

## **PRIVACY NOTICE – INFUSE Innovative Future Services**

The wording in this document reflects the requirements of the General Data Protection Regulation (GDPR) and the Data Protection Act (2018).

**MCC Service Area:** Enterprise and Community Animation

**Contact Details:** Owen Wilce, owenwilce@monmouthshire.gov.uk

**Privacy Notice Name:** Infuse

This notice is intended for people who are associated to, seconded to, or contracted to Infuse.

### **Data controller:**

Welsh Government / Welsh European Funding Officer

Rhydycar Business Park, Rhydycar, Merthyr Tydfil, CF48 1UZ

### **Data Processor:**

Monmouthshire County Council

County Hall, The Rhadyr, Usk, Monmouthshire. NP15 1GA.

### **Data Sub-processors:**

Cardiff University (Y-Lab)  
56 Park Pl, Cardiff CF10 3AT

Nesta  
58 Victoria Embankment, London, EC4Y 0DS

Miller Research (UK) Ltd  
Pen-y-Wyrlod, Llanvetherine, Abergavenny NP7 8RG

### **Data Protection & Information Governance Officer:**

<b>Welsh Government</b>	<b>Monmouthshire County Council</b>
<b>Data Protection Officer Welsh Government Cathays Park Cardiff CF10 3NQ  dataprotectionofficer@gov.wales</b>	<b>Data Protection Officer County Hall Rhadyr Usk NP15 1GA  dataprotection@monmouthshire.gov.uk</b>

### **1) Where have we sourced your personal data?**

Most of the data we collect comes directly from you. This will be from forms that you complete as part of the expression of interest, the application process, or eligibility evidence document that you provide.

Your employer will provide us with data to evidence the expenditure contributions they are making through your time on Infuse.

## 2) What information do we collect about you?

Infuse collects and processes a range of information about you.

This includes:

Personal Identifiers: **name**.

Your contact details: **email address, telephone number**.

Welsh language data such as your **preferred language for communication and for study**.

Data relating to the activities you undertake including **attendance, time sheets (where required)**.

Employment details including, **your application, job role/title, job description, contract of employment, secondment letter, letter of association**

**Total monthly employment costs** contributed to the project (on an individual level this is payslip, BACS report, Employer National Insurance & Pension Contributions).

## 3) We may collect this information in a variety of ways:

Your data is collected from you/your employer as outlined in section 1.

We hold the data in an electronic record in a secure internal database accessible only to a limited number of authorised staff.

## 4) Why do we need to process your personal data?

1. To monitor and evaluate projects at operation management and governance boards and as part of the operation's external evaluation so as to assess the effectiveness of working practices, delivery of projects and project outputs and impacts in line with funding requirements;
2. To report to the Welsh Government, WEFO and the European Commission for regulatory operation monitoring, claim and audit purposes. These bodies may also use your data for the purposes of research, evaluation and verification regarding Financial Support from the Structural Funds.
3. To maximize the impact of the project by carrying out research that will deliver broader societal benefits;
4. To keep in touch as part of the Infuse Alumni Network

The relevant section of the GDPR for collecting personal data in relation to the Structural Funds is Article 6(1)(e) where:

“processing is necessary for the performance of a task carried out in the exercise of official authority vested in the controller”.

The European Social Fund (ESF) Regulations for the 2014-2020 programming period lay down the requirements for monitoring of operations and subsequent reporting by Member States (1304/2013)

As from 1 January 2021 public bodies no longer need to adhere to EU policies, frameworks, processes in managing public funds. This does not apply to the EU Structural Fund Programmes as per the terms of the Withdrawal Agreement (Article 138).

## **5) Special categories of personal data:**

It may be necessary for us to collect some information about your health and wellbeing to enable us to support your participation. We will also collect some data which we will use to anonymously monitor equality and diversity.

## **6) Who will we share your data with?**

Your data will be shared with the evaluation company who are contracted to undertake an evaluation of the Infuse operation. Only the minimum required data will be shared. The evaluators may contact you as part of the evaluation process.

Monitoring data (including the individual associate records) will also be shared with relevant Welsh Government teams and European Commission (EC) auditors to help determine whether the project has followed the correct procedures and to ascertain the validity of claims. The eligibility information will also be shared with these teams for such purposes. Welsh Government may also share both types of data with independent auditors.

## **7) Is the Data transferred out of the EEA?**

Airtable – We use Airtable as a planning and scheduling platform. The only information stored on there is your name, email address (log in required) and your attendance at sessions. None of this information is visible to other members only a selected delivery staff. Airtable's servers are in the United States, their privacy Policy is [here](#). **You may opt out of using this platform.**

Vimeo – All sessions are recorded for the associates who were unable to attend to catch up. These recordings are hosted on Vimeo, all recordings are password protected and only associates within your cohort will have access. Links to the Vimeo's are found on Airtable. Vimeo servers are in the United States, their Privacy Policy is [here](#).

## **8) How do we protect data and who has access?**

All personal data detailed above will be stored on Sharepoint within Monmouthshire County Council, with restricted access to limited staff, before subsequently being uploaded to WEFO Online. The privacy notice for WEFO Online can be viewed at <https://gov.wales/wefo-online-privacy-notice-html>. Your personal data will also be stored on AirTable and Vimeo.

The processor and sub-processors have internal policies in place to ensure the data it processes is not lost, accidentally destroyed, misused or disclosed. Access to data is restricted to staff who need the information to perform their duties. Furthermore data is not accessed by employees except in the performance of their duties.

Where the processor engages third parties to process personal data on its behalf, they do so on the basis of written instructions. These third parties are also under a duty of confidentiality and are obliged to implement appropriate measures to ensure the security of data.

## **9) How long do we keep your data?**

We will retain all data until at least December 31<sup>st</sup> 2026 in line with Welsh European Funding Office requirements.

The Council may hold your personal data for a longer period than this, in line with organisational and Local Authority standards in this area and our retention schedules. Your data will then be destroyed. We will hold it for no longer than is necessary.

**10) Are we making automated decisions/profiling with your data?**

No

**Your rights**

You have a number of rights you can exercise:

- access and obtain a copy of your data on request.
- require the Council to change incorrect or incomplete data.
- under certain circumstances you can require the Council to delete or stop processing your data, for example where the data is no longer necessary for the purposes of processing.
- to know the period of time that the data will be stored for.
- the right to data portability.
- the right to withdraw your consent at any time.
- the right to lodge a complaint with a supervisory authority (Information Commissioners Office).
- to be informed of the potential consequences of if you fail to provide data to the Council.
- to be informed of the existence of any automated decision-making, including profiling and the consequences of this for you.

If you would like to exercise any of these rights, please contact Owen Wilce

[OwenWilce@monmouthshire.gov.uk](mailto:OwenWilce@monmouthshire.gov.uk)

For your information the Information Commissioner's Office website and contacts are available here: <https://ico.org.uk>