

USW SURVEY PRIVACY NOTICE

1. What is the purpose of this document?

EFL Trust are committed to protecting the privacy and security of your personal information. This privacy notice describes how EFL Trust process personal information about you, in accordance with data protection legislation. EFL Trust are a data controller. This means that we are responsible for making decisions about the personal data that we process. Personal data is any information relating to an identified or identifiable living person. When collecting and using personal data, our policy is to be transparent about why and how we process personal data.

This notice applies to USW survey respondents.

2. Why do we want to obtain data?

EFL Trust are interested in gaining feedback from female students on their experience on the USW Foundation Degree programme. We want to use this feedback to explore possible improvements or additional opportunities that can be put in place for future female students.

We would also like to invite willing participants to a focus group covering the same topic.

3. Where do we obtain your personal data from?

The information we process about you is retrieved from:

- You

4. What kind of information do we hold about you, and why?

Information that enables us to consider any improvements to the programme:

- Response to survey questions covering your experience of the programme and your suggested improvements

Information that enables us to invite you to a follow-up focus group:

- E-mail address

5. How will this information be processed lawfully?

We will only process personal information when the law allows us to. We will process your information where:

- Article 6(1)(f) Where it is necessary for our legitimate interests, your legitimate interests, or those of a third party, and your interests and fundamental rights do not override those interests;

The legitimate interest identified is to improve the programme for current and future Participants.

We will only use personal information for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If we need to use your personal information for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal information without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

6. Is my personal information shared with other organisations?

We will not share individual responses with any other data controller.

We share your data with third parties who act as data processors on our behalf. Where we employ a data processor, a contract that meets the minimum terms of Article 28 of the GDPR will be in place, to protect the processing of such data. We require third party processors to respect the security of your data and to treat it in accordance with the law. Your information will be shared with the following categories of data processors:

- Website hosts ;
- IT service providers (EFL IT systems are currently provided through EFL, Premier League, and Elite IT);
- Secure e-mail services (such as Egress)

In exceptional circumstance, we may also need to share personal information with a regulator, Court, dispute resolution service or to otherwise comply with the law (or to law enforcement authorities where we may be legally permitted to do so).

7. Is my personal information held securely?

We have put in place measures to protect the security of your information, and will review this on an ongoing basis. We have put in place appropriate security measures to prevent personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed.

You will only be identifiable from your survey responses if you provide your e-mail address. Once we receive your survey responses we will de-identify the responses by detaching your e-mail address as soon as possible, and in any case within one month, meaning your responses will be anonymous.

In addition, we limit access to personal information to those employees, agents, contractors and other third parties who have a business need to know. They will only

process personal information on our instructions and they are subject to a duty of confidentiality.

Third parties will only process your personal information where they have agreed to treat the information confidentially and to keep it secure.

We have put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

8. How long is this personal information retained for?

We will only retain the personal information described in this notice for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

Once we receive your survey responses we will de-identify the responses by detaching your e-mail address as soon as possible, meaning your responses will be anonymous. This will be done within one month of submission, but we will endeavour to do this sooner.

Anonymous responses will be stored for a maximum of one month, before they are permanently deleted. We will keep your contact details for a maximum of one year in order to invite you to related focus groups.

9. What are my rights in connection with my personal information?

It is important that the personal information we hold about you is accurate and current. Please keep us informed if your personal information changes during your working relationship with us.

Your rights in relation to the processing of your personal data are listed below, however not all rights are absolute, and are only applicable in certain conditions:

- Right to be informed: This privacy notice is designed to ensure you are fully informed about how we will process your data. Where we collect your information for a specific purpose in future (such as a staff survey), we will provide further, specific information to ensure this right is exercised.
- Right of access: (commonly known as a "data subject access request"). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it. You can exercise the right of access by contacting the DPO.
- Right to request correction (also known as rectification): This enables you to have any incomplete or inaccurate data about you corrected. If we cannot correct the information for technical reasons, we will append a supplementary statement to the information.
- Request deletion (also known as right of erasure, or right to be forgotten): This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it. You also have the right to ask us to

delete or remove your personal information where you have exercised your right to object to processing (see below).

- Object to processing: this applies where we are relying on a legitimate interest (or those of a third party) and you want to object to processing on this ground. This also applies where we are processing your personal information for direct marketing purposes (and this right is absolute in relation to direct marketing – there are no further criteria required in this instance).
- Request the restriction of processing: You can ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or reason for processing.
- Right to withdraw consent: In the limited circumstances where you may have provided your consent to the collection, processing and transfer of your personal information for a specific purpose, you have the right to withdraw your consent for that specific processing at any time. If we require your consent to process any of your data, this will be made clear at the time we collect it.

Please note some of the above rights apply only in certain circumstances and/or are subject to conditions. For further information or to exercise any of these rights, please contact our Data Protection Officer.

More information about where these rights apply can be found here: <https://ico.org.uk/for-organisations/guide-to-data-protection/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/>

10. Who can I speak to about my personal information held by EFL Trust?

We have appointed a Data Protection Officer (DPO) to oversee compliance with this privacy notice. If you have any questions about this privacy notice or how we handle your personal information, please contact the DPO. You can e-mail your questions to DPO@efltrust.com.

You also 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.