**THE INDEPENDENT PLATFORM - PRIVACY POLICY**

The Independent Platform ("**The Independent Platform**", "**we**", "**our**", or "**us**") is committed to protecting and respecting your privacy.

1. **OUR APPROACH TO PRIVACY**

This privacy policy sets out how we collect, store, process, transfer, share and use data that identifies or is associated with you ("**personal information**") when you use any website operated by us (including <https://independent-platform.co.uk/>), any services we provide or otherwise interact with us (together the “**Services**”).

1. **ABOUT US**

The IndependenT Platform Ltd is the data controller of the personal information we hold about you.

We can be contacted by following the Contact Us page on our website.

1. **PERSONAL INFORMATION WE COLLECT ABOUT YOU AND HOW WE USE IT**

The table at **Annex 1** sets out the categories of personal information we collect about you and how we use that information. The table also lists the legal basis which we rely on to process the personal information.

More generally, you may provide us with personal information when you:

1. sign up to learn more;
2. sign up as an independent candidate;
3. are using our website;
4. communicate with us (whether online including via social media, our contact form, or by email); and
5. when you answer our surveys or participate in our events, campaigns and partnerships.

Special categories of personal data

Some of the personal information you provide us, including your political views and certain other information you may choose to provide as part of using the Services (such as information about your race, philosophical beliefs and religion) will be treated as special category personal data to which additional protections apply under data protection law.

We process such special category personal data because you have chosen to submit that information to our Services. We will not share this data with anyone other than in accordance with this privacy policy. When providing information to us via the Services, you can provide as much or as little detail as you see fit.

1. **DATA RETENTION**

We will only retain your personal information for as long as reasonably necessary to fulfil the purposes for which we collected it. To determine the appropriate retention period for personal information, we consider the amount, nature and sensitivity of the personal information, the potential risk of harm from unauthorised use or disclosure of your personal information, the purposes for which we process your personal information and whether we can achieve those purposes through other means, as well as the applicable legal, regulatory, tax, accounting, or other requirements.

1. **RECIPIENTS OF PERSONAL INFORMATION**

We may share your personal information with the following (as required in accordance with the uses set out in **Annex 1** or as otherwise described below):

1. **Service providers**: we may share your personal information with third parties and other service providers that perform services for us or on our behalf, which may include providing data hosting, data centre and storage facilities, communications, surveys and chat facilities, social media platforms, marketing communications, advertising, technical support, error reporting and fixing, analytics, and/or fraud prevention.
2. **Law enforcement, regulators and other parties for legal reasons**: we may share your personal information with third parties as required by law or if we reasonably believe that such action is necessary to (i) comply with the law and/or the reasonable requests of law enforcement; (ii) detect and investigate illegal activities and breaches of agreements; (iii) enforce our terms and/or (iv) exercise or protect the rights, property, or personal safety of The IndependenT Platform, its users or others. This includes exchanging information with other companies and organizations for the purposes of cybersecurity, fraud protection, and credit risk reduction.
3. **Other members of the The IndependenT Platform organisation**: where applicable, we may share your personal information with our affiliates (for example, where they provide services on our behalf) or where such sharing is otherwise necessary in accordance with the uses set out in **Annex 1**.
4. **MARKETING AND ADVERTISING**

From time to time, we may contact you with information about the Services, including sending you marketing messages and asking for your feedback on our Services. Most marketing messages we send will be by email. For some marketing messages, we may use personal information we collect about you to help us determine the most relevant marketing information to share with you.

We will only send you marketing messages if we have your consent or, if consent is not required under applicable law, you have not opted out of receiving messages from us. You can withdraw your consent or opt out of receiving further communications at a later date, by clicking on the unsubscribe link at the bottom of our marketing emails.

Unsubscribing from marketing emails will not unsubscribe you from system or legal notifications which we may need to send as part of the Services we provide. From time to time, we may need to contact you by email or via our support team.

1. **STORING AND TRANSFERRING YOUR PERSONAL INFORMATION**

**Security**. We implement appropriate technical and organisational measures, including encryption, to protect your personal information against accidental or unlawful access, destruction, loss, alteration, or damage. All personal information we collect will be stored on our secure servers. Where data processing is carried out on our behalf by a third party, we take steps to ensure that appropriate security measures are in place to prevent unauthorised disclosure of personal information.

Despite these precautions, however, we cannot guarantee the security of information transmitted over the internet or that unauthorised persons will not obtain access to personal information.

**International Transfers of your Personal Information**. The personal information we collect may be transferred to and stored in countries outside of the jurisdiction you are in where our affiliates and our third party service providers have operations. If you are located in the UK or European Economic Area ("**EEA**"), your personal information may be transferred outside of the UK and EEA respectively to a country which is not recognised by the UK or European Commission as ensuring an adequate level of protection for personal data. These international transfers of your personal information will be made pursuant to appropriate safeguards, such as standard contractual clauses adopted by the European Commission and UK government (as applicable). If you wish to enquire further about the safeguards used, please contact us using the details set out at the end of this privacy policy.

1. **YOUR RIGHTS IN RESPECT OF YOUR PERSONAL INFORMATION**

In accordance with applicable privacy law, you have the following rights in respect of your personal information that we hold:

1. **Right of access**. You have the right to obtain access to your personal information.
2. **Right of portability**. You have the right, in certain circumstances, to receive a copy of the personal information you have provided to us in a structured, commonly used, machine-readable format that supports re-use, or to request the transfer of your personal information to another person.
3. **Right to rectification**. You have the right to obtain rectification of any inaccurate or incomplete personal information we hold about you without undue delay.
4. **Right to erasure**. You have the right, in some circumstances, to require us to erase your personal information without undue delay if the continued processing of that personal information is not justified.
5. **Right to restriction**. You have the right, in some circumstances, to require us to limit the purposes for which we process your personal information if the continued processing of the personal information in this way is not justified, such as where the accuracy of the personal information is contested by you.
6. **Right to withdraw consent**. If you have provided consent to any processing of your personal information, you have a right to withdraw that consent (without affecting the lawfulness of our processing prior to you having withdrawn your consent).

**Right to object: you also have the right, in certain circumstances, to object to any processing based on our legitimate interests in certain circumstances. You can also object to our direct marketing activities for any reason by clicking the “unsubscribe” link set out in any marketing communication you receive. See paragraph 6 for further details.**

Please note that the above rights are not absolute, and we may be entitled to refuse requests, wholly or partly, where exceptions under the applicable law apply. If you wish to exercise one of these rights, please contact us using the contact details at the end of this privacy policy. You also have the right to lodge a complaint to your national data protection authority. If you are in the UK, information on how to contact the Information Commissioner is available at [www.ico.org.uk](http://www.ico.org.uk). If you are located in the EU, further information about how to contact your local data protection authority is available at:

<http://ec.europa.eu/justice/data-protection/bodies/authorities/index_en.htm>.

1. **COOKIES AND SIMILAR TECHNOLOGIES**

Our website uses cookies and similar technologies to distinguish you from other users of our Services. Please refer to our Cookies Policy for more information as to the way in which we use cookies on our website.

1. **LINKS TO THIRD PARTY SITES**

Our website(s) may, from time to time, contain links to and from third party websites, including those of our business partners, advertisers, news publications and affiliates. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for their policies. Please check the individual policies before you submit any information to those websites.

1. **CHANGES TO THIS POLICY**

We may update this privacy policy from time to time and so you should review this page periodically. When we change this privacy policy in a material way, we will update the "last modified" date at the end of this privacy policy. Changes to this privacy policy are effective when they are posted on this page.

1. **CONTACTING US**

If you have any questions, comments and requests regarding this Privacy Policy, you can contact u on this page.

This privacy policy was last modified on 23 May 2024.

# **ANNEX 1 – PERSONAL INFORMATION WE COLLECT**

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| **Category of personal information** | **How we use it** | **Legal basis for processing** |
| **Contact details**(username, email address and phone number) | To register your interest with The IndependenT Platform, either as a potential candidate or interested voter. | Such processing is all necessary to perform our contract with you. |
| **Contact details****Marketing details** (such as your marketing preferences)**Technical information and Usage data** (see definitions below) | Marketing and advertising (including sending you newsletters and measuring the effectiveness of our marketing). | Consent (if required by law)Where consent is not required by law, it is in our legitimate interests to study how users use our Services and to grow and market our campaign. |
| **Technical information** (IP address, browser type, internet service provider, device identifier, time zone setting, browser plug-in types and versions, preferred language, activities, and operating system).**Usage data** (including clickstream to, through and from the Services, pages you viewed and searched for, and page response times) | Analytics (such as analysing usage of the Services).Improve the Services to ensure that content is presented in the most effective manner for you.Marketing and advertising.To ascertain your preferences. | Consent (if required by law).Where consent is not required by law, it is in our legitimate interests to study how individuals use our Services and to grow and market our campaign. |
| **Contact details****Technical and Usage data** | To administer and protect our Services (including troubleshooting, fraud prevention, IT security, data analysis, testing, system maintenance, support, reporting and hosting of data) | It is in our legitimate interests to monitor the Services and resolve errors to ensure that everything functions properly.To comply with our legal and regulatory obligations under applicable law.It is also in our legitimate interests to protect systems and data and to prevent and detect criminal activity that could be damaging for you and/or us. |