

Nottingham Trent University – Privacy Notice Help to Grow: Management

Introduction

Your privacy and protection of your personal information is very important to us and we are committed to robust compliance with the retained EU law version of the General Data Protection Regulation (“**UK GDPR**”) and the Data Protection Act 2018.

This privacy notice explains what Nottingham Trent University (“NTU”, “NBS”, “we”, “us” or “our”) does with your personal information, your rights and how we protect it. This notice is for all individuals (“you” or “your”) involved in the Help to Grow: Management Programme at Nottingham Trent University, Nottingham Business School (“NBS”).

The **Help to Grow: Management Programme** (“the Programme”) is part funded by the Government Department for Business, Energy and Industrial Strategy (“BEIS”) who are the Data Controller, to support senior managers of small and medium sized businesses (SMEs) to boost their business’s performance, resilience, and long-term growth. The Programme will offer an online diagnostic, facilitated group webinars, peer review sessions, face to face case study workshops and 10 hours of one to one mentoring.

To deliver the **Help to Grow: Management Programme**, Nottingham Trent University works in collaboration with **The Chartered Association of Business Schools (“CABS”)** Incorporated by Royal Charter and a registered charity in England and Wales (charity number 1162854), address 40 Queen Street, London, EC4R 1DD. CABS are the Data Processor. NTU, is a Data Sub-Processor.

Who we are

For the purposes of the UK GDPR, NTU is a sub-processor which means we provide the Programme on behalf of CABS who receiving funding from BEIS.

You can find us in the Information Commissioner’s register of organisations who have paid the controller fee [here](#).

If you have any questions about the use of your personal information within either of the Projects, or wish to exercise your rights, please contact:

Liz Morley, SME Project Manager
Telephone: 0115 84 88903
Email: grow@ntu.ac.uk

Or our Data Protection Officer at
Email: DPO@ntu.ac.uk

We may need to update this Privacy Notice from time to time. If changes made to this Privacy Notice are considered to be material, we will notify you of the changes.

Personal Information

NTU is committed to the responsible handling and protection of personal information.

*Personal data, or personal information, means any information about an individual from which that person (a “**Data Subject**”) can be identified. It does not include data where the identity has been removed (anonymous data). The information will be personal data if a person can be identified either directly or indirectly, in particular by reference to an*



identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that person. For example personal data may include names, addresses, email addresses and telephone numbers; it may also include images in photographs or films and recorded telephone conversations

Why we process your personal information

We process your personal information to enable us to deliver the Programme and to assess your eligibility for the Programme.

Further information on the ways in which we handle your personal information is provided below.

We want to be clear about our privacy practices so that you are fully informed and can make choices about the use of your information, and we encourage you to contact us at any time with questions or concerns – grow@ntu.ac.uk or the Data Protection Officer at DPO@ntu.ac.uk.

How we collect and use your personal information

We collect personal information about you in a number of ways:

- Through our website and expression of interest form. Please see our website privacy policy: <https://www.ntu.ac.uk/policies/privacy-statement>.
- If you contact us, we may keep a record of that correspondence. If you send us personal information via email, letter or phone, we may keep that information and your contact details.
- If you are a participant, we will collect information relating to your attendance at the Programme.
- We will collect information from the CABs virtual learning environment platform.

Initially, we will use your personal information to allow us to assess you or your organisation's eligibility for the Programme and carry out any necessary checks.

We will use your personal information for the administration of you and your company's involvement in the programme and to keep in touch with you and to provide you with information about the Programme and the benefits available to you (and your employer where applicable).

We will also use your information to provide statistical information through the monitoring undertaken as part of the Programme Support – this statistical information will be provided to CAB and BEIS. This will be through anonymisation.

When processing personal data, we rely on a combination of the grounds permitted by data protection law.

Your rights as a Data Subject can depend on the legal basis relied upon (please see heading below "Your Rights").

Illustrative examples of the types of processing activities which fall under each of the legal bases are as follows:



Lawful basis	Summary of what the lawful basis involves	Examples of circumstances in which we process personal data on this basis (processing activity)
Consent	You have given consent for us to process your personal data.	<ul style="list-style-type: none">• Some forms of contact and invitations of support which are undertaken electronically (other forms of these communications fall within the "legitimate interests" basis below).• Targeting advertising tailored advertising for future projects or other services that may be relevant to you.• Processing information collected for our diversity monitoring purposes.
Contract:	The processing is necessary for us to "perform" a contract we have with you, or because you have asked us to take specific steps before entering a contract.	<ul style="list-style-type: none">• To carry out our contractual obligations with you, which may include the operation and delivery of our services in respect of the Programme, and dealing with requests and enquiries.• To enable all financial transactions to and from us in respect of the Programme, including payments.
Legal obligation	The processing is necessary for us to comply with any statutory or legal obligation to which we are subject.	<ul style="list-style-type: none">• Where it is necessary to comply with a legal and/or statutory obligation.
Legitimate Interests	The processing is necessary for our legitimate interests or the legitimate interests of a third party, and there is no reason to protect your personal data which overrides those legitimate interests.	<ul style="list-style-type: none">• If we do not have a contract in place with you and you have not asked us to take steps before entering into a contract, the delivery of our services in respect of the Programme, and dealing with requests and enquiries.• To identify opportunities, products and services that may be of interest to you, and to invite you to get involved with University activities, including events, fundraising, mentoring, guest speaking and research. This may include disclosing personal data to trusted third parties, such as appointed service providers, from time to time.• To personalise better, and send communications to you.• To ensure the data we hold is up to date and accurate.• To identify future opportunities to get involved, which may be of interest to you.• To notify you about changes to our services.



Vital interests

The processing is necessary to protect someone's life (either the data subject, or another person).

- Disclosures may be made to external parties to ensure the safety and wellbeing of individuals; e.g. we may share your contact details with emergency health services if you are taken unwell while on the premises during the Programme.

Where special categories of personal data (see above) are processed, the permitted legal bases for doing so will include:

- Explicit consent of the data subject.
- Processing necessary to protect vital interests (see above).
- The processing of personal data manifestly made public.
- Purposes specified in data protection law as being in the substantial public interest.
- The processing is necessary for reasons of public interest in the area of public health.
- For archiving, statistical and research purposes.

Who we share your personal information with

Some or all of the personal information relating to participants will be shared with individual departments and functions of NTU.

As per CAB's [Privacy Notice](#), CAB will share personal information with NTU to register you on the Programme. NTU will share personal information and statistical information back with CAB and/or BEIS to manage your participation on the Programme and for monitoring purposes, in accordance with the funding. BEIS' privacy notice can be found within CAB's privacy notice but for ease a link is here:

<https://www.gov.uk/government/organisations/department-for-business-energy-and-industrial-strategy/about/personal-information-charter#beis-privacy-notice>.

In addition personal information will be shared with external project auditors and project evaluators for the purposes of checking eligibility, compliance with the Programme and applicable State Aid Regulations and for audit purposes. All such third parties are prohibited from using your personal information except to provide these services to NTU, and they are required to maintain the confidentiality of your information. NTU ensures such third parties handle your information in accordance with the UK GDPR.

Your personal information will not be shared for commercial or marketing purposes.

Where necessary we will share information required by law or in the public interest, with, for example, the police or HM Revenue and Customs, any relevant regulator or to exercise or defend our legal rights.

Where information is shared outside the UK and European Economic Area we take appropriate steps to ensure that personal information is processed, secured, and transferred according to applicable law. When we transfer personal information from the UK to other countries in which applicable laws do not offer the same level of data privacy protection as in the UK, we take measures to provide an appropriate level of data privacy protection.

This means, your rights and protection remain with your data, i.e.: we use approved contractual clauses, multiparty data transfer agreements, intragroup agreements, and other measures designed to ensure that the recipients of your personal information protect



it. If you would like to know more about our data transfer practices, please contact DPO@ntu.ac.uk.

Anonymised data is likely to form part of a research publication, conference presentation or public talk

How long we keep your personal information for

We will retain your personal information for a period of 6 years after 30 April 2024 (end of the Programme funding) in line with funding requirements.

Your duty to inform us of changes

It is important that the personal information we hold about you is accurate and current. Please keep us informed if your personal information changes.

Security of your personal information

We have in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal information to those employees and other third parties who have a legitimate need to know. They will only process your personal information on our instructions and they are subject to a duty of confidentiality.

NTU takes data security seriously and we use appropriate technologies and procedures to protect personal information. For example:

- Policies and procedures – measures are in place to protect against accidental loss and unauthorised access, use, destruction, or disclosure of data.
- Business Continuity and Disaster Recovery strategies that are designed to safeguard the continuity of our service and to protect our people and assets.
- Appropriate restrictions on access to personal information.
- Physical measures, to store and transfer data securely.
- Data Privacy Impact Assessments (DPIA) in accordance with legal requirements and our business policies.
- Periodic training on privacy, information security, and other related subjects for employees and contractors.

Your rights

You have a range of rights over your personal information. Under certain circumstances, by law you have the right to:

- **Request access** to your personal information (commonly known as a "data subject access request"). This enables you to receive a copy of the personal information we hold about you.
- **Request correction** of any inaccuracies relating to your personal information we hold about you.
- **Request erasure** or deletion of your personal information when it is no longer required.
- **Object to processing** of your personal information where we are processing your personal information on the basis of our legitimate interest (or that of a third party) and there is something about your particular situation which makes you want to object to processing on this ground. You also have the right to object where we are processing your personal information for direct marketing purposes.
- **Request the restriction or suspension** of processing of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.



- **Object to any direct marketing** (for example, email marketing or phone calls) by us, and to require us to stop such marketing.
- **Request the transfer** of your personal information to another party.

If you wish to exercise your personal data rights or have any questions about how we use your data, please get in touch using the contact details at the top of this Privacy Notice. If you believe that we have failed to manage your personal data appropriately, you have the right to complain to the statutory regulator – The Information Commissioner’s Office. The ICO contact details are: <https://ico.org.uk/global/contact-us/>

This privacy notice was last updated on [03.08.2021]