#### **Electrification Skills Network ("ESN") Privacy Notice**



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### **Information About Us**

In this Privacy Notice, the terms "we", "our", and "us" refer to Electrification Skills Network, which is operated by CU Services Limited which is a wholly-owned subsidiary of The Coventry University Group. Coventry University Group is an umbrella term for Coventry University and all of the companies governed by Coventry University.

Electrification Skills Network is a UK wide initiative that connects industry, accrediting organisations and skills providers to establish electrification skills provisions.

Your personal information will be processed by us and may be shared with members of the Coventry University Group, training and education providers or employers.

#### Scope

This privacy notice gives you details about how we will process your personal data when you engage in our services and how it is shared.

We are a data controller of your personal information, which means we are responsible for looking after it. We will use your personal information fairly, lawfully and transparently, and according to the data protection laws.

This notice does not cover other organisations outside of Coventry University Group you provide personal information or where the information is shared with our employer clients and regulatory bodies. Those companies have their own privacy notices, so remember that the information you give them will follow their rules and not ours.



If you have any questions, comments, complaints or suggestions in relation to this notice, want to exercise your rights or have any other concerns about the way in which we use personal information about you, please contact the Information Governance Unit. You can email enquiry.igu@coventry.ac.uk or write to the Information Governance Unit, Coventry University, Portal House, 163 New Union Street, Coventry, CV1 2PL, and a member of our dedicated team will respond to you.

Alternatively, you can contact our Data Protection Officer by writing to Data Protection Officer, Coventry University, Portal House, 163 New Union Street, Coventry, CV1 2PL or emailing dpo@coventry.ac.uk.

We will do our best to help you with your query and/or resolve any issues. If you're still unhappy, you can contact the Information Commissioner's Office (ICO). Their website www.ico.org.uk has details on how to contact the ICO or via their helpline on 0303 123 1113.

## $\stackrel{\mathbf{i}}{\triangleright}$ Personal information we collect about you

The type of personal information we collect about you and how we collect it can vary depending on your interactions with us.

Personal information means any information we hold about you from which you can be identified and which relates to you. It may include things like your name and contact details.

For more details about the personal information we collect about you, please look at the table in Schedule 2.

### How we collect your personal information

We collect your personal information directly from you, other people or organisations.

Please see below for more information.

#### Information you give us

Information you provide us when you complete forms or surveys, or register interest in hearing about ERS Hub and our services.

Information you provide when you fill in forms on our online portal or website, including where you register on our website or submit a query via our portal or website.

Information you provide to us where you give information about yourself in any communications, either by telephone, email, post, social media or otherwise.

#### Information we collect about you

Details of your visits to our websites, portal including, but are not limited to, Internet Protocol (IP) address used to connect your computer to the internet, MAC addresses, traffic data, location data, your login information, time-zone setting, browser type and version, browser plug-in types and versions, operating system and platform, weblogs, cookies and other communication data, and the resources that you access. For more information, please see our Cookie Notice.

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#### How we use your personal information

We use your information in a number of different ways — what we do depends on the information.

We use your personal information in a variety of ways, for example:

- To send you newsletters regarding the Electrification Skills Network, where you have subscribed to our service;
- To arrange and send you information on events and provide you with an acceptable service;
- To respond to your enquiries, where you have registered your interest in the Electrification Skills Network.
- To promote our services, where you have expressed interest in the Electrification Skills Network.

We have to have a valid reason to use your personal information. It's called the "lawful basis for processing". The table in Schedule 2 will provide you with more information about how we use your personal information and our reasons (lawful basis) for doing so.

#### Your choices about the personal information you give to us

We may use your personal information to send you direct marketing by post, phone, social media, email and text.

We can only use your personal information to send you direct marketing material if we have your permission or legitimate interest in doing so. We have given you the option to opt out of receiving such marketing materials.

If you don't want to receive emails or text messages from us, we'll provide you with the opportunity to opt-out, and you will be notified of this at the time you receive the communication.

This will not apply to emails, text messages, or any other communication methods we use to contact you as part of you engaging our work-seeking services.

#### Profiling and automated decision-making

We do not use profiling or automated decision-making to process your personal information.

#### $\stackrel{\textstyle \rightharpoonup}{\leftarrow}$ Who we share your personal information with

We will share your personal information within Coventry University Group and our partners engaged in our services.

In addition, we may share your personal data where it is permitted or required by law, on a considered and confidential basis and with a range of external organisations. Please see <u>Schedule 3</u> for further information about who we share your personal information.

We may engage third parties to provide processing activities where it is necessary, and we have a reason (a lawful basis) to do so. We require that all third parties who process personal data on our behalf treat it according to applicable data protection laws. We do not allow our third-party service providers to use your personal data for their own purposes but only to process it for specified purposes and according to our instructions. Such processing is to be conducted under a formal agreement, which includes provisions around the processing of personal data, and which provides appropriate safeguards.

Sharing your personal information outside of the UK

We will not share your personal data outside of UK. However, if our services expand and where we may be required to share personal data outside UK or EEA, In these circumstances, sharing your personal information is subject to special rules under UK data protection law. Whenever we share your personal information outside of the UK, we shall ensure that:

- We will only transfer your personal information to countries that have been deemed to
  provide an adequate level of protection for personal information by the UK Government.
  Currently, the UK Government recognises EU and EEA member states as having adequate
  levels of protection for personal information, as well as those other countries currently
  recognised by the European Commission as having such adequate protections; and
- Where we use certain service providers or partners who are based in countries which the UK Government does not deem to have adequate levels of protection for personal information, we may use specific contracts approved by the UK Government which give personal information the same protection it has within the UK, EU and EEA.

Please contact us at <a href="mailto:enquiry.igu@coventry.ac.uk">enquiry.igu@coventry.ac.uk</a> if you would like further information about the specific mechanism used by us when sharing your personal information outside of the UK.

We keep our mechanisms for transferring personal data outside of the UK and/or the EEA under regular review to ensure that these are in line with UK data protection laws.

### How long do we keep your personal information?

We only hold your personal information for as long as we do the activities we told you about or have a valid reason to keep it. We consider a number of factors in deciding how long to keep your information:

- The nature and sensitivity of the information.
- The potential risk of harm from unauthorised use or disclosure of the information.
- The purposes for processing the information and how long it will take to achieve those purposes.
- How long it is reasonable to keep records to show we have met the obligations we have to you and by law.
- Any time limits for making a legal claim.
- Any periods for keeping information set by law or recommended by regulators, professional bodies or associations.
- Any relevant legal proceedings that apply.

In some circumstances, we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes, in which case we may use this data indefinitely without further notice to you.

If you want more information about how long we keep your information, please contact the Information Governance Unit via <a href="mailto:enquiry.igu@coventry.ac.uk">enquiry.igu@coventry.ac.uk</a>.

### *⊗* Keeping your personal information secure

We employ appropriate security measures to prevent information from being accidentally lost, used, or accessed unlawfull.

We publish an Information Technology Policy that describes how IT is governed. We underpin the Policy with additional protective controls and standards and work with our suppliers and partners to embed security by design.

### **™** How we may contact you

Please note that we may contact you by post, email, telephone, text, social media, or any other suitable electronic method in connection with the purposes set out above. We'll never contact you to ask for your account password.

## Your rights in relation to your personal information

It is your personal information, so we need to make you aware of your rights and how to exercise them.

Your rights	What this means for you
Access	The right to be provided with a copy of your personal information (subject access request)
	To request your data, please complete the Data Subject Rights Request form available <a href="here">here</a> .
Rectification	The right to require us to correct any mistakes in your personal information. This enables you to have any incomplete or inaccurate data that we hold about you corrected, although we may need to verify the accuracy of the new personal data that you provide to us.
	To request your data to be rectified, please complete the Data Subject Rights Request form available <a href="here">here</a> . Please note that we may not always be able to comply with your request for rectification, for example, where the request relates to an opinion. In some cases, we may still retain the historic data or audit trails to demonstrate the changes made to your data.
Erasure	The right to require us to delete your personal information, in certain situations.
	To request your data to be rectified, please complete the Data Subject Rights Request form available <a href="here">here</a> . Please note that we may not always be able to comply with your request of erasure for specific reasons, which will be notified to you, if applicable, at the time of your request.
Restriction of processing	The right to require us to restrict the processing of your personal information in certain specific circumstances, e.g. if you contest the accuracy of your personal information.
	To make a request for your data to be rectified, please complete the Data Subject Rights Request form available <a href="here">here</a> .
To object	The right to object:
	— at any time to your personal information being processed for direct marketing (including profiling);
	—in certain other situations to our continued processing of your personal information, e.g. processing carried out for the purpose of our legitimate interests. In some cases, we may demonstrate that we have a compelling reason to continue to process your personal information,

	despite any objection, as is necessary for our public interest tasks, the exercise of an official authority vested in us, or for our legitimate interests or those of a third party which override your rights and freedoms.  If you wish to exercise your right to object, please complete the Data Subject Rights Request form available here.	
Data portability	In certain situations, the right to receive the personal information you provided to us in a structured, commonly used and machine-readable format and/or transmit that personal information to another organisation.  To request your data to be provided in a commonly used format, please complete the Data Subject Rights Request form available <a href="here">here</a> .	
Not to be subject to automated individual decision making	The right not to be subject to a decision based solely on automated processing (including profiling) produces legal effects concerning you or similarly significantly affects you. We do not currently use tools which involve automated decision-making.	
Withdraw consent	Where we rely on consent to process your personal information, you may withdraw that consent at any time. You will be provided with information on how to withdraw consent when it is collected from you.	
Right to complain	If you are concerned about how we have processed your personal information, you can complain to the Information Commissioner's Office (ICO). Please visit the ICO's website <a href="https://www.ico.org.uk">www.ico.org.uk</a> for further details, or you can use their online tool for reporting concerns: <a href="https://ico.org.uk/concerns/">https://ico.org.uk/concerns/</a>	
	Please be aware ICO requires an organisation's internal complaints process to be exhausted. For details on how to submit a complaint to us, please see our Data Protection Complaints Procedure available on our website at <a href="https://www.coventry.ac.uk/gdpr-and-data-protection/key-contacts/">https://www.coventry.ac.uk/gdpr-and-data-protection/key-contacts/</a>	

If you wish to exercise any of your rights or would like any further information, please send a written request to the Information Governance Unit, Coventry University, Portal House, 163 New Union Street, Coventry, CV1 2PL or email <a href="mailto:dsar@coventry.ac.uk">dsar@coventry.ac.uk</a>.

#### Changes to this privacy notice

We reserve the right to update this privacy notice at any time, and we will make an updated copy of such privacy notice available on ERS Hub website.

### Schedule 1

This privacy notice applies to the processing of your personal information by:

Entity	ICO Registrati on Number	When your personal information might be processed
CU Services Limited  Priory Street Coventry, United Kingdom CV1 5FB	ZA027495	CU Services Limited manages Electrification Skills Network, your personal data will be processed for the purpose of connecting industry, accreditation organisaions and skils providers to establish a collaboration on electrification skills provisions.

**Schedule 2** -The table below provides further details about the information we collect about you.

Data category	Description	Why do we process this information	Lawful basis
	(type of data this includes)		(legal justification)
Identification Data	<ul> <li>First Name;</li> <li>Last Name;</li> <li>Email Address;</li> <li>Alternative email address;</li> <li>Company/ Organisation name;</li> <li>Phone number;</li> <li>Dietery or accessibility Information;</li> </ul>	<ul> <li>To contact you to discuss our services and inform you of any opportunities with ESN or our partners.</li> <li>To respond to any enquiries you make or feedback you leave.</li> <li>Where you complete a survey that we use for research purposes, we will retain the information you provide in response to that survey. Where your survey response includes identification and contact data, this will be processed as necessary for analysing the needs and interests of our services.</li> <li>We may use your identification and contact data, technical and/or usage data to form a view on what we think you may be of interest to you and in</li> </ul>	Contract/ Legitimate Interest Contract/ Legitimate Contract /Legitimate Interest  Legitimate Interest
		<ul> <li>data to form a view on what we think you may be of interest to you and, in doing so, we will only send you information that is deemed relevant to you.</li> <li>To monitor how our website is used, including information regarding the number of visitors to the various parts of the website, and to help us</li> </ul>	Contract /Legitimate Interest
		improve the content of the website and customise its content or layout for you. We collect this information in a way that does not identify you and we do not make any attempt to find out the identities of those visiting our website.	Legitimate Interest
		<ul> <li>If you contact us to report a fault with our website, we will use the information provided for the purposes of rectifying that fault.</li> </ul>	
		• If you exercise your rights under the Freedom of Information Act, Environmental Information Regulation or Data Protection Act. All correspondence and relevant documents/information shall be recorded and kept in line with our policies.	Legitimate Interest
		If you report a personal data breach or raise a complaint, we will record	Legal

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Data category	Description (type of data this includes)	Why do we process this information	Lawful basis (legal justification)
		<ul> <li>and keep a record of the correspondence and relevant documents/information in line with our policies.</li> <li>Providing management information and testing functionality of our systems developments</li> <li>To enable us to meet our legal and contractual obligations, as set out in the terms and conditions and other contracts.</li> <li>Where you attend our events, we will use your personal data to provide you with the requested services and adjustments.</li> </ul>	Obligation  Legal Obligation  Legitimate Interest Legal Obligation/Cont
Image Data	Photographs/     Stills/Digital Images	To support the marketing and the promotion of ESN by using photographic images on our website, and in other promotional material.	ract Consent/ Legitimate Interest
Monitoring Data	IT Usage data for example, browser history	<ul> <li>We use this information to assess compliance with ESN policies, standards and procedures.</li> <li>To monitor your use of our information and communication systems to ensure compliance with our Terms and Conditions, including preventing unauthorised access to our computer and electronic communication systems and preventing malicious software distribution.</li> </ul>	Contract/Legal Obligation
Testimonial Data	<ul><li>Survey Data</li><li>Testimonials</li></ul>	<ul> <li>Personal information (not anonymised) provided by you when responding to surveys, feedback forms or testimonials (in writing, video or other formats).</li> </ul>	Contract or Consent
Reporting Data	<ul><li>Statutory returns</li><li>Internal and external audits</li></ul>	<ul> <li>Making external returns to governmental, regulatory or funding bodies.</li> <li>Providing disclosures of personal information to support internal and external audits.</li> </ul>	Legal obligation
	•	•	Contract and Legal Obligation

Data category	Description (type of data this includes)	Why do we process this information	Lawful basis (legal justification)
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#### **Schedule 3**

### Who we share your information with

Electrification Skills Network partners and services users, where this is required to conduct the service.

The Police and other crime prevention and detection agencies for crime prevention or detection purposes;

Government agencies pursuant to a valid request and where required by the law;

External third-party bodies for statistical reporting purposes;

Third parties engaged in providing services to us;