



Apprenticeships New Anglia Project Privacy Policy- External

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Review responsibility: Project Manager
Signature:
Paul M Wright

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This policy / procedure may be revised at an earlier date if necessary.

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Introduction

This policy provides guidance to all customers, partners and staff of the Apprenticeships New Anglia project in relation to the processing of personal data under the General Data Protection Regulations brought in to force 25th May 2018. The project is regulated by the GDPR which are monitored and audited by the Information Commissioners Office.

This policy briefly describes what we do with the personal data we process and how we protect data subjects information.

'Personal Data' means any information from which a person can be identified; it includes things like name, e-mail address, home address and telephone number. "Data Subject" means any individual about whom we store data.

The project is committed to protecting the privacy of all data subjects. We will endeavour to ensure that all information provided to us and held by MNL or its partners is kept private and confidential and will only be used to provide the services requested by an individual as a matter of legitimate interest under the appropriate legal basis for processing the data. Our **primary** legal bases are **Consent or Contract** which means;

- We have a contract with the individual and need to process their personal data to comply with our obligations under that contract or we have been asked to do something by them and we need to process their personal data to do what they ask
- We need to contact them with relevant information and require their consent to do so

A full description of all the lawful bases upon which we may do business is described in our **Privacy Statement**, which can be found on our website or accessed by contacting the Data Protection Manager.

Madeline Buxton : madeline@moorenetworking.net 01603 737739

Uses of Personal Information

MNL and its partners will only share details of data subjects within across the project (relevant employees, partners and appointed representatives) or where necessary, with third parties such as host employers and organisations who supply training or refer service users to us.

Where MNL reasonably believes that it is required by law to disclose any personal information held by the organisation to a third party, whether in compliance with any applicable law or regulation the organisation may do so by court order or in connection with legal proceedings,

Participants and employers are required to inform us of any changes to personal information so that the organisation can keep records up to date.

Security

The Business will take the necessary steps to protect personal data and will only store and transfer information securely in line with GDPR requirements. This includes electronic and hard copy data which may be held centrally or remotely and may be accessed by our employees, partners or representatives in venues other than our normal business premises.

GENERAL

All personal data stored as part of the project must be regularly reviewed to ensure it is

- a) adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed;
- b) accurate and, where necessary, kept up to date.
- c) kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data is processed
- d) processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures

Any data subject has the right to find out what data the project holds about the user and have it amended or removed if applicable.

Any service user that wishes to request further information about this privacy policy should contact the Data Protection Manager by emailing

madeline@moorenetworking.net or telephone the office on 01603 737739.

MNL and its partners could need to make changes to how data is processed at any time. However, the project will not change the way it uses personal information without telling the user in advance with an opportunity to opt out of, or prevent the new use of, personal information.

Full details of how The project manages data and your rights as a Data Subject can be found in our **Privacy Statement** which can be found on the website or requested from the Data Protection Manager.

END