

Governance Policy

Governance Framework

Danu Insight (Danu Data Insight C.I.C. Registration no. 12659912) is committed to upholding the highest standards of integrity, transparency, and accountability across all facets of our operations. As part of our governance framework, we have implemented policies that ensure our business complies with legal, regulatory, and ethical standards. This approach is essential to safeguarding the interests of our clients, employees, and stakeholders while fostering a culture of responsibility, innovation, and continuous improvement.

At the core of our governance principles are the following values:

- **Integrity:** We act with honesty and fairness in all business dealings.
- **Transparency:** We are open and clear in our communication and decision-making processes.
- **Accountability:** Every member of our team is responsible for upholding these governance standards.
- **Sustainability:** We are committed to making long-term decisions that positively impact our society and environment.

This governance framework enables us to not only meet our compliance obligations but also advance our vision of using data-driven insights to contribute meaningfully to societal and environmental progress.

Below, we outline the key governance areas that guide our operations:

1. Non-profit Community Interest Company (C.I.C)
2. Privacy and Data Protection Policies (GDPR Compliance)
3. Health and Safety Compliance
4. Financial and Regulatory Reporting
5. Anti-Bribery and Anti-Corruption Policy

1. Non-profit Community Interest Company (C.I.C)

1. Definition and Purpose

- **Community Interest Company (CIC):** Danu Data Insight operates as a non-profit regulated in the UK by the Office of the Regulator of Community Interest Companies, which ensures a focus on benefiting the community rather than private gain. Surpluses are reinvested into the community.
- **Primary Objective:** Activities centre on promoting transparency and accountability in corporate lobbying related to climate change and biodiversity. The aim is to provide critical information to the public, NGOs, and stakeholders to foster alignment between corporate policies and environmental goals.

2. Asset Lock

- Assets cannot be transferred except under strict conditions, ensuring they remain dedicated to community benefit.
- If the company is wound up, remaining assets are transferred to a specified asset-locked body, **CDP (CDP Worldwide)**.

3. Not-for-Profit Principle

- The company is not established for private gain, and any surpluses are used for the benefit of the community.

4. Powers and Governance

- **Powers:** The company can engage in lawful activities to further its objectives, including raising funds and investments.
- **Director Responsibilities:** Directors manage the business and are empowered to delegate, make decisions collectively, and resolve conflicts of interest.
- **Conflict Management:** Strict rules govern handling conflicts of interest to ensure transparency and integrity.

2. Privacy and Data Protection Policies (GDPR Compliance)

BACKGROUND

Danu Insight understands that your privacy is important and that you care about how your personal data is used. We respect and value the privacy of everyone who visits our website, danuinsight.org (“Our Site”), and we will only collect and use personal data in ways that are described here, in compliance with GDPR, and consistent with your rights under the law.

Please read this Privacy Policy carefully to ensure that you understand it. By using Our Site, you accept this Privacy Policy. If you do not agree with it, please stop using Our Site immediately.

Google Analytics

Our Site uses Google Analytics to analyze how users interact with it, helping us enhance the user experience. Data collected includes anonymized IP addresses, browser types, referring pages, and visit durations. You can learn more about Google Analytics’ data practices in their Privacy Policy. You can also manage your cookie preferences, including opting out of Google Analytics, through the link in the footer.

Pop-up Survey

We may occasionally conduct voluntary surveys to gather feedback on your experience. These surveys are entirely anonymous and do not collect personal information like names or email addresses. The data collected is used solely to improve our services, and participation is optional.

Managing Cookie Preferences

You can manage your cookie preferences anytime by accessing our cookie settings. This includes opting in or out of analytics cookies, which help improve your experience on our site.

1. Definitions and Interpretation

In this Policy, the following terms shall have the meanings specified:

- **Account:** An account required to access certain areas or features of Our Site.
- **Cookie:** A small text file placed on your computer or device by Our Site when you visit certain parts of it or use certain features.
- **Cookie Law:** Refers to the relevant parts of the Privacy and Electronic Communications (EC Directive) Regulations 2003.
- **Personal data:** Any data that identifies an individual, as defined by EU Regulation 2016/679 General Data Protection Regulation (GDPR).
- **We/Us/Our:** Refers to Danu Data Insight Ltd. (Company Registration no. 12659912).

3. What Does This Policy Cover?

This Privacy Notice applies to your use of Danu Insight's website. Our Site may contain links to third-party websites, but we have no control over how they collect or use your data. We encourage you to check their privacy policies before providing any personal data to them.

4. What Is Personal Data?

Personal data is any information that enables an individual to be identified. This includes obvious data such as names and contact information, but also less obvious data such as IP addresses and other online identifiers. Special categories of data, such as information on race, religion, or health, are considered sensitive under GDPR, but we do not typically collect such data.

5. What Data Do We Collect?

Depending on how you use Our Site, we may collect:

- **When you sign up:** Name, surname, firm type, firm name, role, country, email, password.
- **Automatically when you visit Our Site:** IP address, browser type and version, operating system, and site activity (URLs, time spent, referring site).

This data is used for system administration, to analyze trends, and to customize content.

6. How Do We Use Your Personal Data?

We may use your personal data for the following:

- Managing your account and access to Our Site.
- Personalizing your experience.

- Communicating with you, such as responding to emails.
- Providing tailored information or newsletters (with the option to unsubscribe).
- Analyzing your use of Our Site to improve the user experience.

With your permission, we may also use your data to send you our newsletter. You can opt-out at any time by emailing us or following the instructions in any email you receive.

7. Our Lawful Bases

We process your personal data based on the following lawful bases:

- Performance of a contract (e.g., providing you with our services).
- Legitimate interests (e.g., improving our services).
- Your consent (e.g., for newsletters), which can be withdrawn at any time.
- Legal obligations (e.g., reporting to regulatory bodies).

8. How Long Will We Keep Your Personal Data?

We will retain your personal data only as long as necessary for the purpose it was collected. Our retention periods depend on legal requirements, contractual obligations, and business needs. Once the relevant period expires, your data will be securely deleted. If you have any questions, contact us at dataprotection@danuinsight.org.

9. Where Do You Store or Transfer My Personal Data?

Your personal data may be stored or transferred within the UK, Europe, or the US, where applicable safeguards are in place to ensure data protection compliance.

10. How We Share Your Personal Data

We may share your data with third parties such as:

- Service providers (e.g., web hosting or IT services).
- Professional advisors (e.g., accountants or auditors).
- Legal authorities, if required by law.
- As part of a merger, sale, or restructuring of our business.
- With your consent or as disclosed at the point of collection.

11. Your Rights

Under GDPR, you have the following rights:

- Access to your personal data.
- Rectification of inaccurate or incomplete data.

- Erasure of data ("the right to be forgotten").
- Restriction of data processing.
- Objection to processing in certain circumstances.
- Data portability.
- Withdrawal of consent for processing at any time.

For more information or to exercise your rights, contact us using the details provided in Part 14.

12. Withholding Information

You can access some parts of Our Site without providing personal data. However, certain features (e.g., downloads) may require data collection or cookie consent.

13. How Do You Use Cookies?

We use first-party cookies to improve your experience on Our Site, and all cookies comply with current cookie law. Cookies are used for functions like login status and analytics tracking (via Google Analytics).

You can control cookie preferences through your browser settings, though disabling them may affect certain functionalities of Our Site.

14. Contact Us

For any questions about your personal data or to exercise your rights, contact us at:
Email: info@danuinsight.org

15. Changes to This Privacy Notice

We may update this Privacy Policy from time to time. Any changes will be posted here, and we encourage you to review it periodically. We will notify you of significant changes where appropriate.

3. Health and Safety Compliance

Danu Insight Ltd. is dedicated to maintaining a safe and healthy work environment for all employees, clients, and visitors. Our Health and Safety Policy is guided by best practices and complies with the **Health and Safety at Work Act 1974** and related legislation.

Key Responsibilities

Management Accountability

Senior management is responsible for implementing and maintaining health and safety measures. Managers will ensure that regular risk assessments are conducted and all hazards are identified and mitigated.

Employee Responsibility

All employees must follow safety protocols, report hazards, and participate in health and safety training.

Risk Assessments

Regular assessments are conducted to identify hazards, evaluate risks, and implement necessary control measures to reduce risks to acceptable levels. This includes risks related to ergonomics, physical hazards, and any specific risks associated with particular job functions.

Incident Reporting and Investigation

All incidents and near misses must be reported and investigated promptly to prevent reoccurrence. A designated Health and Safety Officer will oversee the investigation and make recommendations.

Emergency Procedures

We have comprehensive emergency procedures in place, including fire safety, first aid, and evacuation plans. All employees will be trained in these procedures, and regular drills will be conducted to ensure everyone is prepared for any emergency situation.

Health and Safety Reviews

We regularly review our health and safety practices to ensure continuous improvement in our safety performance.

4. Financial and Regulatory Reporting

At Danu Insight we understand the importance of transparent and accurate financial and regulatory reporting. Our financial reporting practices comply with the International Financial Reporting Standards (IFRS) and relevant UK Financial Conduct Authority (FCA) regulations.

Financial Integrity and Accuracy**Transparency**

All financial records must be accurate and complete, reflecting a true representation of the company's financial health.

Audit and Control

We conduct regular audits to verify compliance with financial regulations, assess internal controls, and ensure that all financial statements are correct and transparent.

Segregation of Duties

To reduce the risk of fraud, financial responsibilities are distributed among different employees to ensure that no single individual controls all aspects of any financial transaction.

Compliance with Tax Obligations

Danu Insight adheres to all applicable tax laws, ensuring timely and accurate filing of corporate tax returns. We work closely with auditors and financial consultants to ensure compliance with tax regulations and reporting obligations.

Internal Monitoring and Reporting

The company maintains an internal reporting structure to monitor financial performance, cash flow, and key financial risks. This ensures that we remain agile and responsive to any regulatory changes or financial risks.

5. Anti-Bribery and Anti-Corruption Policy

Danu Insight Ltd. is committed to operating with integrity and fairness in all business dealings. We maintain a **zero-tolerance** policy towards bribery and corruption, in accordance with the **UK Bribery Act 2010**.

Prohibited Conduct:

- Bribery: Offering, giving, receiving, or soliciting something of value to influence a business decision or gain an unfair advantage is strictly prohibited.
- Facilitation Payments: We do not permit any facilitation payments to expedite routine governmental actions.
- Gifts and Hospitality: All gifts, entertainment, or hospitality must be reasonable and transparent. Any gift or benefit that could influence business decisions must be declared and approved by management.

Reporting

All employees have a duty to report any suspicions of bribery or corruption. Reports can be made through the company's confidential whistleblowing mechanism to ensure that whistleblowers are protected from retaliation.

Training and Compliance

All employees are required to undergo anti-bribery training to ensure they understand the company's policies and legal obligations. We will regularly monitor compliance and take necessary action to mitigate risks.

Any violation of the Anti-Bribery and Anti-Corruption Policy will result in disciplinary action and may lead to criminal penalties.

Please see our website for further information: <https://www.danuinsight.org/>