



NCG Business to Business Privacy Notice

1. Overview

We ask that you read this privacy notice carefully as it contains important information on who we are, how and why we collect, store, use and share your personal information, your rights in relation to your personal information and how to contact us and the Information Commissioners Office in the event you have a complaint. NCG shall process your personal data in accordance with the UK General Data Protection Regulations (UK GDPR) and the Data Protection Act 2018.

NCG comprises the following colleges and our Professional Services team:

- Carlisle College
- Kidderminster College
- Lewisham College
- Newcastle College
- Newcastle Sixth Form College
- Southwark College
- West Lancashire College

Our main establishment is based at:

NCG
Rye Hill House
Scotswood Road
Newcastle Upon Tyne
NE4 7SA

We are registered as a data controller with the ICO under the registration number Z6977454.

2. Types of personal data

We process the following personal data about representatives from businesses and sole traders with whom we have a prospective, established or previous relationship:

- Contact details – including name, email address, business telephone numbers and business address
- Images, audio and video recordings – including recording virtual meetings or CCTV footage
- Financial information – including bank details, what we pay you / you pay us
- Employment details



3. Special category data and criminal convictions

Some of your data is considered to be special category personal data under the UK GDPR. Examples of special category data include information that reveals the following:

- Racial or ethnic origin
- Political opinions
- Religious or philosophical beliefs
- Trade union membership
- Sexual orientation
- Sex life
- Health data
- Genetic data
- Biometric data

NCG will only process special category data and data that reveals information about criminal convictions where you have provided consent, or where there is a lawful reason to do so for example under the Equality Act 2010. The NCG Special Category Data Policy is available upon request and this explains our obligations to process these types of data.

4. How we obtain personal data

We obtain personal data about you from the following sources:

- Direct from you via business cards
- From email, telephone or web enquiries
- From your attendance at events hosted by or attended by NCG
- Direct from you through paperwork that you complete at the start of a contractual relationship with NCG
- Through bids and tenders
- Referrals from an external organisation, one of your colleagues or contacts

5. Why we process personal data

Our business partnerships support investment in skills, innovation, enterprise, entrepreneurship and economic growth, as well as improving the employment opportunities available to students and learners. We store data so we can monitor our relationships with external organisations to ensure a useful and accurate response is delivered in a timely manner. Without this data, we're not able to manage our relationship or correspond with you regarding opportunities that may be of interest to you.

Data protection legislation requires NCG to have a lawful basis to process your personal data and the lawful bases that we rely on for the following activities include Consent, Contract and Legitimate Interest:



- Registration and administration of business relationships
- Management of enquiries
- Administration of business activities e.g. registration and invitation to events.
- Pursuit of social activities e.g. inviting partners to corporate events.
- Management of projects and contracts including commissioned and collaborative projects, apprenticeship provision, educational courses, rental of learning facilities and consultancy
- Processing and recovery of accounts and payments.
- Building strategic partnerships and relationships, making connections between parties and communities interested in advancing or investigating areas of mutual interest.

Where we do not have a contractual relationship or recorded consent from you, our processing of your business contact details is based on our legitimate interests in developing and maintaining a business to business relationship with you. Your objection to us processing these details shall nullify our legitimate interests.

6. When we will share personal data

We may share your information with third parties who provide elements of services to us, or directly to you on our behalf. These organisations are known as data processors. We have contracts in place with our data processors that mean they should not do anything with your personal data unless we have instructed them to do it. They will not share your personal data with any organisation apart from us without our consent and they will ensure it is stored securely for the period that we instruct.

We may share your information with students from NCG where our relationship with you requires this.

At no time will your personal data be sold to other organisations for marketing or sales purposes.

NCG may be obliged to provide information to the police, local authorities or relevant government departments if it is deemed necessary under the appropriate exemption/derogation for the prevention or detection of crime.

7. Transfer of data outside of the European Economic Area (EEA)

NCG do not routinely transfer your personal data outside of the EEA. However, on rare occasions, some organisations that process data on our behalf may store data in cloud services outside of the EEA. These transfers will only be made to services hosted in countries with which there are appropriate safeguards.



8. How long we retain your personal data

You can find our personal data retention schedule at the following link:
<https://www.ncgrp.co.uk/wp-content/uploads/2017/03/Document-Retention-Schedule.pdf>

9. Your rights

a. Access to information

At any point you can contact us to request details concerning the information we hold about you, why we have that information, who has access to the information and where we got the information. In most cases you may be entitled to copies of the information we hold concerning you. Once we have received your request, we will respond within one month unless we need to extend that period owing to the complexity of your request.

b. Rectifying data

If the data we hold about you is out of date, incomplete or incorrect, you can inform us, and we will ensure that it is updated.

c. Erasing data

If you feel that we should no longer be using your data or that we are illegally using your data, you can request that we erase the data we hold. When we receive your request, we will confirm whether the data has been deleted or tell you the reason why it cannot be deleted.

d. Restricting processing

In certain circumstances, you have the right to request that NCG stops processing your data. Upon receiving the request, we will contact you to tell you if we are able to comply or if we have legitimate grounds to continue. If the data is no longer processed, we may continue to hold your data to comply with your other rights.

e. Data portability

You have the right to request that we transfer your data to another organisation or to receive a copy of your data in a common format. Once we have received your request, we will comply where it is feasible to do so.

f. Object to direct marketing

All communication with you, including in relation to updates to this privacy notice, will be made via the preferred method of communication that you have registered with us and you will be able to select the type of correspondence you receive. If, at any stage, you are concerned about the content (e.g. unwanted marketing), frequency or method of these communications, you can unsubscribe or notify us of your decision at any time.

g. The right to object to automated decision making / profiling



You have the right not to be subject to automated decision making (making a decision solely based on automated means without any human involvement) and profiling (automated processing of personal data to evaluate certain things about the individual). Where this is the case you should inform us of this wish. NCG do not currently carry out any automated decision making.

h. Withdrawing consent

In instances where we need your consent to process your information, we will ask you to make a positive indication e.g. to tick a box or insert your contact details on the relevant form or web page. By actively providing us with your consent, you are stating that you have been informed of the type of personal information that will be processed, the reasons for such processing, how it will be used, for how long it will be kept, who else will have access to it and what your rights are as a data subject and that you have read and understood this privacy policy. Where processing is based on consent, you have the right to withdraw consent at any time, and you can request this by speaking to a member of staff or contacting our Data Protection Officer at the contact details below.

10. Data Protection Officer

If you would like to exercise any of the rights above, have any questions which you feel have not been covered by this Privacy Notice, or if you have concerns or a complaint in relation to NCG processing your personal data, please do not hesitate to contact us at:

dpo@ncgrp.co.uk

or in writing to:

Data Protection Officer (NCG)
Rye Hill House
Scotswood Road
Newcastle Upon Tyne
NE4 7SA

11. Complaints to the Information Commissioners Office

Should you be dissatisfied with NCG's processing of your personal data and you have not been satisfied by NCG's actions and / or response to your complaint, you have the right to complain to the Information Commissioner's Office. For more information, please see the Information Commissioner's web site: <https://ico.org.uk/>

Copies of this privacy notice in alternative formats are available upon request.