ICT.

If we use personal information for research and analysis, we will always keep the data subject anonymous unless they have agreed that personal information can be used for that research.

Personal data is not transferred abroad unless it is necessary and in compliance with the requirements of data protection law. By way of example, for application support, the use of a hosted solution or cloud-based software outside the UK. If data is hosted or transferred, we ensure that Juniper is compliant with the data protection laws and that there is adequate and appropriate protection of the data.

How do we store personal data?

Whether in paper or electronic format all personal data is retained safely and with appropriate security measures in place.

How long do we keep personal data?

Juniper has a retention policy in place to ensure data is not retained longer than required.

The rights of the data subject under data protection law

The right of access - the right to ask us for copies of personal information and to ask:

- what personal data we hold
- the purposes of the processing
- the categories of personal data concerned
- the recipients to whom the personal data has/will be disclosed
- for how long Juniper intend to store the personal data
- if Juniper did not collect the data directly, information about the source

The right to rectification - the right to ask us to rectify information the data subject thinks is inaccurate or incomplete.

The right to be forgotten - the right to ask us to erase personal information:

- where personal information is no longer needed for the reason, it was collected
- where the data subject has removed consent for Juniper to use the information provided and there is no other legal reason for Juniper to use it
- where there is no legal reason for the use of the information, and where deleting the information is a legal requirement

The right to restriction of processing - the right to ask us to restrict the processing of your information in certain circumstances.

The right to object to processing - the right to object to the processing of personal data in certain circumstances.

Your right to data portability - the right to ask that we transfer the information to another organisation, or to the data subject, in certain circumstances.

The data subject is not required to pay any charge when exercising these rights. If a request is made, Juniper will respond within one month.

Our communications with a data subject

We try to ensure that our communications are as effective as possible so that we make the best use of the money we spend on them. This means communicating with people in different ways, appropriate to them. On occasion, we will use information we hold, to tailor our communications about future activities. We will also use information about how individuals use our website or interact with our emails so we can make them more effective.

Use of 'cookies'

Juniper's website uses cookies. 'Cookies' are small pieces of information sent by an organisation to an individual's computer and stored on the hard drive to allow that website to recognise the individual when they visit. Cookies collect statistical data about browsing actions and patterns and do not identify an individual. For example, Juniper use cookies to analyse and track how people interact with our website and portal. This helps us to improve our website and deliver a better more personalised service.

Links to other websites

Our website may contain links to other websites run by other organisations. This privacy policy applies only to our website, so we encourage users to read the privacy statements on the other websites they

visit. Juniper cannot be responsible for the privacy policies and practices of other sites even if an individual accesses those using links from our website.

In addition, if an individual linked to Juniper's website from a third-party site, Juniper cannot be responsible for the privacy policies and practices of the owners and operators of that third party site and recommend that a user check the policy of that third party site.

Lodging A Complaint

Juniper only processes personal information in compliance with this privacy notice and in accordance with the relevant data protection laws. If however, a data subject wishes to raise a complaint regarding the processing of their personal data or are unsatisfied with how Juniper have handled their information, they should email Philippa Terry Chief Operating Officer at philippa.terry@junperventures.co.uk giving full details of your complaint.

Alternatively, you may write to:

Philippa Terry

Chief Operating Officer

Juniper Ventures Ltd, The Old Town Hall, 29 Broadway, London, E15 4 BQ

Policy or Procedure Title	Data Protection (inc. Privacy Notice)
Date Adopted by Board of Directors	30 th January 2021
Date last reviewed by Chief Executive Officer	8 th January 2026
Document Identifier	DPPN – v6 - 20260108
Reviewed by	Michael Hales
Owned by	Philippa Terry
Summary of changes from previous version	v2 - No content changes, reformatted style and document identifier added v3 – Reviewed and changes to contact points v4 – Added legal requirement for website document identifier added v5 – Reviewed and changes to contact points v6 - added reference to Juniper's Value Framework
Signed Off by Chief Executive Officer/Date	 08-01-2026