

Last Updated 9th November 2018

This privacy policy sets out how New Anglia Local Enterprise Partnership (LEP) uses and protects any information that you provide to New Anglia LEP and its delivery partners.

Data Controller and Data Processor

As Data Controller and Data Processor, New Anglia LEP is responsible for ensuring that customer data, including any Personal Data, that it holds is accurate and, where necessary, kept up to date.

New Anglia LEP will ensure that individuals have access rights to their data as required by the General Data Protection Regulation (2016/679) and Data Protection Act 2018.

As the Data Controller, New Anglia LEP's Data Protection Officer oversees the use of data within the LEP and has the right to enforce any legal requirements contained within the General Data Protection Regulation (2016/679) and Data Protection Act 2018.

Use and Storage of Data

In accordance with Article 5(2) of the General Data Protection Regulations, New Anglia LEP adheres to the following principles when storing and processing data: -

- Data is collected for specified, explicit and legitimate purposes and will not be processed in a manner that is incompatible with the original purpose(s) for which the data was collected.
- Data is stored and processed lawfully, fairly, and in a transparent manner, in relation to individuals.

- We use appropriate technical or organisational measures to ensure that there is appropriate security in place for any personal data; this includes protection against unauthorised or unlawful processing and against accidental loss, destruction or damage.
- The data we collect is as accurate as possible and, where necessary, kept up to date.
- Data is kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data is processed.
- All reasonable steps are taken to ensure that inaccurate personal data is erased or rectified without delay.
- Data may be used for further processing and archiving purposes in the public interest, or for scientific, historical research or statistical purposes.
- Personal data may be stored for longer periods insofar as the personal data will be processed solely for archiving purposes in the public interest, scientific or historical research and/or statistical purposes, subject to implementation of the appropriate technical and organisational measures, required by the GDPR, in order to safeguard the rights and freedoms of individuals.

Personal Data Collected

New Anglia LEP has contracts with Government Departments to deliver a range of business support programmes and grant schemes, several of which are delivered in partnership with other organisations and Local Authorities.

As part of the operation of these programmes/schemes, New Anglia LEP processes personal data according to the following lawful basis:

Article 6(1)(e) of the General Data Protection Regulation “Processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller”.

The lawful basis for controlling or processing ‘special category’ data is:

Article 9(2)(g) of the General Data Protection Regulation “Processing is necessary for reasons of substantial public interest, on the basis of Union or Member State law which shall be proportionate to the aim pursued, respect the essence of the right to data protection and provide suitable and specific measures to safeguard the fundamental rights and the interests of the data subject”.

Depending on the nature of activities or support provided by New Anglia LEP and its delivery partners, the following information may be collected and may be shared with delivery partners and Government Departments for the purposes of reporting and monitoring:

1. name of contact
2. job role
3. company name (legal and trading)
4. business sector/activity/SIC code
5. location/address/relevant local authority
6. email address
7. public IP address
8. phone number (including mobile)
9. date and time of enquiry
10. business status
11. business ownership
12. business size
13. business turnover
14. staffing numbers (including apprentices)
15. business Companies House registration number, VAT, PAYE
16. date of incorporation
17. start date of trading
18. financial information (historic, current and forecasts) required for assessment of business support
19. enquiry source
20. reason for contacting the partner
21. outcome of any advice given
22. details relating to the support given and/or provided
23. correspondence with businesses/individuals related to business support services
24. ethnicity
25. disability
26. gender
27. age
28. labour market status
29. pay details

Information Being Shared

As part of the operation of New Anglia LEP's business support programmes and grant schemes, a shared CRM System has been developed by New Anglia LEP to enable business support and delivery partners across Norfolk and Suffolk to:

- facilitate the delivery, coordination and management of business support services to customers (Individuals, Small and Medium-sized Enterprises (SMEs) as well as Large Companies) across the counties of Norfolk and Suffolk;
- provide support to inward investment opportunities in line with the objectives outlined in the Norfolk and Suffolk Economic Strategy;
- contact customers about business support services that can be accessed through the New Anglia Growth Hub (delivered by Suffolk Chamber of Commerce on behalf of New Anglia LEP).

Your details will be used to support research and evaluation activities, with New Anglia LEP sharing all, or some of, your personal data with organisations to undertake independent external audits and evaluations of activities, to assess the effectiveness of the support provided, as well as ensuring that U.K. and E.U. law, rules and regulations have been fully complied with. Such organisations may be appointed by New Anglia LEP and/or the Ministry of Housing and Local Government; the Department for Businesses, Energy and Industrial Strategy; other Government Departments and/or the European Commission.

New Anglia LEP will not give any personal data to any other organisation(s) unless required for the purpose of audit and/or evaluation. In such circumstances, where possible, New Anglia LEP will remove the details that might identify individuals personally and will instruct the organisations undertaking the audit and/or evaluation not to use the data to contact individuals for any reasons unconnected with the audit and/or evaluation process.

Freedom of Information Act 2000

As a Company Limited by Guarantee we are not formally subject to the Freedom of Information Act 2005. However we recognise the importance of accountability and transparency and voluntarily adhere to this legislation. We respond to Freedom of Information requests in the same way as organisations which are formally bound by the legislation and always seek to make information available wherever possible.

Withdrawal of Individual's rights

Under Article 6(1)(e) and Article 9(2)(g) of the General Data Protection Regulation, participants in New Anglia LEP's business support programmes and grant schemes are unable to claim the following rights in terms of personal data:

- the right to erasure ("right to be forgotten")
- the right to portability of their data

However, the data collected is your personal data, and you have the right, subject to lawful data requirements:

- to see what data we have about you
- to ask us to stop using your data
- to ask us to delete your data, or to correct your data if there is no longer a justification to process it
- to lodge a complaint with the independent Information Commissioner (ICO) if you think we are not handling your data fairly or in accordance with the law.

Data Retention

Contracts with several Government Departments, including contracts with the Ministry of Housing and Local Government, and the Department for Business, Energy and Industrial Strategy, stipulate that data and evidence must be kept for a specified period after support has been provided by New Anglia LEP and its partners. In the case of one of these contracts, data and evidence must be kept until the end of the year 2036.

Destruction of Information

In accordance with the General Data Protection Regulation (2016/679) and Data Protection Act 2018, any data no longer required for the purposes that it was held for will be destroyed. This means that New Anglia LEP will destroy all hard copy and electronically stored information using secure methods that comply with all data protection regulations in force at the time of destruction.

Data Breaches

In the case of a data security breach, New Anglia LEP will immediately take steps to contain the breach. Where a serious breach is encountered, New Anglia LEP, as Data Controller, will notify the Information Commissioner's Office and launch an investigation to establish the reasons behind the breach. New Anglia LEP is permitted to take all reasonable corrective steps as resulting from a security breach, including suspending use of any systems and/or withholding joint working with delivery partners.

Automated decision making

New Anglia LEP does not use personal data to undertake automated decision making.

New Anglia LEP Contact Details

If you would like further information please contact:

Jason Middleton
Data Protection Officer
New Anglia Local Enterprise Partnership
Centrum
Norwich Research Park
Colney Lane
Norwich
Norfolk
NR4 7UG

Tel: 01603 510070

Email: jason.middleton@newanglia.co.uk

Information Commissioner's Office Contact Details

The Information Commissioner's Office is the UK's independent authority set up to uphold information rights in the public interest, promoting openness by public bodies and data privacy for individuals:

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

Tel: 0303 123 1113

Website: www.ico.org.uk