

SEM Growth Hub and Careers Hub Privacy Notice

1. Council contact details

1.1. West Northamptonshire Council

Registered Office:

One Angel Square

Angel Street

Northampton, NN1 1ED

Contact centre telephone: [0300 126 7000](tel:03001267000)

The Data Controller is West Northamptonshire Council.

The Data Protection team can be contacted by email at

dataprotection@westnorthants.gov.uk

2. Information that we hold

2.1. What personal information do we collect to deliver this service?

This privacy notice sets out the information for the Council's SEM Growth hub and Careers Hub Service which covers:

- People who contact the Growth Hub
- People who contact through the Careers Hub
- People who we work with to deliver projects, programmes and for business engagement.
- People who subscribe to our newsletters
- People who visit our websites
- People who interact with us on social media
- People who respond to our surveys and online feedback
- People who sign-up to our events, webinars, and meetings
- People from the media or enquire about our funding, decision making and governance.
- People who we engage through the Resilience Innovation Grant and Growing Innovation Grant
- People who engage with us as Enterprise Advisors
- People who we have engaged through the ESIF, ESF, ERDF programmes.
- People who we engage through the Community Grants Project.

Depending on the project and programme, the team may collect and process the following personal data:

- Your name (including forename and surname)
- Your business address (including postcode)
- Your telephone number(s)

- Your email address
- Payment details (card numbers etc.) which are held securely and encrypted in the Council's Financial systems.
- Further personal details such as gender and age (including date of birth)
- Unique Identifier (i.e. NI number or similar)
- Imagery (photographs & video footage)

Where applicable we will also collect and process Special Category Data relating to:

- Gender
- Racial or ethnic origin
- Health, disability & behavioural data
- For individuals who would like to sign-up to participate in our Enterprise Adviser Network, we will also require information about criminal convictions or offences in order to send to the Disclosure and Barring Service (DBS). We process this information on behalf of the Careers and Enterprise Company, who are the controller with regards to the processing of this information.
 - Commission or alleged commission of an offence.
 - Proceedings for any offence committed or alleged.
 - Any other criminal data

3. How the information is obtained

3.1. How do we collect this personal information?

Most of the personal information we process is provided to us directly by you in the following ways:

- Face to Face
- Reports
- Application form
- Webchat
- Email
- Telephone
- Email or in writing.

3.2. There are a number of reasons why we need to collect and use your personal information.

Much of what we do in the Growth Hub and Careers Hub is governed by legislation, set nationally, which requires us to provide various services in the South East Midlands region. We process personal data to deliver public tasks outlined in the follow pieces of legislation:

- Articles 6 (1) (f) Legitimate Interest in supplying you with business support in order to grow your business.
- Depending on the services we provide you, we may also be required to collect and process information on behalf of our funding bodies. These are government departments, including the **Department for Business and Trade (DBT)** and for projects part-funded by ERDF, these are **Department of Levelling Up Housing and Communities, Careers and Enterprise Company** on behalf of **Department for Education** and the **European Commission**. For the purposes of data protection, these government departments are the data controllers. The lawful basis under which we are processing your data in these instances is under Articles 6 (1) (e) public task, we will also collect sensitive information which will use special condition Article 9 (2) (g) public task.

The information we collect, and store is also used to provide an auditable record of service delivery and enables us to contact people initiating reports/issues to request further information or provide updates.

Whenever we collect information, we always limit this to only the details that might be needed and we ensure that it is used, and stored, safely and securely. We require anyone we share information with, or who uses it on our behalf, to do so too. All West Northamptonshire Council staff have received training on data protection and information security.

4. What we do with the information

4.1 How do we use this personal information?

We will use your information for communication purposes so that we can provide business services to you. This will include processing information about the type and intensity of business support we provide and the nature of your business support enquiry. It may also include matching your business data to other data sources to understand more about companies like yours and general business patterns and trends. Your data will not be published in or referred to in any way which identifies an individual or business. We will also use your information for independent project monitoring and evaluation and, for our corporate governance purposes.

To meet our funding obligations, West Northamptonshire Council is required to use your data to provide certain business and statistical information about the service we provide to you, to our funding bodies. This may include providing your name and contact details, as well as details about any grant funding provided.

If you have enrolled on the Growth Hub project, part-funded by the European Regional Development Fund (ERDF), your details will be used to support your participation in the

project and for project monitoring and evaluation. See below for further information about data processing for ERDF.

From time-to-time, we may also send you business-related resources, news and events that are relevant to services we provide you. If you do not want to receive marketing-communications from us, you can let us know at any time by speaking to a member of the team at or by contacting a member of the team on mydata@semlep.com.

4.2. Who do we share your information with?

Your data will be shared with our funding providers as listed above.

We may also need to share your information with our sub-contractors who provide services on our behalf and with other contracted third parties for the purposes of independent evaluation. When we do this, we will make sure that they keep your data secure and in line with our data-sharing agreements.

We may also share your information with collaborative partners depending on the project or programme to enable the service to be delivered.

The Growth Hub website is using Tawk.to, a chat platform that connects users with the customer support of the SEM Growth Hub. We are collecting email addresses/names/names of businesses/postcodes only with the consent of the users, in order to start the chat. The messages and data exchanged are stored within the Tawk.to application. For more information, please refer to their [Privacy Policy](#).

West Northamptonshire Council is not making use of these messages or data other than to follow up on users' registered issues or inquiries. Your personal data will be processed and transmitted in accordance with the General Data Protection Regulation (GDPR).

We will not share your data with any other organisation without your prior authorisation to do so.

We will use your data only for the length of time required to deliver the service to you and to meet our funding obligations. This is five years after the end of the funding programme. For businesses enrolled on our Velocity ERDF project, your data will be retained until December 2033. See [Article 140\(1\) of Regulation \(EU\) No 1303/2013](#).

When we publish information in public, we will follow procedures that we have in place to remove personal data associated with the record wherever possible.

We will share personal information with law enforcement or other authorities, only if required by applicable law and in accordance with UK GDPR and the Data Protection Act 2018.

We do not use automated decision making for this processing. Automated decision-making is where decisions are made about you without any human influence on the outcome. These may affect your legal rights or have an impact on your circumstances, behaviour, or choices.

There is no profiling undertaken in relation to this processing. Profiling is where you analyse parts of an individual's personality, behaviour, interests, and habits to identify their preferences, make predictions or decisions about them.

4.3 for Businesses Enrolled in an EU funded programme

The EU Common Provisions Regulations (CPR) and Article 6 of the European Regional Development Fund (ERDF) regulation require the Department for Levelling Up, Housing and Communities (DLUHC) to monitor and evaluate ERDF-funded activities. In order to conduct monitoring and evaluation, individual participant data is required.

The Department for Levelling Up, Housing and Communities (DLUHC) is the data controller in respect of information processed for your participation in the ERDF project. West Northamptonshire Council is the data processor, acting on their behalf.

The information you give us will be used to provide you with the services agreed, and to report to the European Regional Development Fund Managing Authority for monitoring and evaluation purposes.

DLUHC will need to share all or some of your data with the national evaluator of the ERDF programme.

In some cases, the national evaluator, i.e. independent external contractors commissioned by DLUHC, may use the contact details to contact a sample of direct or indirect beneficiaries for the purpose of the National Evaluation of the programme. It is likely that the survey methodology will need to incorporate a variety of approaches in order to maximise the survey response rate (for example, telephone survey, written survey, and e-mail survey) – hence the need for a variety of contact details required for each participant.

DLUHC may also need to share with other government departments and the European Commission where this is necessary to test the robustness of the data gathered or to inform the National Evaluation. DLUHC will not give any personal data to any other

organisation unless needed for the purpose of the evaluation and will instruct them not to use it to contact individuals for any reasons not connected to the purpose of the National Evaluation of the ERDF programme 2014-2020 or other matters directly relating to the evaluation. If DLUHC has to pass on the data, it will only provide what is needed, and if possible, will remove the details that might identify individuals personally.

DLUHC will not keep your personal data for longer than it needs but as a minimum, will retain data for two years after the closure of the 2014-2020 ERDF programme.

For any information on the above, you can contact DLUHC's Data Protection Officer at dclgkia@icasework.fcos.gsi.gov.uk or by telephone 030 3444 0000.

4.4 Community Grants Programme

The Department for Work and Pensions (DWP) is the national Managing Authority for the European Social Fund in England. The Department for Work and Pensions (DWP) is the national Managing Authority for the European Social Fund in England. The Department for Levelling Up, Housing and Communities are the Managing Authority for European Regional Development Fund. They are the controllers for all personal data required to help deliver the European funding programme under the terms of the Funding Agreement.

The Managing Authorities will be processing personal data, necessary for performing a task that is in the public interest or official function, and for the purposes of programme monitoring and evaluation only.

For more information about how the DWP processes data can be found here: www.gov.uk/dwp/personal-information-charter.

The Community Grants Programme is co-funded by the European Social Fund (ESF) and the Education and Skills Funding Agency (ESFA) which is an executive agency for the Department of Education (DfE). For the purpose of data protection, the Department for Education (DfE) is the Data Controller and West Northamptonshire Council will use your personal information in order to carry out the Programme on behalf of the DfE.

Your personal information will be shared with the DfE, programme co-funders and may also be shared with partners who are working with West Northamptonshire Council to deliver the Programme. The DfE may also share your information as necessary to enable them to carry out their functions.

The DfE will not keep your personal data for longer than it needs but as a minimum, will retain data for until 30 December 2030.

You can contact the Data Controller at: Data Protection Officer, Ministerial and Public Communications Division, Department for Education, Piccadilly Gate, Store Street, Manchester, M1 2WD.

To read the full privacy notice for the Community Grants Programme, please see the Privacy Notice [here](#).

4.5 Resilience Innovation Grant and Growing Innovation Grant

The information you give us will be used to provide you with the services agreed to deliver the grant funding.

West Northamptonshire Council may need to share all or some of your data with sub-contractors to support delivery of the project and also West Northamptonshire Council's Accountable Body for compliance purposes.

We may request sensitive category data, and this may include ethnicity and disability, this be used for the purposes of monitoring our performance in equality, diversity, and inclusion.

West Northamptonshire Council will not keep your personal data for longer than it needs but as a minimum, will retain data for three and a half years after the closure of the Resilience Innovation Grant and Growing Innovation Grant schemes.

4.6 Careers Hub Enterprise Advisers

West Northamptonshire Council is contracted by the Careers and Enterprise Company to co-ordinate Enterprise Advisers working with schools. This means we will share your data with the Careers & Enterprise Company and their associated partners, for full details of how they handle your data, please see their [privacy policy](#).

- We will also use your data to send you a newsletter.
- Communicate with you.
- Facilitate the DBS checks required to work in schools.
- Share your information with selected schools.

4.7 People who subscribe to our E-Newsletters

We use Campaign Monitor to deliver our monthly e-newsletters and occasional e-blasts. If you subscribe to our newsletters, you give us your consent to use the information you provide us for this purpose. The SEM Growth Hub and Careers Hub will not use your data

for any other purpose, and **you can unsubscribe at any time by clicking on the unsubscribe link at the bottom of the newsletter.**

When you receive our newsletter, we record information about email opening and clicks in order to improve the information we provide. Your personal data retained will not be shared with any other organisation.

Campaign Monitor is a third-party provider based outside of the European Economic Area, in Australia. When you sign-up to our newsletter, your data will be transferred to Campaign Monitor and processed in accordance with their [privacy policy and terms](#) and is covered by a Data Processing Addendum. Campaign Monitor has obligations and responsibilities to comply with EU data regulations. You can read about the measures they are taking to comply with GDPR [here](#).

4.8 Visitors to the Growth Hub and Careers Hub website

When someone visits www.semlep.com or www.semlepgrowthhub.com we use Google Analytics, to collect standard internet log information and details of visitor behaviour patterns.

We do this to find out things such as the number of visitors to the various parts of the site. This does not collect information from which you can personally identify anyone.

4.9 People who interact with us on social media

If you like or follow any of our social media accounts, we will collect information about this. We use this information for legitimate business purposes only. We monitor the data to understand how people use information we publish on social media and occasionally to provide you with more personalised information about The Growth Hub and Careers Hub services through social boosts and advertising. You can change your settings within your social media accounts to set how organisations can target social posts to you, through them.

4.10 People who attend events, webinars and meetings

We often host public events to keep people informed of the work and investments we make and to provide business support and networking opportunities. When you sign-up for an event, we record and retain personal data and use this for our legitimate business purposes. This includes:

- helping us to host an effective event.
- sending you information related to the event or which we think you may be interested in afterwards.
- We may also send you invitations to other events or workshops related to the Growth Hub's and Careers Hub's work.

In some instances we must also use the data you provide us when you attend our events to meet our legal obligations set out in our funding agreements.

Some events may be held in partnership with the local Growth Hub Cluster including West Northamptonshire Council, OXLEP, CPCA GH and BBF. Businesses joining events held by the partnership may be from another geographical region and the data collected to attend the event may be shared with the local Growth Hub. This data may include name, phone number, email address. It may also include sensitive data for EED&I reporting purposes but shall be anonymized before data sharing.

To sign-up to our events, we use a third-party provider, Eventbrite, which is covered by a Data Processing Addendum. For further information about how they process data read their [privacy policy](#).

The personal information you provide us via Eventbrite will also be retained securely on our internal database. Your data will not be shared with any other organisation unless we explicitly inform you before you sign-up to the event and you provide your consent for us to do so.

5. How long we keep your information for and how we securely dispose of it after use

5.1 We only keep information for as long as it is needed in line with the council's retention schedule. This will differ according to what information we hold and its purpose. It will be based on either a legal requirement (where a law says we have to keep information for a specific period of time) or accepted business practice.

5.2 EU funded projects require a retention period until Dec 2033.

5.3 We will securely dispose of your information in line with the Council's [Retention Schedules](#).

6. How we store your information

6.1 We take all reasonable and appropriate steps to protect your personal information from unauthorised access, loss, misuse, alteration, or corruption. We have in place procedures and electronic and physical security measures to safeguard the information you provide to us.

6.2 All electronic data stored by West Northamptonshire Council is secure and is backed up regularly, retained in the UK or where organisations are outside of the UK we have implemented Standard Contractual Clauses in Data Processing Agreements. For some

of our funded projects, we are required to retain hard copies of information. These are stored securely in the UK and are only accessible by authorised people.

7. Your data protection rights

7.1. The law gives you a number of rights to control what personal information is used by us and how we can use it. Please see section 15 of the council's [Privacy Policy](#) for further information.

7.2. Please be aware that your rights may differ depending on the lawful basis for processing your personal data.

8. Who to contact

8.1. If you would like further information about how we use your personal information, or you wish to exercise one of your data rights or you wish to complain about the use of your personal information please [contact the Data Protection Officer](#).

8.2. If you are still dissatisfied with how we have used your data once you have made a complaint through the council's internal complaints procedure you have the right to complain to the ICO.

The ICO's address:

Information Commissioner's Office

Wycliffe House

Water Lane

Wilmslow

Cheshire, SK9 5AF

Helpline number: 0303 123 1113

9 Changes to this privacy notice

9.1 Privacy notices are live documents and will be updated or revised periodically in line with service changes and / or new legislation requirements.