

# GDPR POLICY

25/05/18 – Version 1

Harwell Science & Innovation Campus

Harwell

## Harwell Campus Privacy Notice – May 2018

This notice is to enable you to understand how we collect, protect and use your data

### Contents

1. Who we are
2. What personal data we collect and store about you
3. What we do with your data
4. Where we store your data and keep it safe
5. How your data is used in relation to third parties
6. Your rights in relation to the holding of your data
7. Legitimate Interest
8. Compliance with laws
9. Consent
10. Do we share your personal data?
11. Do you need to provide us with your personal data?
12. Retention of data
13. Marketing
14. Transferring data outside the EEA
15. Keeping your data secure
16. Your information rights
17. Cookies
18. Changes to this privacy notice
19. Who to contact if you have a query or complaint regarding the data we hold on you
20. How to contact us

Appendix 1: Government Guidance on Data Protection - May 2018 Data protection

### 1. Who We Are

**Name:** Harwell Science & Innovation Campus

**Registered Address:** Management Office, HQ Building, Thomson Avenue, Harwell Campus, Didcot, Oxon OX11 0GD

**Company Number:** 08796523 HSIC

**VAT Number:** 200902464 HSIC

Under data protection law, we are a 'controller' and as such, we are responsible for managing and processing your personal data.

### 2. What Personal Data We Collect And Store About You

Normally we collect data from you via every day business contact including but not exclusively:

- Business cards you share with our team members
- When you request information from us

- When you respond to invitations e.g. to attend an event
- If you take part in a survey or provide us with feedback
- If you should apply for a role within our organisation (including as an employee, temporary, contract or employed via third parties)
- Incidentally, for example if your name is introduced to us by a third party in an email cc or directly within the content by way of a direct introduction. In this case we will seek your permission for your data to be held by us for future contact
- Occasionally, from lists we may purchase from authorised list provider sources
- We collect anonymous data usage from our website via Google Analytics but cannot identify individual patterns of behaviour or personal profiles from this.
- If you have submitted your CV or job application we would also hold details entered there including qualifications, references, prior employment and any other facts you disclose about yourself.
- Occasionally, dietary or other special needs as stated e.g. wheelchair access

**The contact data we normally hold on you is:**

Mr, Mrs, Ms, Prof, Dr. or Sir/Lady + Honorary titles where applicable

Full name

Job Title

Name of organisation you belong to

Work email address

Business address

Land and/or mobile contact number

**Biographical Data e.g. from CV's or by team members shown on the Harwell Campus website**

This may include personal details + education and work history, academic results and details of personal information or references supplied to us. This may include data regarding criminal convictions.

**Transaction data which may include but not exclusively:**

Details about payments to and from you, billing address details; business information e.g. bank account details, details of products or services we have purchased from you or sold to you.

In the normal course of business we will use your data within the guidelines of the GDPR for lawful data processing (lawful basis).

We will only process your data if it is within the criteria of 'legitimate interest' and we will only use your data for the reasons for which we collected it unless we consider another reason that is also compatible with the original purpose.

More than one basis can apply at one time e.g. if we are contacting you to amend our privacy policy or we may be communicating something to you such as an event you may like to attend.

**3. What We Do With Your Data**

We will contact you from time to time to:

**Harwell**

- i) Invite you to special events, meetings and updates that we consider may be of interest and relevance to you.
- ii) Share information with you that could be of benefit to you.
- iii) We do not share your full data i.e. name and contact email, phone or address with third parties without your permission. However, we may from time to time share your name, job title and company name with members of the Joint Venture at Harwell which includes the Science and Technology Facilities Council e.g. checking you are included on a guest list for a specific event invitation or launch.
- iv) We will contact you on a one to one personal basis via email or phone regarding relevant business matters, meetings or information we feel you should be a party to.
- v) To perform a contract we are about to enter into, or have entered into with you already.
- vi) Where you have undertaken to perform a contract or supplier services to us.
- vii) Where we need to comply with legal or regulatory obligations.

#### **4. Where We Store Your Data And How We Keep It Safe**

Your data may be held on any or all the following systems:

- i) **In Touch CRM** - our proprietary, password protected Customer Relationship Management System – accessed by designated users
- ii) **Harwell Contact Manager** - a database that holds information about contacts specifically belonging to organisations located on Harwell Campus - accessed by designated users
- iii) **Eventbrite** - a password protected proprietary event management system - accessed by designated users and used to capture event registrations
- iv) **Personal desktop and laptop computers** - (password protected) belonging to members of the team – in the address book and on documentation contained there
- v) **On mobile phones** – belonging to the business and any data held on privately owned mobiles belonging to people working for the business
- vi) **Within stored hard copy files or folders** - kept within an environment that is accessed only by individuals holding a security access fob i.e. members of the team
- vii) **Highly sensitive data** - e.g. personal financial records have an additional layer of password protection and are only accessible by specific nominated individuals

#### **5. How Your Data Is Used In Relation To Third Parties**

- i) We do not share your full data i.e. name and contact email, phone or address with third parties without your permission. However, we may from time to time share your name, job title and company name with members of the Joint Venture at Harwell which includes the Science and Technology Facilities Council. They may also hold your data independently of us, with the remit of their own GDPR policy and data protection guidelines.

**Harwell**

## **6. Contractual Necessity**

If you apply for a job with us or you are our customer, we will process your personal data for the following purposes, on the legal basis that we need to:

- i) Identify you
- ii) Respond to your enquiries
- iii) To enable us to necessarily provide pre-contractual information about our services
- iv) To provide you with our services or products
- v) To enable billing and/or administration in relation to you /your business
- vi) Evaluate your job application and the steps necessary to evaluate your suitability for role(s) + any potential future roles if you have asked to be considered for these
- vii) Follow up any references you have provided in relation to your job application

## **7. Legitimate Interests**

We will process your personal data for our legitimate business purposes which may include the following:

- i) In order to conduct and manage our business
- ii) To enable us to provide our services
- iii) To ensure that our website and computer files are safe and secure
- iv) To analyse, improve and update our services for the benefit of our customers, e.g. conducting surveys from time to time
- v) Deal with any complaints or queries arising
- vi) Keep you informed about our services, promotions or events that may be of interest to you, considered as 'marketing and promotion'. You have the right to opt out of marketing information at any time and can contact us to be formally removed from the contact list for these purposes. We will adhere to applicable direct marketing laws for these purposes and will process your data on a legal basis.
- vii) We will ensure your rights and interests are carefully considered when processing your data

## **8. Compliance With Laws**

We may process your data to comply with applicable laws within the UK e.g. law enforcement.

## **9. Consent**

Where possible we will seek explicit 'opt in' consent from you to enable us to contact you. We will also employ 'legitimate interest' where we deem there to be reasons to contact parties who are campus occupiers e.g. when an emergency arises on campus.

**Harwell**

You have the right to withdraw consent to marketing at any time. This will not affect the lawfulness of processing that took place prior to the withdrawal of consent.

We collect consent in the following ways:

- Permission to keep individuals details e.g. a business card which is recorded in the 'In Touch' system
- Opt in consent within the In Touch Database
- Form completion and consent for organizational contacts to be a) loaded into Harwell Contact Manager and b) listed as an organization on the campus website
- Personal consent from individuals via a google form, to consent to being listed within Harwell Contact Manager

## **10. Do We Share Your Personal Data?**

We may provide your personal data to the following recipients for the purposes set out in this notice:

Our service providers, including:

- i) Email and mail service providers
- ii) Technical and support partners, such as the companies who host our websites and who provide technical support and back-up services
- iii) Recruitment service providers
- iv) Merger or acquisition partners, to the extent that sharing your personal data is necessary
- v) Law enforcement agencies, government or public agencies or officials, regulators, and any other person or entity that has the appropriate legal authority where we are legally required or permitted to do so, to respond to claims, or to protect our rights, interests, privacy, property or safety
- vi) Any other parties, where we have your specific consent to do so

## **11. Do You Have To Provide Us With Your Personal Data?**

In order to form a contract with you, we will need some or all the personal data described in Section 2 above so that we can perform the contract or the steps that lead up to it. If we do not receive the data, it will not be possible to perform that contract.

If you sign up to our mailing list, you will have to provide specified personal data. You may choose to stop receiving our mailings at any time.

## **12. What Period Of Time Will Your Personal Data Be Retained For?**

We carefully consider the personal data that we store, and we will not keep your information in a form that identifies you for longer than is necessary for the purposes set out in this notice or as required by applicable law. In some instances, we are required to hold data for minimum periods: for example, UK tax law currently specifies a six-year period for retention of some of your personal data.

## **13. Marketing**

**Harwell**

We may store your contact details, and carry out marketing profiling activities, for direct marketing purposes. If you have given your consent, or if we are otherwise permitted to do so, we may contact you about our services that may be of interest to you. You will be given the opportunity to opt out each time you are contacted. Additionally, you may opt out at any time by contacting us using the details in section 20 below.

#### **14. Do We Transfer Personal Data Outside The EEA?**

We do not transfer data outside of the European Economic Area but if this decision were to change, without notice, we would safeguard your privacy rights. Transfers would be made to recipients to which a European Commission “adequacy decision” applies (this is a decision from the European Commission confirming that adequate safeguards are in place in that location for the protection of personal data), or will be carried out under standard contractual clauses that have been approved by the European Commission as providing appropriate safeguards for international personal data transfers, or by the adoption of EU-US Privacy Shield.

#### **15. How Do We Keep Your Personal Data Secure?**

We have security measures in place designed to prevent data loss, to preserve data integrity, and to regulate access to the data. Only our authorised employees and third parties processing data on our behalf have access to your personal data.

All our employees who have access to your personal data are required to adhere to our Privacy Policy and we have in place contractual safeguards with our third-party data processors to ensure that your personal data is processed only as instructed by us.

We take all reasonable steps to keep your data safe and secure and to ensure that the data is accessed only by those who have a legitimate interest to do so. Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to us. Any transmission over the internet is at your own risk. Once we have received your personal data, we will use strict procedures and security features to try to prevent unauthorised access.

#### **16. Your Information Rights**

We draw your attention to your following rights under data protection law:

- **right to be informed** about the collection and use of your personal data
- **right of access** to your personal data, and the right to request a copy of the information that we hold about you and supplementary details about that information – you will be asked to provide proof of your identify and residential address, and we may ask you to provide further details to assist us in the provision of such information
- **right to have inaccurate personal data that we process about you rectified** – we want to ensure that the personal information that we process

**Harwell**

and retain about you is accurate, so please do remember to tell us about any changes, e.g. if you have moved company or changed your contact details. It is your responsibility to ensure that you submit true, accurate, and complete information to us – and please also update us if this information changes

- **right of erasure** – in certain circumstances you have the right to require us to block, erase or destroy personal data that we process about you
- **right to object to, or restrict:**
  - processing of personal data concerning you for direct marketing
  - decisions being taken by automated means which produce legal effects concerning you or that similarly significantly affect you (however, we do not currently take automated decisions)
  - in certain other situations, our continued processing of your personal data
- **the right of portability** of your data in certain circumstances

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

These rights are subject to certain limitations that exist in law. Further information about your information rights is available on the ICO's website: <https://ico.org.uk/>

## **17. Cookies**

Our website uses cookies. For more information on which cookies we use and how we use them, please see our Cookies Notice.

## **18. Changes To This Privacy Notice**

We may change this notice from time to time. You may request this notice, in order to ensure you are aware of the most recent version and we are also planning to publish the notice on our website.

## **19. What Should You Do If You Have A Complaint?**

We hope that you will be satisfied with the way in which we approach and use your personal data.

Should you find it necessary, you have a right to raise a concern with our supervisory authority, the Information Commissioner's Office: <https://ico.org.uk/>

However, we do hope that if you have a complaint about the way we handle your personal data, you will contact us in the first instance using the contact details in section 20 below, so that we have an opportunity to resolve it.

## **20. If You Need To Contact Us?**

**Harwell**

If you would like to contact us about this notice, including if you wish to receive further information about any aspect of it, our details are as follows:

Fiona Smart – Head of Marketing

**E-mail :** [Connect@Harwellcampus.com](mailto:Connect@Harwellcampus.com)

## **Appendix 1 - Government Guidance on Data Protection - May 2018**

### **1. The Data Protection Act**

The Data Protection Act 2018 controls how your personal information is used by organisations, businesses or the government.

The Data Protection Act 2018 is the UK's implementation of the General Data Protection Regulation (GDPR).

Everyone responsible for using personal data has to follow strict rules called 'data protection principles'. They must make sure the information is:

- used fairly, lawfully and transparently
- used for specified, explicit purposes
- used in a way that is adequate, relevant and limited to only what is necessary
- accurate and, where necessary, kept up to date
- kept for no longer than is necessary
- handled in a way that ensures appropriate security, including protection against unlawful or unauthorised processing, access, loss, destruction or damage

There is stronger legal protection for more sensitive information, such as:

- race
- ethnic background
- political opinions
- religious beliefs
- trade union membership
- genetics
- biometrics (where used for identification)
- health
- sex life or orientation

There are separate safeguards for personal data relating to criminal convictions and offences.

### **Your rights**

Under the Data Protection Act 2018, you have the right to find out what information the government and other organisations store about you. These include the right to:

- be informed about how your data is being used
- access personal data

- have incorrect data updated
- have data erased
- stop or restrict the processing of your data
- data portability (allowing you to get and reuse your data for different services)
- object to how your data is processed in certain circumstances

You also have rights when an organisation is using your personal data for:

- automated decision-making processes (without human involvement)
- profiling, for example to predict your behaviour or interests

## **2. Find out what data an organisation has about you**

Write to an organisation to ask for a copy of the information they hold about you.

If it's a public organisation, write to their Data Protection Officer (DPO). Their details should be on the organisation's privacy notice.

If the organisation has no DPO, or you do not know who to write to, address your letter to the company secretary.

### **How long it should take**

The organisation must give you a copy of the data they hold about you as soon as possible, and within 1 month at most.

In certain circumstances, for example particularly complex or multiple requests, the organisation can take a further 2 months to provide data. In this case, they must tell you:

- within 1 month of your request
- why there's a delay

### **When information can be withheld**

There are some situations when organisations can withhold information, for example if the information is about:

- the prevention, detection or investigation of a crime
- national security or the armed forces
- the assessment or collection of tax
- judicial or ministerial appointments

An organisation does not have to say why they're withholding information.

### **How much it costs**

Requests for information are usually free. However, organisations can charge an administrative cost in some circumstances, for example if:

**Harwell**

- you're asking for a large amount of information
- your request will take a lot of time and effort to process

### 3. Make a complaint

If you think your data has been misused or that the organisation holding it has not kept it secure, you should contact them and tell them.

If you're unhappy with their response or if you need any advice you should contact the Information Commissioner's Office (ICO).

#### ICO

[casework@ico.org.uk](mailto:casework@ico.org.uk)

Telephone: 0303 123 1113

Textphone: 01625 545860

Monday to Friday, 9am to 4:30pm

[Find out about call charges](#)

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

You can also [chat online with an advisor](#).

The ICO can investigate your claim and take action against anyone who's misused personal data.

You can also visit their website for information on [how to make a data protection complaint](#).

**Harwell**