

## Data Protection and Privacy Notice

All references to Juniper within this document refer equally to Juniper Ventures Limited and Juniper Pursuits Limited (“**Juniper**”, “**we**”, “**us**”, or “**our**”).

### 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 processes personal data in accordance with the UK General Data Protection Regulation, the Data Protection Act 2018 and, where applicable, the Privacy and Electronic Communications Regulations (PECR). This Privacy Notice explains the lawful bases we rely on, the purposes for which we use personal data, and the rights of individuals under applicable law.

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 <sup>th</sup> February 2017	27 <sup>th</sup> 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](mailto:philippa.terry@juniperventures.co.uk)

Juniper Ventures Limited and Juniper Pursuits Limited act as data controllers for personal data collected through this website. This includes any information you provide through our contact forms and any data collected through essential and non-essential cookies in accordance with our [Cookie Policy](#).

### 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 to read this notice

This Privacy Notice applies only to personal data collected through our website. If you interact with Juniper in any other capacity, such as through our catering, cleaning or other operational services, or as an employee or job applicant, you may receive a separate privacy notice that applies to that specific context.

## How do we collect personal data?

We may request personal data directly from you when you use our website or submit an enquiry. Where we obtain personal data from third-party sources, we will provide or make available any privacy information required by law, and we will process such data in accordance with this Privacy Notice.

On limited occasions we may seek consent from the data subject to process personal data and in such circumstances the data subject has the right to withdraw consent at any time, which will not affect the lawfulness of processing based on consent before its withdrawal.

## Why do we collect personal data?

Juniper collects personal data through this website only where it is necessary for the functions of the site, to respond to enquiries submitted by users, or where users choose to enable optional cookies. Juniper relies on a number of lawful bases under the UK GDPR for this processing, including legitimate interests, consent and compliance with legal obligations, depending on the specific context. These purposes and lawful bases are set out in the table below:

Purpose of Processing	Lawful Basis	Data Types Involved
Operating and securing the website	Legitimate interests	IP address, device information, browser type, security logs, diagnostic data
Managing cookie preferences and essential cookies	Legitimate interests; necessary for the service	Consent status, essential cookie identifiers
Setting non-essential cookies where consent is given	Consent	Online identifiers, usage data, analytics metrics
Responding to website enquiries	Legitimate interests	Name, email address, phone number, message content
Ensuring correct website display and functionality	Legitimate interests	Device information, interaction data, session data

Where we rely on legitimate interests, we balance our interests against the individual's rights and freedoms.

## Automated decision-making




Juniper does not make decisions about individuals based solely on automated processing that produce legal effects or similarly significant effects. If this changes, we will provide the required information and safeguards.

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.

Where Juniper uses third-party service providers to process personal data on our behalf, we maintain written data-processing agreements with those providers in accordance with Article 28 UK GDPR.

## Who we share personal data with

We may share personal data with:

-  Service providers acting as our processors, including IT hosting and support
-  Professional advisers and insurers
-  Regulators, law enforcement or public bodies where required by law

## We enter into written Data Processing Agreements with our processors.

Where personal data is transferred or hosted outside the UK (which may occur for certain IT and cloud-hosting services), we rely on one of the following safeguards: UK adequacy regulations, the UK International Data Transfer Agreement or the UK Addendum to the EU Standard Contractual Clauses. Where required, we also complete a transfer risk assessment.

## 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. These measures include user access controls, secure system configuration, staff training, encryption where appropriate, and regular testing and monitoring of our technical organisational safeguards.

## How long do we keep personal data?

We retain personal data collected through this website only for as long as necessary for the purposes set out in this Privacy Notice. Retention periods vary depending on the type of data and the reason it was collected, but we do not keep website-related personal data for longer than is needed to respond to enquiries, manage preferences or meet our legal obligations.

## 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 lodge a complaint with the Information Commissioner's Office (ICO)
-  the right to withdraw consent. Where we rely on consent, you have the right to withdraw it at any time. This does not affect the lawfulness of processing carried out before withdrawal.

**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. Juniper may request reasonable identification to verify the requester's identity before responding.

## Our communications with a data subject

We aim to ensure that our website communications are clear and effective. We may use information about how you use our website, including how you interact with pages and content, to help us improve the way the site functions. If we send any direct marketing by email, this will be done in accordance with the UK GDPR and PECR, and you can opt out at any time.

## 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. For cookies that are not strictly necessary, we will obtain user consent and provide a means for users to manage their cookie preferences in line with the Privacy and electronic Communications Regulations.

## Cookie choices and details

Non-essential cookies and similar technologies are set only with your consent. You can change your preferences at any time via our consent settings. A list of the cookies and similar technologies we use, including name, provider, purpose and duration, is available in our cookie table and is reviewed periodically.

## Links to other websites

Our website may contain links to other websites run by other organisations. This privacy policy applies

only to our website, and Juniper does not control how those third parties process personal data. We accordingly 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 as those parties will be separate data controllers for any personal data collected through their own websites.

## 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@juniperventures.co.uk](mailto:philippa.terry@juniperventures.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

If you remain dissatisfied after raising your concerns, you may lodge a complaint with the Information Commissioner's Office via [www.ico.org.uk](http://www.ico.org.uk) or by calling 0303 123 1113