

Nottingham Trent University – Privacy Notice – Enabling Innovation

Introduction

Nottingham Trent University (NTU) and Enabling Innovation are committed to protecting the privacy and security of your personal information, this Privacy Notice provides important information about how Nottingham Trent University and its associated entities ("NTU," "we," or "us") which includes Confetti Constellations Ltd, Nottingham Conference Centre Ltd, Nottingham Consultants Ltd, Nottingham Law School Legal Advice Centre Ltd, Nova Centric Ltd and NTU Temporary Staff Ltd) ("we", "our" or "us") identifies and manages its Data Protection responsibilities in accordance with its legal and regulatory obligations.

NTU encourages you to review the privacy statements of any websites you choose to navigate to from our website (or navigate from to our website) or digital services that we provide links to so that you can understand how those websites collect, use and share your information as well. Any third party sites that you can access through the website are not covered by this Privacy Notice and we accept no responsibility or liability for these sites.

Enabling Innovation is for small and medium-sized businesses in Nottinghamshire and Derbyshire who want to benefit from university expertise in research and innovation to develop and grow their business.

Who we are

NTU is a "data controller" which means we are responsible for deciding how we hold and use personal information about you.

This Privacy Notice applies to all participants of the Enabling innovation project ("you" or "your") or services that link to it (collectively, our "Services"). Occasionally, a Service will link to a different Privacy Statement that will outline the particular privacy practices of that Service. Such as:

- Nottingham Law School [Legal Advice Centre Limited](#)
- [Website and Cookies](#)
- [Nottingham Trent University](#)
- [European Regional Development Fund](#)

Please read this Privacy Notice carefully and contact our Data Protection Officer if you have any questions about our privacy practices or your personal information choices.

Attn: Rebecca Jenkyn, Data Protection Officer
Nottingham Trent University
Address: 50 Shakespeare Street, Nottingham, NG1 4FQ
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 data

We collect, use, disclose, transfer, and store personal information to provide Services to you and for our operational and business purposes as described in this Privacy Notice. 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. DPO@ntu.ac.uk

The types of personal information we collect

We collect personal information from you, for example, when you request information, register, or use any of our Services. The categories of personal information that we may collect, store and use about you include (but are not limited to)

- Name, gender, telephone number and age
- Enterprise address, postcode, telephone and email address
- Registered company number and date of incorporation
- Business details, such as: ownership details, employee numbers and turnover
- Ethnic origin
- Disability
- Bank details and/or payment card details;
- Visual images / photographs (including CCTV);
- Computing and email information including login details, network access and library usage;

In some circumstances, we may also collect, store and use the following "special categories" of data which may include (but are not limited to) *racial or ethnic origin, political opinions, religious or similar beliefs, trade union membership, physical or mental health conditions, and Personal Data relating to criminal offences and convictions we have asked you to declare.*

We may process special category personal information in the following circumstances:

- In limited circumstances, with your explicit written consent.
- Where we need to carry out our legal obligations or comply with relevant legislation or the obligations set out under the Enabling Innovation project
- Where it is needed in the public interest, such as for equal opportunities monitoring and reporting or to carry out Criminal Record background checks.
- Where the processing is necessary for archiving purposes in the public interest, or for scientific or historical research purposes, or statistical purposes, subject to further safeguards for your fundamental rights and interests specified in law.

How we collect your data

Not all of the personal information Enabling Innovation holds about you will always come directly from you. Apart from the data that you provide to us, we may also process data about you from a range of sources, which include:

- Data that we and our staff generate about you, as part of the Enabling Innovation project.
- Data from our partners at the University of Nottingham, and the University of Derby which may include contact details and information about the enterprise enrolled on the Enabling Innovation project and any innovation support you have received from our partners.

- Through our Digital Services: Which are the NTU website at www.ntu.ac.uk and any other NTU-authorized internet services, websites, products, social media, mobile phone apps and/or software applications that enable you to use, access, view, listen to and/or download NTU content or to interact with us online (or through any other digital means) on any device. We collect information that you provide to us by filling out forms on the website or by corresponding with us through the Digital Services. It includes information that you provide when you participate in discussion boards or other social media functions within the Digital Services, enter a competition, promotion or survey, and when you report a problem with the Digital Services;
- Email or telephone correspondence you have with NTU.

If you receive grant funding for your project, we will collect payment information, such as financial or bank card information, and other information necessary for us to process the transaction. If the grant is in relation to the employment of a member of staff we may also collect salary information and supporting evidence through payslips, BACS reports and Bank statements.

Our servers, logs, and other technologies automatically collect certain information to help us administer, protect, and improve our Services; analyse usage; and improve users' experience.

We receive and store certain types of information whenever you interact with us. This includes the use of "cookies". Please refer to our [cookies policy](#) available for further information regarding our use of cookies. We may also automatically record visits to our website for the purposes of improving our services. These recordings may record mouse clicks, mouse movements, page scrolling and any text keyed into website forms. Information collected by cookies or session recordings is stored and is used for aggregated and statistical reporting.

NTU uses CCTV around campus, and will collect and store information. For full details of our CCTV use, please refer to our [CCTV Policy](#)

How we use data about you

We may share your personal information with third parties where required by law, where it is necessary to administer the working relationship with you or where we have another legitimate interest in doing so.

We use your personal information for the following purposes:

- For the administration of your involvement in The Enabling Innovation project.
- To provide you with information on products or services that you may request from us, or which we feel may be of interest to you, and where you have given consent for us to contact you for such purposes.
- To enable all financial transactions to and from us, including payments, grants and benefits;
- To carry out our contractual obligations with you which will include the operation and delivery of any services you have requested, deal with requests and enquiries;
- Where it is necessary to comply with a legal obligation;
- To provide management statistics through research;
- For security and safety (through the use of CCTV)
- To ensure that content from our website or Services is presented in the most effective manner for you and for your computer or device by gathering aggregate information about our users, using it to analyse the effectiveness and efficiency of communications;
- Where you have agreed for the purpose of consulting, informing and gauging your opinion about our products and services, for example; surveys or alumni activities

- To ensure we meet our statutory obligations, including those related to diversity and equal opportunity;
- To ensure compliance with the Prevent Duty under the Counter Terrorism & Security Act 2015;
- To notify you about changes to our services;

Who we share your data with

NTU shares or discloses personal information when necessary to provide Services or conduct our business operations. When we share personal information, we do so in accordance with data privacy and security requirements. We may occasionally share non-personal, anonymised or pseudonymised, and statistical data with third parties.

We may share your personal and company information with third parties where required by law, where it is necessary to administer the working relationship with you or where we have another legal requirement or legitimate interest in doing so. Third parties will only process your personal data on our instructions and where they have agreed to treat that information confidentially and to keep it secure.

Below are the parties with whom we may share personal information and why;

- Within NTU: Associated entities or services around the world are provided data by a variety of NTU teams and functions, and personal information will be made available to them if necessary for the provision of Services, account administration, marketing, for instance.
- Our business partners: We occasionally partner with other organisations to provide course/workshop content, host events, conferences, and seminars. NTU will handle personal information in accordance with this Privacy Notice, and we encourage you to review the privacy statements of our partners to learn more about how they collect, use, and share personal information.
- With our project evaluators SQW, who conduct evaluations of the Enabling Innovation project across the three Universities.
- Our third-party service providers: We partner with and are supported by service providers both in the UK around the world. Personal information will be made available to these parties only when necessary to fulfil the services they provide to us, such as registering, direct marketing services; advertising; data analytics, eJournals/eBooks, and delivery. Our third-party service providers are not permitted to share or use personal information we make available to them for any other purpose than to provide services to us.
- We may be required to use and retain personal information for legal and compliance reasons, such as the prevention, detection, or investigation of a crime; loss prevention; fraud or safeguarding.
- Nottingham Law School Legal Advice Centre Limited ;
- We may also use personal information to meet our internal and external audit or governmental requirements, information security purposes, and as we otherwise believe to be necessary or appropriate.
 - (a) Under applicable law, which may include laws outside your country of residence;
 - (b) To respond to requests from courts, law enforcement agencies, regulatory agencies, and other public and government authorities, which may include such authorities outside your country of residence;
 - (c) To enforce our terms and conditions; and
 - (d) To protect our rights, privacy, safety, or property, or those of other persons.

We may share information with third parties for marketing and advertising purposes. This may include such activities as activating Google Analytics Advertising Features, creating customer audiences via Facebook, Twitter, Snapchat and Google. We have

implemented the following Google Analytics Features: Create Remarketing Audiences (based on specific behaviour, demographic, and interest data and we will share those lists with AdWords and use demographic and interest data in your Google Analytics reports) and Create Segments based on demographic and interest data. Please refer to NTU's Cookies Policy for further details regarding our use of cookies. You can opt-out of the Google Analytics Advertising Features that we use including through Ad Settings (including Ad Setting for mobile apps) and any other available means (for example, the Network Advertising Initiatives consumer opt-out available at <http://optout.networkadvertising.org/#!/>). For further information please refer to <https://tools.google.com/dlpage/gaoptout/>.

How long we keep your data for

We will not store your personal information for longer than is necessary. NTU will ensure that our trusted partners and selected third parties with whom we share your personal information in accordance with this Privacy Notice will delete your personal information when they no longer require it.

In determining data retention periods, Enabling Innovation and NTU takes into consideration local laws, contractual obligations, and the expectations and requirements of our data subjects. When we no longer need personal information, we securely delete or destroy it. We expect that the document retention period for the 2014-2020 ESIF programme will be until 31st December 2033.

How we secure your data

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, agents, contractors and other third parties who have a business requirement to know.

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 to our clients and to protect our people and assets.
- Appropriate restrictions on access to personal information.
- Monitoring and 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.
- Vendor risk management.
- Contracts and security reviews on third-party vendors and providers of services.

How we keep your data secure in other countries

Your personal information may be transferred by us or our trusted partners outside of the European Economic Area (the "EEA"). The trusted partners that may do this are organisations who process data for analysis or marketing purposes, including a marketing automation hub where the email address of recipients will be logged and a record of email delivery, opening, click-through and bounce-backs will be kept. Our partner uses Microsoft's Windows Azure data centres located in East US (Virginia), West Europe (Netherlands), and Australia East (New South Wales).

NTU has networks, databases, servers, systems, and support located throughout the world. NTU collaborates with third parties such as cloud hosting services, suppliers, and technology support located around the world to serve the needs of the NTU, workforce, and students. Your personal information may be shared with record matching and customer targeting partners, including Google, Facebook, Snapchat and LinkedIn. Some of these partners process personal data in Canada and the United States of America. We take appropriate steps to ensure that personal information is processed, secured, and transferred according to applicable law. In some cases, we may need to disclose or transfer your personal information within NTU or to third parties in areas outside of your home country.

NTU shall ensure that your personal information transferred to countries outside of the EEA is adequately protected by transferring the personal information on terms of the standard data protection clauses adopted by the European Commission.

This means, your rights and protection remain with your data, ie: 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 our Data Protection Officer](#).

Your rights

We respect your right to access and control your information, and we will respond to requests for information and, where applicable, will correct, amend, or delete 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 and to check that we are lawfully processing it.
- **Request correction** of personal information that we hold about you. This enables you to ask us to correct any incomplete or inaccurate information we hold about you.
- **Request erasure** of your personal information in limited circumstances. This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing (see below).
- **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.

- **Object to any automated decision-making** about you which produces legal effects or otherwise significantly affects you.
- **Request the transfer** of your personal information to another party.

How to Contact us

If you are concerned about any aspect of your interaction with Enabling Innovation, please raise your concerns to the Enabling Innovation Programme Manager. Email contact: david.harper@ntu.ac.uk

Please contact us with any requests related to your personal information, or with any questions or queries you may have about this statement. Our DPO contact is: DPO@ntu.ac.uk

If you are not satisfied with how NTU manages your personal data, you have the right to make a complaint to a data protection regulator. The ICO contact details are: <https://ico.org.uk/global/contact-us/>