

## **NCG Privacy Statement – Business to Business**

### **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 information in relation to business partnerships where personal data is stored within NCG's Client Relationship Management (CRM) Software. It also contains information about your rights in relation to your personal information and how to contact us and the Information Commissioner's Office in the event you have a complaint. From 25 May 2018, NCG shall process your personal data in accordance with the General Data Protection Regulations (GDPR) and the Data Protection Act 2018.

NCG are made up of the following colleges and training providers:

- Newcastle College
- West Lancashire College
- Kidderminster College
- Carlisle College
- Lewisham and Southwark College
- Newcastle Sixth Form College
- Intraining
- Rathbone

Our main establishment is based at:

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

### **2. Types of personal data we process**

We obtain personal data about you from the following sources:

Direct from you via Business Cards, emails, telephone or web enquiries, submission of an online form, event attendance, enquiries, working with NCG contractual relationship, new supplier form, quotes and tenders etc. or from contract documentation completed and signed by yourselves and direct debit forms. Also from third party sources, where we will always try to ensure that the third party has lawful authority to provide us with the data, for example referral from an external organisation, one of your colleagues or contacts.

Categories of personal data include:

- names, addresses, telephone numbers, e-mail addresses and other contact details;
- images, audio and video recordings;
- financial information;
- employment details.

### **3. Special category of personal data (formerly known as sensitive personal data)**

Limited amounts of special category of personal data may be held by our CRM if it is a requirement due to the nature of the business and/or the relationship between the business

and NCG. In cases involving processing of special category of personal data NCG will gain explicit consent from the data subject.

#### **4. Why we hold and process personal data**

The first data protection principle requires that NCG must have a legal basis for processing your personal data. Under GDPR, these “legal basis” for processing conditions must be communicated to you, alongside the type of processing they relate to, as part of this privacy notice. As GDPR is a new law, the conditions identified below may be subject to change as more guidance is given or precedents are set.

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.

NCG will process your data under the following legal basis:

<b>Activity</b>	<b>Legal Basis Under Article 6</b>
Registration and administration of business relationships.	1(a), (1)(b) and/or (1)(f)
Management of enquiries	1(a), (1)(b) and/or (1)(f)
Administration of business activities e.g. registration and invitation to events.	1(a), (1)(b) and/or (1)(f)
Pursuit of social activities e.g. inviting partners to corporate events.	1(a), (1)(b) and/or (1)(f)
Management of projects and contracts including commissioned and collaborative projects, apprenticeship provision, educational courses, rental of learning facilities and consultancy.	(1)(b) and/or (1)(f)
Processing and recovery of accounts and payments.	1(a), (1)(b) and/or (1)(f)
Building strategic partnerships and relationships, making connections between parties and communities interested in advancing or investigating areas of mutual interest.	1(a), (1)(b) and/or (1)(f)

## **5. How personal data is stored by NCG**

Personal data of our contacts within external organisations is stored in NCG's CRM systems and shared drives located on NCG servers. Access to personal data is restricted to those members of staff who have a requirement to maintain a relationship with you, and is controlled through user security profiles. All NCG employees, contractors and volunteers that are given access to personal data receive mandatory Data Protection training and have a contractual responsibility to maintain confidentiality.

## **6. When we will share personal data**

We do not share any CRM data with 3rd parties, however on occasion 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 out of the European Economic Area (EEA)**

NCG do not transfer your personal data outside of the EEA.

## **8. How long we retain your personal data**

A retention schedule of personal data can be viewed at Appendix A

## **9. Your rights**

- **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 30 days.
- **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.
- **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.
- **Restricting processing**  
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 data is no longer processed, we may continue to hold your data to comply with your other rights.
- **Data portability**  
You have the right to request that we transfer your data to another organisation. Once we have received your request, we will comply where it is feasible to do so.
- **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 (too many) or method (change preference) of these communications, you can unsubscribe or notify us of your decision at any time.

- **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).
- **Withdrawing consent**  
In those cases, 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 requiring consent). By actively providing us with your consent, you are stating that you have been informed as to 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.

#### **10. Lodging a complaint with the Information Commissioners Office**

Should you be dissatisfied with NCG's processing of your personal data, 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/>

#### **11. Data Protection Officer**

If you 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 email us at [dpo@ncgrp.co.uk](mailto:dpo@ncgrp.co.uk)

This privacy notice was last updated on 19<sup>th</sup> December 2018

## **Appendix A – Retention Schedule**

In compliance with NCG's retention schedule will maintain a record for:

Record Series	Description	Maximum Period
Enquiry Data	Expressions of interest in working with NCG	Last contact + 3 years
Application data	Proposal Development	Last contact + 3 years  6 years after contract ends (successful applicants)
Financial Data	Financial data including from supplier transactions	A minimum of 6 years
Commissioned Contract Data	Contract Data including contract output data, KPI's, contract reports, financial transactions.  This is for an evidence trail of expenditure and outcomes for the commissioners of the works or service.	Variable depending on contract length and commissioners/funders storage requirements after the contract expiry.