

Nottingham Trent University – Privacy Notice

BreakThrough Programme

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**”, “**we**”, “**us**” or “**our**”) does with your personal information, your rights and how we protect it. This notice applies to all individuals (“**you**” or “**your**”) involved in the BreakThrough Programme (the “**Programme**”).

The Programme is funded by the European Regional Development Fund under the Sustainable Urban Development Strategy Scheme and is an exclusive programme for micro and SMEs in Nottingham looking to bring their business vision to reality. The Programme is for businesses who are already trading and who have ambition and the potential to grow and who have a proven market opportunity. The Programme is a 3 month programme with a focus on providing valuable, practical and effective support to businesses delivered by the NTU Enterprise Team at the Dryden Enterprise Centre.

For more information about the Programme and the support available to businesses from NTU [visit our website](#).

Who we are

For the purposes of the UK GDPR, NTU is a “controller” which means we are responsible for deciding how we hold and use personal information about you.

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, or wish to exercise your rights, please contact:

NTU 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 personal information

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

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 – Data Protection Officer at DPO@ntu.ac.uk.

The personal information we hold on participants

As a participant (which can be a representative, owner/director of a business), you will be involved in the Programme. Depending on the nature of activities of the Programme, the following information for each participant may be collected:

- Name and address, telephone number;
- Employment contact details, such as job title, address, telephone number and email address;
- Date of birth;
- Equal opportunity and diversity monitoring information such as ethnicity, disability status, gender identity;
- Attendance and participation in the Project and supporting strands of the Project;
- Photographs where you are participating in Project activity.

In some circumstances, we collect, store and use “special categories” of more sensitive personal data, which may include:

- Health information including medical conditions and disability status – we may use health information to help us to make reasonable adjustments, to improve our service to you and to improve our service for future projects; to ensure our engagement with you is based on a suitable understanding of, and respect for, your particular circumstances.
- Race or ethnicity – we may use this information to support equal opportunity and monitoring/evaluation purposes for the Programme and other projects.

We will also collect business details that is not personal information, such as ownership details, registered company number, date of incorporation, name of employer and address, energy consumption and company turnover.

How we use your personal information

Initially, we will use your personal information to allow us or relevant third parties to assess you or your organisation’s eligibility for the Programme and carry out the 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 statistics through the research undertaken as part of the Programme and to assess the impact of this Programme in the evaluation of our programmes in general. This will be through anonymisation; you will not be able to withdraw consent with regard to participation in the Programme after this point.

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, tailor advertising for future Programmes/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 NTU 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 a 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 data with

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

In line with our requirements under the European Regional Development Fund, all personal information we collect may be shared with the Ministry for Housing Communities and Local Government ("**MHCLG**"). The MHCLG is the managing authority for the European Regional Development Fund programme in the UK. Such personal information may also be made available for audits by the MHCLG, the Directorates of the European Commission responsible for the European Regional Development Fund and the European Court of Auditors. Where personal information is shared with the MHCLG for monitoring and evaluation of the activities, the MHCLG shall process the personal information in accordance with the [European Regional Development Fund 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, Subsidy Control 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 data for

We will not store your personal information for longer than is necessary to fulfil the purposes for which we collected it. This may mean holding on to your personal information for a certain period of time after you have ceased to have a relationship with NTU, such as for the purposes of satisfying any legal, accounting, or reporting requirements for the Programme.

When determining the appropriate period of time to retain your personal information, we consider several factors, including the amount, nature, and sensitivity of the information, the potential risk of harm from unauthorised use or disclosure of your information, the purposes for which we handle and use your information and whether we can achieve those purposes through other means, and the applicable legal requirements. We securely erase your information once it is no longer needed.

NTU will ensure that selected third parties with whom we share your personal information in accordance with this Privacy Notice will retain your personal information in line with the requirements of the funding body and will delete your personal information when they no longer require it.

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 to our clients 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, where required.
- 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.

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 24 March 2022.