

**Privacy Notice**

This notice sets out how we will use your personal data, and your rights. It is made under Articles 13 and/or 14 of the UK General Data Protection Regulation (UK GDPR).

**YOUR DATA**

*The data*

We will process the following personal data:

* Identity Data including first name, last name, title, and gender.
* Contact Data including business address(s), email address and telephone numbers.
* Ethnicity, disability, and gender of employees / owners of SMEs that participate in the Made Smarter Adoption programme and of students who take part in Made Smarter digital internships.

*Purpose*

The purpose(s) for which we are processing your personal data is:

We are processing this data in order to monitor the delivery of and evaluate the impact of the Made Smarter Adoption programme to support SME manufacturers with adopting industrial digital technology.

*Legal basis of processing*

The legal basis for processing your personal data is:

* **Public task:** Processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the data controller, such as the exercise of a function of the Crown, a Minister of the Crown, or a government department; the exercise of a function conferred on a person by an enactment; the exercise of a function of either House of Parliament; or the administration of justice. *Made Smarter Adoption is a DBT-funded programme aiming to improve digital adoption among SMEs in regions of England. DBT needs to monitor this expenditure and the outcomes that it delivers. DBT is keen to understand how accessible and inclusive the Made Smarter Adoption programme is to different groups and therefore want to collect information on specific protected characteristics of beneficiaries.*

*Special Category Data*

Special Category data (also commonly known as Sensitive personal data) is personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, and the processing of genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person's sex life or sexual orientation.

The legal basis for processing your sensitive personal data is:

* that processing is of a specific category of personal data and it is necessary for the purposes of identifying or keeping under review the existence or absence of equality of opportunity or treatment between groups of people specified (in paragraph 8(2) of Part 2 of Schedule 1 to the Data Protection Act 2018) in relation to that category with a view to enabling such equality to be promoted or maintained; and it is not carried out for the purposes of measures or decisions with respect to a particular data subject; and you have not declined consent; and you have not given notice that you do not wish your data to be processed for these purposes; and the processing is not likely to cause substantial damage or substantial distress to an individual; and an appropriate policy document is in place. *Data processed on this basis includes data on ethnicity, disability and gender of those supported by the Made Smarter Adoption programme.*
* processing is necessary for reasons of substantial public interest for the exercise of a function of the Crown, a Minister of the Crown, or a government department; the exercise of a function conferred on a person by an enactment; the exercise of a function of either House of Parliament; or the administration of justice; and an appropriate policy document is in place. *These functions include:*
	+ *Statutory and government purposes;*
	+ *Equality of opportunity or treatment;*
	+ *Racial and ethnic diversity at senior levels.*

*Recipients*

Your personal data will be shared by us with an evaluation supplier of our appointing.

As your personal data will be stored on our IT infrastructure it will also be shared with our data processors Microsoft and Amazon Web Services.

*Retention*

Your personal data will be kept by us for five years. We anticipate that benefits to firms supported by the programme will accrue over a number of years. It is important that we are able to make contact with beneficiaries at stated intervals throughout this period to fully understand and evaluate the impact of Made Smarter Adoption support.

*Where personal data has not been obtained from the data subject*

Your personal data were obtained by us from the organisations overseeing delivery of Made Smarter Adoption support in each supported region.

*Your rights*

You have the right to request information about how your personal data are processed, and to request a copy of that personal data.

You have the right to request that any inaccuracies in your personal data are rectified without delay.

You have the right to request that any incomplete personal data are completed, including by means of a supplementary statement.

You have the right to request that your personal data are erased if there is no longer a justification for them to be processed.

You have the right in certain circumstances (for example, where accuracy is contested) to request that the processing of your personal data is restricted.

You have the right to object to the processing of your personal data where it is processed for direct marketing purposes.

You have the right to object to the processing of your personal data.

*International transfers*

As your personal data is stored on our IT infrastructure and shared with our data processors Microsoft and Amazon Web Services, it may be transferred and stored securely outside the UK & European Economic Area. Where that is the case it will be subject to equivalent legal protection through the use of Model Contract Clauses.

*Complaints*

If you consider that your personal data has been misused or mishandled, you may make a complaint to the Information Commissioner, who is an UK independent regulator. The Information Commissioner can be contacted at:

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

0303 123 1113

casework@ico.org.uk

Any complaint to the Information Commissioner is without prejudice to your right to seek redress through the courts.

*Contact details*

The data controller for your personal data is the Department for Business and Trade. You can contact the Department’s Data Protection Officer at:

DBT Data Protection Officer
Department for Business and Trade
Old Admiralty Building, Admiralty Pl
London
SW1A 2DY

Email: data.protection@trade.gov.uk