North Devon +Privacy Notice

We take the information we hold very seriously, and we are committed to the privacy and security of it.

Who is collecting and using your personal data?

North Devon+ (ND+) collects and uses the personal data that you provide to us. As such, we will ensure that the data you give us is processed in line with your rights under the Data Protection Act 2018.

Why are we collecting your personal data and who we will share your personal data with?

The processing of your personal data is necessary to enable North Devon+ to provide you with the support requested by you. The legitimate purpose for which we have collected your personal information will vary depending on the reasoning for your interaction with us but will relate to the current role we are carrying out as set out in the table below:

To deliver services to you, it is necessary for us to share your personal data with relevant delivery partners and government departments. Information may be shared with other persons or organisations helping us with the assessment and monitoring of our services and with the delivery of the service. Information you provide may also be shared with other government departments, agencies and third parties appointed in connection with the administration of the service you have applied for. Please see table below for details. We will not share your data with third parties outside of those listed.

If you supply personal information relating to third parties to us, you must ensure that you inform those third parties about how you use this information and inform them that this information will be passed to and processed by us as set out in this notice.

Service Specific Privacy Notices

|  |  |
| --- | --- |
| Role | Why is it collected and held? |
| HR & Payroll | Recruitment  Payroll  We are collecting your personal data for the following purposes:  •Maintaining our own accounts and records.  •To enable the recruitment of staff  The Data Protection Act requires that personal data is collected and processed only where there is a lawful basis to do so. The lawful basis which applies in this instance is as follows:  Legitimate interests |
| Finance | Making payments to suppliers  Processing payments from customers  The Data Protection Act requires that personal data is collected and processed only where there is a lawful basis to do so. The lawful basis which applies in this instance is as follows: Legitimate interests |

|  |  |
| --- | --- |
| Role | Why is it collected and held? |
| LEADER5 | If you have applied for funding under LEADER5, we will use the information you provide to administer, process, and assess your application for funding under the Rural Development Programme for England and to administer any funding if your application is successful. We may publish details about successful applications on our website (this may include all or some of the project and applicant details).  We will also use the information you provide to monitor the outputs you produce as a result of your project. This may include details of new and existing staff, finance payments, and location/existence of assets purchased with the grant funding.  The Data Protection Act requires that personal data is collected and processed only where there is a lawful basis to do so. The lawful basis which applies in this instance is as follows:  Legitimate interests |

|  |  |
| --- | --- |
| Role | Why is it collected and held? |
| UBI RGF | We will use the information you provide to administer, process, and assess your application for funding under the UBI RGF programme and to administer any funding if your application is successful.  We will also use the information you provide to monitor the outputs you produce as a result of your project. This may include details of new and existing staff, finance payments and location/existence of assets purchased with the grant funding.  The Data Protection Act requires that personal data is collected and processed only where there is a lawful basis to do so. The lawful basis which applies in this instance is as follows:  Legitimate interests |

|  |  |
| --- | --- |
| Role | Why is it collected and held? |
| Growth Support Programme | To deliver services to you, it is necessary for us to share your personal data with the Growth Support Programme (managed and run by Devon County Council) and its delivery partners. As the Growth Support Programme is part-funded by the European Regional Development Fund (ERDF), DCC is required to share your personal data with the Ministry of Housing, Communities, and Local Government (MHCLG). Your business advisor will share a copy of MHCLG’s Privacy Policy at your first meeting.  DCC has procured an external organisation, GWE Business West, to manage the marketing for the programme. It is therefore necessary for DCC to share your personal data with specific employees of GWE Business West to enable them to carry out the marketing for the project.  The Growth Support Programme will not share your data with third parties outside of those listed above.  The Data Protection Act requires that personal data is collected and processed only where there is a lawful basis to do so. The lawful basis which applies in this instance is as follows:  Legitimate interests |
| Business BOOST | To deliver services to you, it is necessary for us to collect your personal data. As the Business BOOST Programme is part-funded by North Devon Council and Torridge District Council via the Dept of Business, Energy and Industrial Strategy (BEIS). ND+ may be required to share your personal data with these agencies only for statistical purposes and monitoring.  ND+ will not share your data with third parties outside of those listed above.  The Data Protection Act requires that personal data is collected and processed only where there is a lawful basis to do so. The lawful basis which applies in this instance is as follows:  Legitimate interests |

|  |  |
| --- | --- |
| Role | Why is it collected and held? |
| Start Up and Grow | Data must be supplied and shared for reporting and research purposes for the Ministry of Housing, Communities and Local Government (MHCLG), who manage European funding on behalf of the UK and our Contract Lead Accountable Partner, YTKO. All information will be held in the strictest confidence and your personal details will not be disclosed to any other third parties without your consent.  The Data Protection Act requires that personal data is collected and processed only where there is a lawful basis to do so. The lawful basis which applies in this instance is as follows:  Legitimate interests |
| Heart of the South West Growth Hub | The Growth Support Service is part of the Heart of the South West Growth Hub. It is aimed at established and newly started businesses committed to growth. As a general rule, the Growth Support Service will aim to support businesses and offer advice where such support is not available to a business under an ERDF scheme or through mainstream government support such as DIT. There is a specific focus of the Growth Support Service to support the delivery of LEP priority sectors such as rural productivity including the food economy (agri-food sectors) and agri-tech.  The Data Protection Act requires that personal data is collected and processed only where there is a lawful basis to do so. The lawful basis which applies in this instance is as follows: Legitimate interests |

|  |  |
| --- | --- |
| Role | Why is it collected and held? |
| Bid Writing | The personal information you have provided is required to enable us to write a bid submission for you based on the requirements you have given us. All information will be held in the strictest confidence and your personal details will not be disclosed to any other third parties without your consent.  The Data Protection Act requires that personal data is collected and processed only where there is a lawful basis to do so. The lawful basis which applies in this instance is as follows:  Legitimate interests |
| Visitors to our office | All visitors sign in and out at reception which is managed by the building’s owner (Torridge District Council for both Caddsdown and Riverbank House). Torridge District Council has its own Service Specific Notice covering its use of CCTV.  <https://www.torridge.gov.uk/article/17437/CCTV-Operations> |

|  |  |
| --- | --- |
| Role | Why is it collected and held? |
| Direct Marketing | We keep a Consent database for those who have completed our Keeping in Touch forms to enable us to provide them with details of events, news and information on business support and funding opportunities. The Data Protection Act requires that personal data is collected and processed only where there is a lawful basis to do so. The lawful basis which applies in this instance is as follows:  Consent  We use Companies House data to send out details of events, news and information on business support and funding opportunities. The Data Protection Act requires that personal data is collected and processed only where there is a lawful basis to do so. The lawful basis which applies in this instance is as follows:  Legitimate interests |
| Devon County Council Interim Business Support | To deliver services to you, it is necessary for us to share your personal data with the Interim Business Support Programme (managed and run by Devon County Council) and its delivery partners. As the Growth Support Programme is part-funded by the European Regional Development Fund (ERDF), DCC is required to share your personal data with the Ministry of Housing, Communities, and Local Government (MHCLG). Your business advisor will share a copy of MHCLG’s Privacy Policy at your first meeting.  The Interim Business Support Programme will not share your data with third parties outside of those listed above.  The Data Protection Act requires that personal data is collected and processed only where there is a lawful basis to do so. The lawful basis which applies in this instance is as follows: Consent |
| Role | Why is it collected and held? |
| Torridge District Council Discretionary Grants Scheme | The Privacy Policy for Torridge District Council can be found here.  https://www.torridge.gov.uk/privacypolicy |
| North Devon Pioneer Environmental Land Management (ELM) Scheme Trial | Acting as sub-contractor to BIP (Okehampton) to collect data to populate the farm business finance template. The North Devon Pioneer Environmental Land Management (ELM) trial is part of the Department for Environment, Food & Rural Affairs (Defra) ELM Tests and Trials programme which Defra initiated in 2018 as a mechanism to co-design the ELM scheme with stakeholders and to help refine and improve the policy framework and delivery methods.  The lawful basis which applies in this instance is as follows: Legitimate interests |
| DCC EUT Support Programme | Acting as a sub-contractor to DCC to make businesses aware of what they need to do for EU transition and to improve business resilience following the end of the EU Transition for a period to 31st March 2021.  The lawful basis which applies in this instance is as follows: Legitimate interests |

|  |  |
| --- | --- |
| Role | Why is it collected and held? |
| Torridge District Council (TDC) Councillor Grant Scheme | The Privacy Policy for Torridge District Council can be found here.  https://www.torridge.gov.uk/privacypolicy |
| Torridge District Council (TDC) Additional Restrictions Grant | The Privacy Policy for Torridge District Council can be found here.  https://www.torridge.gov.uk/privacypolicy |
| HOTSW Growth Hub Farming Food Business Resilience Support | Acting as a sub-contractor to BIP (Okehampton) to source and support farming businesses, food and drink businesses that process agricultural and horticultural products and farm diversification enterprises  The lawful basis which applies in this instance is as follows: Legitimate interests |

How long will we hold your personal data?

North Devon + will retain your personal data for only as long as is necessary, and in line with our organisation’s record retention schedules. Following secure deletion of electronic records, they remain on our server for a further four months before the record is purged.

| [Class of Record](https://www.northdevon.gov.uk/council/data-protection-and-freedom-of-information/privacy-and-data-protection/data-retention/data-retention-schedules/?ID=D17&DS=297) | [Retention Period](https://www.northdevon.gov.uk/council/data-protection-and-freedom-of-information/privacy-and-data-protection/data-retention/data-retention-schedules/?ID=A37&DS=297) |
| --- | --- |
| HR Payroll and Finance | See separate document retention schedules held by Torridge District Council and North Devon Council |
| LEADER5 | We will hold the majority of your information for three years after the programme closure (currently expected to be 2023), unless we have a legitimate reason to hold this for longer, for instance in defending any legal proceedings brought by any person or body in relation to your application or any funding we have provided, or as required by law or any relevant code of practice |
| UBI RGF | We will hold the majority of your information for three years after the completion of the programme monitoring (currently expected to be 2027), unless we have a legitimate reason to hold this for longer, for instance in defending any legal proceedings brought by any person or body in relation to your application or any funding we have provided, or as required by law or any relevant code of practice |
| Growth Support Programme | As the Growth Support Programme is part-funded by the European Regional Development Fund (ERDF), we are required to retain all programme documents (including your personal data) until MHCLG announces the destruction date, this is currently expected to be 31st December 2033 |
| Start Up and Grow | As the Start Up and Grow Programme is part-funded by the European Regional Development Fund (ERDF), we are required to retain all programme documents (including your personal data) until MHCLG announces the destruction date, this is currently expected to be 31st December 2033 |

|  |  |
| --- | --- |
| [Class of Record](https://www.northdevon.gov.uk/council/data-protection-and-freedom-of-information/privacy-and-data-protection/data-retention/data-retention-schedules/?ID=D17&DS=297) | [Retention Period](https://www.northdevon.gov.uk/council/data-protection-and-freedom-of-information/privacy-and-data-protection/data-retention/data-retention-schedules/?ID=A37&DS=297) |
| Heart of the South West Growth Hub | Until MHCLG announces destruction date, currently expected to be 31/12/33 |
| Bid Writing | Unsuccessful - 1 year from rejection  Successful - 6 years from the end of the contract period |
| Visitors to our office | See separate document retention schedule held by Torridge District Council |
| Direct Marketing | Individual entries reviewed every 2 years and contact asked to confirm if they wish to register to stay on it.  Companies House data updated once a month |
| DCC Interim Business Support | As the Interim Business Support Programme is part-funded by the European Regional Development Fund (ERDF), we are required to retain all programme documents (including your personal data) until MHCLG announces the destruction date, this is currently expected to be 31st December 2033 |

|  |  |
| --- | --- |
| [Class of Record](https://www.northdevon.gov.uk/council/data-protection-and-freedom-of-information/privacy-and-data-protection/data-retention/data-retention-schedules/?ID=D17&DS=297) | [Retention Period](https://www.northdevon.gov.uk/council/data-protection-and-freedom-of-information/privacy-and-data-protection/data-retention/data-retention-schedules/?ID=A37&DS=297) |
| TDC Discretionary Grants Scheme | Until TDC announces destruction date |
| North Devon Pioneer Environmental Land Management (ELM) Scheme Trial | As a sub-contractor to BIP we act as data processor and so are responsible for complying with the General Data Protection Regulations when processing personal data. At the end of the contract period all physical records are handed over to BIP and electronic records, once transferred to BIP, are deleted. |
| DCC EUT Support Programme | Until DCC announces destruction date |
| TDC Councillor Grants Scheme | Until TDC announces destruction date |
| TDC Additional Restrictions Grant (ARG) | Until TDC announces destruction date |
| HOTSW Growth Hub Farming Food Business Resilience Support | As a sub-contractor to BIP we act as data processor and so are responsible for complying with the General Data Protection Regulations when processing personal data. At the end of the contract period all physical records are handed over to BIP and electronic records, once transferred to BIP, are deleted. |

|  |
| --- |
| Network PSN  We are covered under Network (PSN)  Please see the link here: <https://www.gov.uk/guidance/public-services-network-psn-compliance>  The PSN uses a ‘walled garden’ approach, which enables access to Internet content and shared services to be controlled. This is because the security of any one user connected to the PSN affects both the security of all other users and the network itself. The PSN compliance process exists to provide the PSN community with:  confidence the services they use over the network will work without problems,  assurance that their data is protected in accordance with suppliers’ commitments,  the promise that if things do go wrong, they can be quickly put right. |
|
|
|

Exercising your rights

Under the Data Protection Act 2018 you have the following rights.

• The right of access to your own personal data

• The right to request rectification or deletion of your personal data

• The right to object to the processing of your personal data

• The right to request a copy of the information you provide us in machine readable format

• The right to withdraw your consent to any processing that is solely reliant upon your consent

Should you wish to exercise any of your rights, you should contact the Data Protection Officer (dataprotection@northdevonplus.co.uk)

How we use cookies

A cookie is a small file which asks permission to be placed on your computer's hard drive. Once you agree, the file is added, and the cookie helps analyse web traffic or lets you know when you visit a particular site. Cookies allow web applications to respond to you as an individual.  The cookies that we use do not record any personal information whatsoever - they only tell us your computer's IP address and where you are in the country.

Your right to complain

If you wish to complain about the way that your personal data has been handled by North Devon +, you should write to the Data Protection Officer and clearly outline your case. (dataprotection@northdevonplus.co.uk)

You 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.

See www.ico.org.ukInformation Commissioner’s Office Wycliffe House Water Lane Wilmslow Cheshire SK9 5AF Email: casework@ico.org.uk