



# The Privacy Notice for Skills for Growth – SME Skills Support

Version: v2

Date: December 2020

## INTRODUCTION

We recognise the importance of the privacy and security of your personal information and this privacy notice explains what we do to look after your personal data.

It tells you:

- Where and how we collect your personal information
- What we do with your information and how we keep it secure
- What your privacy rights are and how the law protects you
- How we look after your personal data
- Your rights over any personal information we hold about you
- How to contact us with any queries that you have

You can read the policy below to find out how we manage your information.



## 1. IMPORTANT INFORMATION AND WHO WE ARE

### a. What does this privacy notice cover?

This privacy notice applies to you if you are using the services provided as part of Skills for Growth – SME Skills Support. Whether this is online, by phone, in person, through written forms, through mobile applications or otherwise by using any of our websites or interacting with us on social media.

This privacy notice is our commitment to protect your personal information and explains what will be done with your personal information and how this meets the requirements set out in the Data Protection laws.

It is important that you read this privacy notice together with any other privacy information we may provide when we are collecting or using your personal data.

### b. Who is providing Skills for Growth – SME Skills Support?

Skills for Growth – SME Skills Support programme is a service being provided by The Growth Company and is funded by The Greater Manchester Combined Authority.

The Growth Company is a not-for-profit organisation which drives business, economic, personal and professional development within communities by boosting employment, skills, investment and enterprise for the benefit of all. To achieve this, The Growth Company is made up of different legal entities. Details of these companies, and the brands by which you recognise them, can be found [here](#).

We have appointed a Data Protection Officer (DPO) who is responsible for overseeing any processing of data in relation to this programme. If you have any questions about this privacy notice, including any requests to exercise your legal rights, please contact the DPO using the details set out below.

The Skills for Growth – SME Skills Support programme is being funded by the Greater Manchester Combined Authority (GMCA). The GMCA is made up of the ten Greater Manchester councils and the GM Mayor, who work with other local services, businesses, communities, and other partners to improve the city-region.

The Growth Company and the GMCA will be considered Data Controllers for your data that is used to provide and evaluate the Skills for Growth – SME Skills Support programme.

### c. Contact us

If you would like to exercise one of your rights as set out in this privacy notice, or if you have any questions or complaints about the way your personal information is used, please contact The Growth Company by one of the following means:

By email: [DPOfficer@growthco.uk](mailto:DPOfficer@growthco.uk)

By post: Data Protection Officer, The Growth Company, Lee House, 90 Great Bridgewater Street, Manchester M1 5JW

You also have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues. Go to [ico.org.uk/concerns](https://ico.org.uk/concerns) to find out more. We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

### d. Changes to this privacy notice and your duty to inform us of changes

This version was last updated in December 2020.



If there are any changes to how your data is used we will update this privacy notice and inform you of those amendments.

It is also very important that the personal data we hold about you is accurate and up to date. Please keep us informed if your personal data changes during your relationship with us.

#### e. Third Party Links

Our website and other documents you receive from us may include links to third-party websites, plug-ins and information. Following these links may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements.

## 2. THE DATA WE COLLECT ABOUT YOU

Personal data, or personal information, relates to any information from which an individual can be identified.

As part of Skills for Growth – SME Skills Support we will collect, use, store and transfer different categories of your personal data. We have explained these categories below (with examples of each data type):

- Identity Data includes first name, maiden name, last name, username or similar identifier, marital status, title, date of birth, place of birth, age, image, nationality, national insurance number, information taken from identification documents such as your passport or driving licence and gender.
- Contact Data includes home address, billing address, delivery address, email address and telephone numbers.
- Financial Status Data includes financial position, benefits received, credit status, housing status.
- Employment & Educational Data includes job title, qualifications, employment status, references, business interests, employment records and salary.
- Technical Data includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access this website.
- Profile Data includes your username and password, your interests, preferences, feedback and survey Skills for Growth – SME Skills Support responses.
- Usage Data includes information about how you use our website, products and services.
- Marketing and Communications Data includes your preferences in receiving marketing from us and our third parties and your communication preferences.
- Special Category Data includes health information, racial or ethnic origin.

We also collect, use and share **Aggregated Data** (statistical or numerical data). Aggregated Data may originate from your personal data but is not considered personal data in law, as this data does **not** directly or



indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. That percentage number would be Aggregated Data.

If you fail to provide personal data:

Where we need to collect personal data by law, or under the terms of a contract we have with you, we may not be able to carry out the performance of said contract if you fail to provide that data when requested. In this case, we may have to cancel a product or service you have with us but we will notify you if this is the case at the time.

### 3. HOW WE USE YOUR PERSONAL DATA

We will use your personal data to enable us to deliver a service and evaluate the effectiveness of Skills for Growth – SME Skills Support. Most commonly, we will use your personal data in the following circumstances:

- Where we need to perform the contract we are about to enter into or have entered into with you.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal or regulatory obligation.
- Where the GMCA need data to evaluate the effectiveness of the Skills for Growth – SME Skills Support programme.
- Where it is necessary to provide your data to ensure funding payments.

We may also send direct marketing communications to you via email or text message. However, we would ask you if you wanted to receive these before we sent you any. You have the right to withdraw consent to marketing at any time by contacting us.

We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the lawful bases we will use to do this. We have also identified what our legitimate interests are where appropriate.

Note that we may process your personal data for more than one lawful basis depending on the specific purpose for which we are using your data. Please Contact us if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

#### The Growth Company

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To register you as a new customer or supplier or participate in a procurement opportunity	a) Identity b) Contact c) Payment d) Financial Status e) Employment & Educational	a) Performance of a contract with you b) Necessary for our legitimate interests in developing our relationship with you as a potential client



<p>To deliver agreed services to you (or prepare for their delivery)</p>	<ul style="list-style-type: none"> <li>a) Identity</li> <li>b) Contact</li> <li>c) Profile</li> <li>d) Financial Status</li> <li>e) Technical</li> <li>f) Usage</li> <li>g) Marketing &amp; Communications</li> <li>h) Special Category Data</li> </ul>	<ul style="list-style-type: none"> <li>a) Performance of a contract with you</li> <li>b) Necessary for our legitimate interests in delivering a service we offer</li> <li>c) Substantial public interest (Special Category Data)</li> </ul>
<p>To manage our relationship with you which will include:</p> <ul style="list-style-type: none"> <li>a) Managing your account and providing services support</li> <li>b) Notifying you about changes to our terms or privacy notice</li> <li>c) Asking you to leave a review or take a survey for Skills for Growth – SME Skills Support</li> </ul>	<ul style="list-style-type: none"> <li>a) Identity</li> <li>b) Contact</li> <li>c) Profile</li> <li>d) Marketing and Communications</li> <li>e) Financial Status</li> </ul>	<ul style="list-style-type: none"> <li>a) Performance of a contract with you</li> <li>b) Necessary to comply with a legal obligation</li> <li>c) Necessary for our legitimate interests in keeping our records updated and studying how customers use our products/services)</li> </ul>
<p>To use data analytics to measure and report on the performance of our services</p>	<ul style="list-style-type: none"> <li>a) Identity</li> <li>b) Contact</li> <li>c) Usage</li> <li>d) Profile</li> </ul>	<ul style="list-style-type: none"> <li>a) Performance of a contract with you</li> </ul>
<p>To administer our day-to-day business operations, including (i) enabling you access our facilities and/or services, (ii) meeting our legal obligations in carrying out our business, (iii) assessing applications to deliver services to us, and (iv) appointing oversight bodies to govern and advise on our activities</p>	<ul style="list-style-type: none"> <li>a) Identity</li> <li>b) Contact</li> <li>c) Financial Status</li> <li>d) Payment</li> </ul>	<ul style="list-style-type: none"> <li>a) Performance of a contract with you</li> <li>b) Necessary for our legitimate interests in ensuring our business functions are cost-effective, compliant and accessible</li> </ul>



<p>To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data), including measure or understand the effectiveness of our website and products / services</p>	<p>a) Identity b) Contact c) Profile d) Usage e) Marketing &amp; Communications f) Technical</p>	<p>a) Necessary to comply with a legal obligation b) Necessary for our legitimate interests (i) in running our business, providing administration and IT services, ensuring network security, preventing fraud and in the context of a business reorganisation or group restructuring exercise, (ii) in studying how customers use our products/services, to develop them, to grow our business and to inform our marketing strategy</p>
<p>To make suggestions and recommendations to you about goods, services, opportunities or events that may be of interest to you</p>	<p>a) Identity b) Contact c) Technical d) Usage e) Profile f) Marketing &amp; Communications</p>	<p>a) Necessary for our legitimate interests in developing our products/services and growing our business b) Your consent, where this is required by law</p>

**Greater Manchester Combined Authority**

Purpose/Activity	Type of data	Lawful basis for processing
<p>To evaluate the effectiveness of the programme.</p>	<p>a) Identity b) Contact c) Profile d) Financial Status e) Employment &amp; Educational f) Special Category data</p>	<p>a) Performance of a task in the public interest For Special Category Data b) Necessary for reasons of substantial public interest</p>

**4. DISCLOSURES OF YOUR PERSONAL DATA**

We may have to share your personal data with the parties set out below for the purposes set out in the table in paragraph 3 above.

- Internal Third Parties as set out in the Glossary.
- External Third Parties as set out in the Glossary.
- The Greater Manchester Combined Authority (GMCA) and agents appointed by the GMCA.



We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

## 5. RESEARCH AND EVALUATION

As part of the Skills for Growth – SME Skills Support programme your data will be provided to the GMCA as the organisation funding the programme, so they can do their own review. GMCA will be looking to see how well the programme has worked for the people that have taken part. GMCA will then use this information to improve and identify the best services to fund across all of Greater Manchester. This information is sometimes shared with other research organisations; however, it cannot be used to identify you.

None of the work produced as part of the GMCA evaluation will be used to make any decisions about you. It will only be used for improving the quality, effectiveness and delivery of help across Greater Manchester.

The GMCA has commissioned another organisation to carry out this research and evaluation on their behalf. The organisation that is doing the research may want to contact you to provide additional information, via focus groups, telephone interviews or feedback forms. Supporting the GMCA with this evaluation research can have many benefits and your participation with the additional contact is greatly appreciated.

Being part of the research is a necessary part of the Skills for Growth – SME Skills Support programme. If you do not want to take part in the research, unfortunately this will affect your ability to receive the Programme services.

The GMCA has a contract with the organisation that is doing the research, which makes them legally responsible to look after your information properly and ensure that it is kept securely and only the right people can see and use it for the research.

## 6. INTERNATIONAL TRANSFERS

None of your data as part of the Skills for Growth – SME Skills Support Programme will go outside of European Economic Area.

## 7. DATA SECURITY

We and the GMCA have put in place appropriate security measures to prevent your personal data from being accidentally lost, altered, disclosed or accessed in an unauthorised way. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

## 8. DATA RETENTION

How long will you use my personal data for?



We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for personal data, we consider the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data, and whether we can achieve those purposes through other means, and the applicable legal requirements.

Type of Information	Length of time
Your Skills for Growth – SME Skills Support – SME Skills Support Client File	10 Years from date of last intervention
Your GMCA evaluation and monitoring data.	10 Years from end of contract.

In some circumstances you can ask us to delete your data: see Request erasure below for further information.

In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

## 9. YOUR LEGAL RIGHTS

Under certain circumstances, you have rights under data protection laws in relation to your personal data. Please refer to the Glossary below to find out more about these rights:

- Request access to your personal data
- Request correction of your personal data
- Request erasure of your personal data
- Object to processing of your personal data
- Request restriction of processing your personal data
- Request transfer of your personal data
- Right to withdraw consent

If you wish to exercise any of the rights set out above, please contact the DPO.

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

We try to respond to all requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.



## 10. GLOSSARY

### a. Lawful Basis

- **Legitimate Interest** means the interest of our business in conducting and managing our business to enable us to give you the best service/product and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by Contacting us
- **Performance of Contract** means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.
- **Comply with a legal or regulatory obligation** means processing your personal data where it is necessary for compliance with a legal or regulatory obligation to which we are subject.
- **Consent** means any freely given, specific, informed and unambiguous indication of your wishes by which you, by a statement or by a clear affirmative action, signify agreement to the processing of personal data.
- **Public Task** means processing your data in line with the exercising of an official authority (for example, the GMCA's tasks, functions, duties or powers) which is laid down by law.
- **Substantial Public Interest** means processing your data in line with the exercising of an official authority (for example, the GMCA's tasks, functions, duties or powers) that will provide substantial public interest benefits.

### b. Third Parties

#### Internal Third Parties

Other companies in The Growth Company group acting as joint controllers or processors and who are based in the United Kingdom and provide corporate services including IT and system administration, HR, Marketing and Financial services and undertake management reporting. This is in order that we can provide a high quality service across our group.

#### External Third Parties

We may transfer your personal information to our partners, suppliers, insurers and agencies, but only where they meet our standards of data and security. We only share information which allows us to provide their services to us or facilitate them providing our services to you. Examples include:

- Funding, delivery partners and licensing bodies who require information in relation to the services that we provide.
- Consultants and other advisors who deliver services as a subcontractor or on our behalf.
- Service providers who provide professional services to us and those who provide IT and other system administration and/or management services.
- Professional advisers acting as processors or joint controllers including lawyers, bankers, auditors and insurers who provide consultancy, banking, legal, insurance and accounting services.
- HM Revenue & Customs, regulators and other authorities acting as processors or joint controllers who require reporting of, or access to, processing activities in certain circumstances.



## Your legal rights

You have the right to:

- Request access to your personal data (known as a “data subject access request”). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
- Request correction of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.
- Request erasure of your personal data. This enables you to ask us to delete or remove personal data 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 data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.
- Object to processing of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.
- Request restriction of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data’s accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.
- Request the transfer of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.
- Withdraw consent at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.