

GREATER LONDON AUTHORITY UK SHARED PROSPERITY FUND

&

EFL TRUST

PRIVACY NOTICE

Background and nature of processing

The Greater London Authority UKSPF project aims to provide targeted support to young people in London who are not in employment, education or training.

The Greater London Authority ("Funder") have provided grant funding to EFL Trust, throughout this policy the EFL Trust will be referred to as the Grant Recipient.

The use of the data collected will be used solely for the purposes of delivering the project and for reporting to the Funder and Trustees project impact as per the Monitoring and Evaluation policy.

Data protection principles

The Grant Recipient will comply with data protection law. This means that the personal information we hold about data subjects must be:

- used lawfully, fairly and in a transparent way;
- collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes;
- adequate, relevant, and limited to what is necessary in relation to the purposes for which they are processed;
- accurate and kept up to date;
- kept in a form that identifies you for only as long as necessary for the purposes we have told you about; and
- kept securely.

The information held

Personal data is information that relates to an identified or identifiable individual and only includes information relating to natural persons who:

- can be identified or who are identifiable, directly from the information in question; and
- who can be indirectly identified from that information in combination with other information.

Special categories of data

Special categories of data is data which is particularly revealing. The UK GDPR defines special category data as:

- personal data revealing racial or ethnic origin;
- personal data revealing political opinions;

- personal data revealing religious or philosophical beliefs;
- personal data revealing trade union membership;
- genetic data;
- biometric data (where used for identification purposes);
- data concerning health;
- data concerning a person's sex life; and
- data concerning a person's sexual orientation.

The Grant Recipient will receive both personal data and special categories of data from the Funder regarding funding, as well as any data from Delivery Partners, including:

- Personal identifiers (for example name, title, national insurance number, email address, address, date of birth and phone number);
- Special categories of data (for example ethnicity, gender, criminal convictions);
- Miscellaneous data such as homelessness and care leaver data; and
- Employment details both pre and post participating in the project.

Lawfulness of processing the personal data

The Grant Recipient will only use and process data subject's personal information in accordance with data protection law.

The processing will fall under the statutory mechanics of the UK GDPR and the Data Protection Act 2018. There are several requirements listed in the DPA 2018 to ensure this is lawful. To carry out the processing, the Grant Recipient will only process data in accordance with the following legal basis of processing:

- Consent and/ or necessary for contractual performance.

With regards to the processing of special categories of personal data, the basis which is being relied upon is:

- Explicit consent.

Data security

The Grant Recipient has:

- put in place measures to protect the security of data subjects' information, and will review this on an ongoing basis;
- put in place appropriate security measures to prevent data subjects' personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed;
- limited access to data subjects' personal information to those employees, agents, contractors and other third parties who are reasonably required to access data subjects' data in the course of their employment and/ or engagement. Subject to these individuals also being subject to a duty of confidentiality which is no less onerous than the confidentiality Clause contained in the underlying Agreement with the Funder;

- 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 the Grant Recipient is legally required to do so;
- where possible, the personal data is minimised, aggregated, or anonymised; and
- put in place appropriate technical, physical and managerial procedures to safeguard and secure the information processed.

Data retention

The Grant Recipient will only retain data subjects' personal information for as long as necessary to fulfil the purposes the Grant Recipient has collected it for.

To determine the appropriate retention period for personal data, the Grant Recipient has considered the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of the personal data, the purposes for which the Grant Recipient processes the personal data and whether the Grant Recipient can achieve those purposes through other means, and the applicable legal requirements.

The Grant Recipient will retain the personal data described in this privacy notice for the length of the Grant Funding Agreement to enable the Grant Recipient to perform the obligations specified in the Grant Funding Agreement.

At the expiry of the retention period, information will be reviewed to assess whether it can be destroyed or whether retention is required for a further period. The Grant Recipient will only retain this further, where processing is compatible without our original purposes.

Data Subject Requests, Personal Data Breaches and Communications

The Grant Recipient shall promptly (and in any event within 24 hours) notify the Funder if the Grant Recipient suspects or becomes aware of any actual or threatened occurrence of any personal data breach in respect of any personal data.

Where appropriate, all affected data subjects will promptly be informed of any relevant breach.

Sharing of personal data

Your personal data will be shared with:

- The Funder; and/ or
- Club charitable organisations.

If you require any further details on this, please contact dpo@efitrust.com.

Automated decision-making

No decision will be made about you on the basis of automated decision making (where a decision is taken about you using an electronic system without human involvement).

Transfers outside of the UK

In certain circumstances we will send your information to countries outside the UK, where the level of protection for personal data is not deemed to be as high as that in the UK and the European Union.

We use cloud computing providers that store information outside the UK. We have agreements in place with these providers in order to ensure that there is adequate protection for your data.

Data subjects' rights

As a data subject, you have a number of rights under data protection law.

You can:

- access and obtain a copy of your data on request;
- require the EFL Trust or the Funder to change incorrect or incomplete data;
- require the EFL Trust or the Funder to delete or stop processing your data, for example where the data is no longer necessary for the purposes of processing;
- object to the processing of your data where the EFL Trust is relying on its legitimate interests as the legal ground for processing; and/ or
- ask the EFL Trust or the Funder to transfer your data to another organisation.

If you would like to exercise any of these rights or if you have any questions about this notice or our processing of your data more generally, please contact dpo@efltrust.com

If you believe that the EFL Trust or the Funder has not complied with your data protection rights, you can complain to the Information Commissioner's Office (<https://ico.org.uk/>)