

INSTITUTE FOR SUSTAINABLE PRACTICE, INNOVATION, RESEARCH AND ENTERPRISE (INSPIRE)

PRIVACY STATEMENT

University of Wales Trinity Saint David (UWTSD) is the data controller and is committed to protecting the rights of clients and partners in line with the United Kingdom General Data Protection Regulation (UK GDPR). UWTSD has a Data Protection Officer who can be contacted through foi@uwtsd.ac.uk

This statement explains how the University handles and uses your personal information during your time as a prospective or existing client or partner of UWTSD and after our relationship completes. The University is committed to protecting your information and being transparent about what information it holds. The University has a range of data protection policies and procedures in place, which can be found at <https://www.uwtsd.ac.uk/about/strategies-and-policies/>

What information do we collect about you?

In addition to technical and business information you disclose to us to be able to support your enquiry/collaboration/advice, we collect the following personal information from individuals and organisations who wish to receive support or are partner with UWTSD:

- Name of organisation lead contact/ technical officers/ employees involved in the support/collaboration/contract;
- Work contact details of personnel involved in the support/collaboration/contract;
- Job role/title of personnel involved in the support/collaboration/contract;
- Contact details for colleagues and assistants to key staff.
- Preferred language of communication of contacts;
- Information about an individual's engagement with the university such as attendance at events and workshops, collaborative activity and research, consultancy, etc.
- Information gathered for the purposes of Equal Opportunities Monitoring, etc.
- Information relating to the provision of advice and support.
- Preferences on areas of interest for future communication and methods of contacting you.

UWTSD will collect information about you in the course of its dealings with you as a current or former client/partner. We may also receive information about you from outside the University such as from project partner organisations, e.g. Innovate UK, or UKRI. Your information will be managed appropriately by UWTSD and in accordance with the processing as outlined within the respective privacy statements. Where this happens, data will be held by INSPIRE and UWTSD and will be managed in accordance with this privacy statement. Where the same information is held by our project partners, we will be clear how they keep and manage your information by providing their privacy statement

Why do we collect personal information and how do we use it?

Although it is not possible to state every purpose for which your information will be used, the following are examples of how it is likely to be used while you are a client/partner.

1. To evaluate eligibility for University support according to funding compliance requirements and the University's project approval process;
2. To monitor and evaluate engagements at operation management and governance level;
3. To report to project funders and government data requests;
4. We may also collect information on your employees or organisation as part of the process to provide services or advice to your organisation and also as part of the Higher Education Business and Community Interaction statutory reporting requirement to HESA and other reporting bodies;
5. To statistically analyse the commercial relationships existing across UWTSD on a periodic basis.
6. To provide Corporate subscribers offers of services from UWTSD
7. In connection with the delivery of Research Projects/archiving activity as normally conducted by public organisations and in line with article 89 safeguards.

No direct marketing will be undertaken to you without an appropriate legal basis.

What is our legal basis for processing your information?

- (1) Where processing of personal data is necessary in order to provide you with a product or service, the processing is likely to be deemed necessary for the performance of your contractual agreement or in order to take steps at the request of the individual prior to entering into a contract. See UK GDPR Article 6(1)(b)
- (2) Some processing may be necessary for the pursuit of our legitimate interests or by a third parties legitimate interests see UK GDPR Article 6(1)(f) except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data. Recital 47 of the UK GDPR acknowledges that processing personal data for direct marketing purposes may be regarded as being carried out for a legitimate interest. However, such processing will only be carried out when a legitimate interests assessment has been carried out to ensure your personal data is used appropriately and in ways you would reasonably expect and which have a minimal privacy impact, or where there is a compelling justification for the processing.
- (3) The University will obtain consent from you (see UK GDPR Article 6 (1) (a)) to assist with a particular requirement (for example a dietary need or a mobility issue). Where this Special Category Data is shared it will only be in relation to the specified purpose (for example but not exclusively, an event

held by the University) and will be disposed of at the earliest opportunity thereafter.

- (4) Processing of your personal data may be necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the University (see UK GDPR Article 6(1)(e)) and for statistical and research purposes.

Who receives your information?

Your personal information will be stored on our secure electronic systems and databases and will be shared with relevant colleagues within the university on a need to know basis to provide you services and advice. Personal information is protected by the university and will not be disclosed to third parties without consent except when necessary as part of our contractual obligations e.g. to project funders or as permitted by law.

Information is made available to persons or organisations requiring access for the reasons outlined above. These include:

- University academic, technical and administrative staff;
- University operation governance and management boards;
- External funders and partners/advisors directly involved with your collaboration with UWTSD;
- The Welsh and UK Government through statistical returns e.g. Higher Education Statistics Agency, Higher Education Funding Council for Wales, etc.
- Any disclosures the University makes will be in accordance with Data Protection Legislation and your interests will be considered.

How long will your information be held?

Your personal data may be held for the duration of your engagement with UWTSD and for a reasonable period of time upon its conclusion to comply with regulatory audit and University record retention policies. Information held for research and archiving purposes may be kept for longer and in line with the [UK GDPR Article 89 safeguards](http://www.privacy-regulation.eu/en/article-89-safeguards-and-derogations-relating-to-processing-for-archiving-purposes-the-public-interest-scientific-or-hi-GDPR.htm). <http://www.privacy-regulation.eu/en/article-89-safeguards-and-derogations-relating-to-processing-for-archiving-purposes-the-public-interest-scientific-or-hi-GDPR.htm>

How your personal information is stored?

Data Protection legislation requires us to keep your information secure. This means that your confidentiality will be respected, and all appropriate measures will be taken to prevent unauthorised access and disclosure. Only members of staff who need access to relevant parts or all of your information will be authorised to do so. Information about you in electronic form will be subject to password and other

security restrictions, saved on university secure networks, while paper files will be stored in secure areas with controlled access.

Some processing may be undertaken on the University's behalf by an organisation contracted for that purpose. Organisations processing personal data on the University's behalf will be bound by an obligation to process personal data in accordance with Data Protection legislation.

What are your rights?

You have a right to access your personal information, to object to the processing of your personal information, to rectify, to erase, to restrict and to port your personal information (please note however that this is likely to affect our ability to provide support to you in the most effective way, if at all). If you have provided consent to UWTSD to process any of your data, then you also have a right to withdraw that consent. Any requests or objections should be made in writing to the University Data Protection Officer:-

Paul Osborne
Data Protection Officer
University of Wales Trinity Saint David
Mount Pleasant, Swansea, SA1 6ED
foi@uwtsd.ac.uk
01792 481000

How to make a complaint

If you are unhappy with the way in which your personal information has been processed, you may in the first instance contact the University Data Protection Officer using the contact details above.

If you remain dissatisfied, then you have the right to apply directly to the Information Commissioner for a decision. The Information Commissioner can be contacted at: -

Information Commissioner's Office,
Wycliffe House,
Water Lane,
Wilmslow,
Cheshire,
SK9 5AF
www.ico.org.uk

Your responsibilities

Please advise of any changes to your name, address, contact details, etc. as soon as practically possible so that we can amend our records accordingly.

You should not use your relationship and collaboration with UWTSD for any press or marketing purposes without the express consent of UWTSD.

Consequences of not providing your information

The consequences of not providing your information when it is requested for the performance of a contract or in order to take steps at the request of the individual prior to entering into a contract, would mean that the University will not be able to offer you some and indeed possibly none of its products and services.

Changes to our Privacy Policy

Any changes we make to our privacy policy in the future will be posted on this page . Please check frequently to see and updates or changes to our privacy policy.

Consent to Receive Electronic Marketing

As a valued contact of RIES at UWTSD, we want to be transparent with you that your data is held in our Relationship Database. Your details have been identified either through contact with UWTSD or through our relationship development activities.

Your information is held by INSPIRE in line with our University Data Protection Policy which can be viewed through the link below.

<https://www.uwtsd.ac.uk/about/strategies-and-policies/>

Your information is held to enable us to correspond with you, answer your enquiries and to provide guidance and advice.

In line with legislation we will always give you the opportunity to opt out of future relevant electronic marketing from INSPIRE .

To opt out from receiving direct marketing correspondence from INSPIRE please email

Business@uwtsd.ac.uk

UWTSD is designated as public authority for the purposes of the **Freedom of Information Act 2000** and **Environmental Information Regulations 2004** and is therefore subject to receiving requests for recorded information. Freedom of Information or Environmental Information requests will be responded to by the University under its statutory obligations and in line with the provisions of the relevant legislation.