

Northumbria Enterprise & Business Support 2 Privacy Notice

1. Data Controller

The University of Northumbria at Newcastle (“we”, “our”, “us”) is registered as a Data Controller (Registration Number: **Z7674926**) with the Information Commissioners Office for the purpose of processing personal data. We are committed to processing personal data in accordance with our obligations under the General Data Protection Regulation (GDPR) and related UK data protection legislation.

2. Overview

This privacy notice specifically relates to personal data processed by the Northumbria Enterprise & Business Support 2 (NEBS2), project reference 25R19P03917, through its funded activities. NEBS2 is delivered by The University of Northumbria at Newcastle and funded by the European Regional Development Fund (ERDF). The Managing Authority for ERDF is the Department for Levelling Up, Housing and Communities (DLUHC). DLUHC processes information in accordance with their [ERDF Privacy Notice](#).

This privacy notice describes how and why we process personal information in relation to graduates, students and employers registered with, or benefiting from the services provided by NEBS2.

This notice also explains how you can control how we use your information in accordance with your rights under relevant data protection legislation.

3. Where do we get your personal data from?

For Graduates and Students

- Expressions of interest, including via the University website, emails, telephone calls, referrals from non-NEBS 2 project staff across the University known to the graduate, events, business cards
- Application forms for support
- Intern Details Form, part of the legal documentation
- Employer submission of salary/payroll information to enable payment of grant by university to employer and for the fulfilment of ERDF requirements such as for project achievements/outputs and evaluation purposes
- Evidence and information provided by the graduate
- CV’s and applications for vacancies and other opportunities
- Evaluation forms
- Project forms to evidence output achievements
- Consent forms for images
- Information collected/consented by the employer to support the promotion of the project
- University’s student records which the graduate can update at any time
- Communications usually via email and/or telephone in relation to progression of the above

For Employers

- Expressions of interest, via website, emails, telephone calls, referrals from 3rd parties, events, business cards
- Application form
- Legal agreement



European Union

European Regional
Development Fund



**Northumbria
University**

NEWCASTLE

- Submission of bank account details
- Evaluation forms
- Project forms to evidence output achievements
- Consent forms for images
- Information collected/consented by the employer to support the promotion of the project
- Quotations and tender document requested by the NEBS project to support and enhance project delivery such as marketing materials, external project evaluator
- Communications usually via email and/or telephone in relation to progression of the above

4. Categories of personal data we process –

For Graduates and Students	For Employers
<ul style="list-style-type: none"> • Biographical information • Contact information • Employment related information, including employment history • Academic history • Special category information including Ethnic origin, Gender, Age Range, Whether consider has disability (including Dyslexia) • Personal images • Pay and other information included on their employer’s payslip such as National Insurance Number and Tax Code • Project engagement records (e.g. support provided, duration of support, attendance, evaluation) 	<ul style="list-style-type: none"> • Biographical information • Contact information • Personal images • Project engagement records (e.g. support provided, duration of support, attendance, evaluation, quotes/tendering documentation)

5. The lawful basis for Processing –

The University relies on the following legal bases to process information about you:

We will process data because you give us your **consent**, for example to respond to your enquiries or to send you marketing information in relation to opportunities that we believe will be of interest to you.

We also process data to meet our **contractual** duties to you and provide you with access services, facilitate employment or support you project.

We also process data to meet our **public tasks** and legal requirements, specifically for ERDF and DLUHC statutory reporting.

We may process special category data meet our **substantial public tasks** and legal requirements, specifically for ERDF and DLUHC statutory reporting.

6. Activities we process personal data for

For Graduates and Students

- Registration with project activities
- Management of enquiries



European Union

European Regional
Development Fund



**Northumbria
University**

NEWCASTLE

- To determine eligibility and suitability to participate in the project
- Delivery of project activities – internship and business support/advice
- Referrals to external specialist advisors to provide bespoke advice and guidance (e.g. marketing, finance)
- Completion of legal documentation
- Processing financial information to enable payment of grant to employer
- Marketing events, relevant vacancies and project opportunities
- Sharing information with an employer via your online application
- Event registration and management
- Carry out research and to produce statistics for internal reporting
- Evaluation forms and evidence gathering to demonstrate project activities and achievements
- To provide DLUHC with the required evidence to demonstrate project activities as part of grant claims processes, including summative assessment
- To meet the project funders' contractual requirements, including State Aid
- To provide an opportunity to engage with other non-project University activities, including beyond the end date of support and/or the NEBS2 project

For Employers

- Registration with project activities
- Management of enquiries
- To determine eligibility and suitability to participate in the project
- Delivery of project activities – internship and business support/advice
- Completion of legal documentation
- Processing financial information to enable payment of grant to employer
- Promotion of your internship and other opportunities to graduates, students and staff of the University.
- Marketing events, relevant vacancies
- Sharing information with graduates and students via our online processes
- Event registration and management
- Carry out research and to produce statistics for internal reporting
- Evaluation forms and evidence gathering to demonstrate project activities and achievements
- To provide DLUHC with the required evidence to demonstrate project activities as part of grant claims processes, including summative assessment
- To meet the project funders' contractual requirements, including State Aid
- To provide an opportunity to engage with other non-project University activities, including beyond the end date of support and/or the NEBS2 project
- Quotations and tender document requested by the NEBS project to support and enhance project delivery such as marketing materials, external project evaluator

As part of Research Excellence Framework www.ref.ac.uk, UK universities' research quality is assessed every seven years. Your responses might be used by researchers from the Northumbria University to assess the benefits that their research had on society. If you provide contact details, you may be contacted at a future time by Northumbria University staff with follow up questions.

7. Automated individual decision making, including profiling

Your personal data will not be subjected to automated decision making.

8. How personal data is stored securely



European Union

European Regional
Development Fund



**Northumbria
University**

NEWCASTLE

We have implemented appropriate physical, technical, and organisational security measures designed to secure your personal data against accidental loss and unauthorised access, use, alteration, or disclosure. In addition, we limit access to personal data to those employees, agents, contractors, and other third parties that have a legitimate business need for such access.

We utilise many different storage solutions and IT systems, some of which are outsourced to third party providers:

- GTI Media TARGETConnect;

Where processing takes place with these external third parties, processing takes place under an appropriate agreement outlining their responsibilities to ensure that processing is compliant with the Data Protection legislation and verified to be secure

Personal data is transferred to DLUHC by an electronic portal, and to DLUHC via project specific OneDrive and/or SharePoint access only accessible by DLUHC Contract Manager and their claims and compliance staff.

9. Who do we share your information with?

As the data controller we share project information, including all or some of your personal data, with the funder, DLUHC. To fulfil project contractual obligations information may also be shared with the national evaluator of the ERDF programme. In some cases, the national evaluator (i.e. independent external contractors commissioned by DLUHC), may contact a sample of direct or indirect beneficiaries for the purpose of the National Evaluation of the programme. DLUHC processes information in accordance with their [ERDF Privacy Notice](#).

We do not share the information you provide to us outside of the European Economic Area (EEA) or with other parties unless there is a lawful basis to do so. This could include internal University appointed verifiers and auditors, academic and administrative staff, and Government or European Union Auditors.

10. Sharing your Personal Data with Third Parties

Personal data collected under this privacy notice is shared with the system hosting companies detailed in section 8 above on a closed system. This includes where employers targeting Northumbria by posting their job vacancies. We also use this information for the delivery and organisation of careers focused events.

Employers should please note that where a multiple number of employers from the same organisation have registered, your colleagues may be able to see your name, job title, telephone number and email address. We are sharing data with DLUHC and their representatives. We are also sharing contact and project engagement information with the project appointed evaluator and contact information with the following project appointed external specialist advisors:

- RMT Accountants & Business Advisors Ltd
- Sphera Consulting Ltd
- Mincoffs Solicitors LLP
- Stand-up Marketing
- CAL Partners Ltd
- First Face to Face Ltd
- Lever Development Ltd
- 49 Digital Ltd (trading as Helena Hill Consulting)

11. Transfers to countries outside of the European Economic Area (EEA)

Some Partners and IT services providers are based in countries outside of the EEA. We only transfer data to outside the EEA where “appropriate safeguards” are put in place through contract, where the European Commission has agreed that data protection provisions of a country offer adequate levels of protection; or where you have given your explicit consent.

12. How long personal data held by Northumbria University

We will not keep your personal data for longer than we need. As a minimum, we will retain data for two years after the closure of the 2014-2020 ERDF programme in line with the European Regional Development Fund document retention guidance to ensure the University meets reporting obligations and to demonstrate compliance with EU requirements. Current DLUHC guidance suggests this date as December 2033. This Privacy Notice will be updated to reflect changes in the forecast destruction date and/or when the actual destruction date is confirmed. So to demonstrate project activities, including compliance with ERDF regulations, this also applies to businesses, graduates and students that apply for support from the project that are unsuccessful as well as those that quote or tender for work through the project where their bids, quotes (or similar) are not selected.

In the small number cases where we receive applications for internship vacancies on behalf of the business, we will delete the CVs, covering letters and any other information submitted no later than the end of the project (30 June 2023). Similarly, any project mailing lists created specifically for graduates and/or students to receive information about opportunities available through the project will be deleted no later than the 30 June 2023.

If requested, we will remove personal data that does not hinder our ability to comply with EU requirements. The name of the business will not be deleted, unless the name of the business (e.g. a sole trader) is the same or similar to the name of the person requesting deletion of their personal data. In these circumstances, the full postcode the business will be retained until all project records are deleted as outlined above.

13. Your Rights under GDPR

Under the GDPR, you have a number of rights in relation to the processing of your personal information, each of which may apply to differing degrees’ dependent upon the nature of the processing and the legal basis for it. You have the right to:

- Be informed as to how we use your data (via this privacy notice)
- Request access (a copy) of the personal information that we hold about you.
- Correct inaccurate or incomplete data
- Request that we stop sending you direct marketing communications.

In certain circumstances, you may also have the right to:

- Ask to have certain data ‘erased by us.
- Request that we restrict certain processing of your personal data.
- Request that we provide any data you submitted to us electronically be returned to you or passed to a third party as a data file.
- Object to certain processing of your personal data by us

In order to exercise any of the above rights, please contact the Data Protection Officer and/or DLUHC. For more information about any of the above please see the GDPR pages of our website or the DLUHC website.

14. Data Protection Officer

The Data Protection Officer (DPO) for Northumbria University can be contacted via email at dp.officer@northumbria.ac.uk or you can call +44 (0)191 243 7357

15. Lodging a Complaint with the Information Commissioners Office (ICO)

If you are dissatisfied with our processing of your data, or a response to a complaint you have made to us about it, you have the right to complain to the ICO.

Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF, and Telephone: 0303 123 1113 (local rate) or 01625 545 745 Email: casework@ico.org.uk

For more information see [Information Commissioner's web site](#).