

## UNIVERSITY OF WOLVERHAMPTON, e-INNOVATION CENTRE PRIVACY NOTICE

### WHO WE ARE

Throughout this policy, the terms 'we', 'us', 'our', 'EIC', 'e-innovation Centre', or 'University of Wolverhampton', refers to:

The e-Innovation Centre, which is a department of the University of Wolverhampton.

The University of Wolverhampton's e-Innovation Centre are a 'Data Controller' for the purposes of the Data Protection Legislation (including the Data Protection Act 1998 and the General Data Protection Regulation) and we are responsible for, and control the processing of, your personal information.

### YOUR PRIVACY

The e-Innovation Centre takes the privacy and security of your personal information as being very important in everything we do. This privacy policy explains how and why we use your personal data to help keep you informed, and why you can be confident that we will use your information only in the ways described within this policy.

This policy applies if you are a tenant (prospective, current, past or associate member), user of our general services / facilities, subscriber to any of our communication methods, visit our website(s), use any mobile applications we may introduce, write to us by letter or e-mail, or call us by telephone.

In certain circumstances we may also provide an extra privacy notice, which will always refer to this main policy.

We will never sell your personal data and will only share it with organisations we work with when we feel it is necessary and the privacy and security of your data is assured.

### INFORMATION WE MAY COLLECT FROM YOU

Your personal data (any information which identifies you, or which can be identified as relating to you personally for example, name, address, phone number, email address, photograph) may be collected and used by us. We will only collect the personal data that we need. We collect personal data in connection with specific activities such as enquiries for business accommodation / conferencing activity, contracting activities, operation of business premises, provision of internet and telephony services and providing access to business support services / providers.

We can obtain your personal information about you from the following sources:

#### **a) The University of Wolverhampton and its associated group of companies:**

- i. as a service referral where your personal information may be transferred from the University's central database(s) to our local database.

**b) Information provided by you:**

- i. corresponding with us by phone, email, letter, social media or in person
- ii. filling in a form through one of our websites
- iii. completion and/or return of a survey or response/feedback form such as contact preference form, including by mail and via electronic means
- iv. registration to attend an event
- v. as part of discussions with any of our team or representatives
- vi. registering to receive communications, including by mail and via electronic means
- vii. register with or link to a third party account such as LinkedIn, Facebook, Twitter or Google.

**c) Other Third Parties:**

- i. Organisations that assist the University of Wolverhampton's e-Innovation Centre in pursuing the purposes described below, media articles, company or charity registers and filings, and other sources available to the public at large, such as the world wide web.

**d) Cookies, automatic electronic collection and third party websites:**

Our main website, [www.e-innovationcentre.co.uk](http://www.e-innovationcentre.co.uk) uses cookies in the manner outlined below. More information on how to manage cookies can be found [here](#).

- i. Cookies are small text files stored on your computer when you visit certain websites. Some of our websites use cookies to personalise your online experience. We also use third party cookies (cookies that are set by an organisation other than the owner of the website) for the purposes of website measurement and targeted advertising. You can control the use of cookies via your browser. Further information can be found in our Cookie Policy.

- ii. Technical information, including the Internet protocol (IP) address used to connect your computer to the Internet, your login information, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform. If you access our website via your mobile device we will collect your unique phone identifier.
- iii. Information about your visit, including, but not limited to the full Uniform Resource Locators (URL) and query string, clickstream to, through and from our website (including date and time), areas you viewed or searched for, page response times, download errors, length of visits to certain pages, page interaction information (such as but not limited to, scrolling, clicks, and mouse-overs), methods used to browse away from the page, and any phone number used to call our advertised number.
- iv. The terms that you use to search our website.
- v. Our website may, from time to time, contain links to and from the websites of our partner networks, advertisers and affiliates. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for those policies. Please check those policies before you submit any personal data to those websites. This privacy policy applies solely to the personal data collected by the University of Wolverhampton's e-Innovation Centre.
- vi. Please note that certain services on our website may not be available to you until you've registered to use our website.

The personal information we may process about you may include:

- a) your title, full name (including former name or alias) and gender,
- b) your contact information (address, telephone number(s), email address),
- c) your photograph,
- d) your business details, including positions and organisation name,
- e) your financial information (including your bank/building society details, whether personal or business related,
- f) information available through the media or the world wide web,
- g) your family/next of kin details, including your spouse/partner,

- h) CCTV images,
- i) other information you share with us.

Personal information we collect about you may include "special categories" data, such as information about your racial or ethnic origin, religious or other beliefs, physical or mental health and criminal offences/proceedings. "Special categories" data would only be processed where you have provided it yourself (with your consent), for example during discussions with any of our representatives or where such is recorded for the purposes of assessing accessibility requirements arising as a result of a disability, or where this information has already been made public or processing is required by law.

## HOW WE USE YOUR PERSONAL DATA

We collect personal data in connection with specific activities such as enquiries for business accommodation / conferencing activity, contracting activities, operation of business premises and associated services, providing access to business support services / providers and provision of performance feedback. Collection of this data enables us to deliver these services and to better understand our community so that we can better meet your needs and improve our services.

### **a) Tenant related activities:**

There are some communications that we need to send. These are essential to fulfil our role as Landlord to a Tenant base / consumers of our services and need to be directed to the correct areas of an organisation or individual.

- i. Contractual queries concerning occupation or services used.
- ii. Operational awareness such as service disruptions, security bulletins, etc.
- iii. Commercial related mailings such as payment reminders, notice of Landlord / Tenant meetings, etc.

In addition, we use the information provided to operate a site-wide access control and identification system.

### **b) Administrative purposes:**

- i. to verify your identity and provide you with a personalised experience upon any registration with the University of Wolverhampton's e-Innovation Centre.
- ii. to provide event registration and management.

- iii. to keep a record of communications between us and you.
- iv. to respond to enquiries / queries received.

**c) Start-Up related services:**

- i. to investigate / provide access to business start-up support services provided by third parties.
- ii. to contribute to business planning activities to support business survival and growth.

**d) Research:**

- i. from time-to-time we may carry out research with our tenants, customers, stakeholders and staff to gain feedback on their experience of our service delivery. We use this feedback to improve the experiences that we offer and ensure we know what is relevant and interesting to you.
- ii. if you choose to take part in any such research, we will tell you when you start what data we will collect, why and how we will use it. For some of our research we may ask you to provide sensitive personal data (e.g. ethnicity). You don't have to provide this data and we will provide a 'prefer not to say' option. We will only use it at an aggregate level for reporting purposes (e.g. equal opportunities monitoring).
- iii. we may give some of your personal data (e.g. contact information) to a third party research agency who will carry out research on our behalf. This will only occur where we are confident that the third party will treat your data securely, in accordance with our terms and inline with the requirements set out in the GDPR.

**e) Commercial Due Diligence:**

- i. to verify commercial and personal attributes of all new / prospective tenant organisations / individuals. Such data will be sourced from public domain sources and supplementary information provided by you.

**f) Profiling and automatic decision making:**

- i. in some areas we may use analytical tools such as Google Analytics, to profile how you interact with us online. Much of the information we collect is aggregated, however we may also collect some personal data for the use of personalising your experience, optimising our marketing campaigns, and to ensure the site is

functioning as intended. If you do not wish to be subject to such profiling please contact us – see 'How To Contact Us' below.

- ii. this analysis may be carried out by us or by third party organisations working for us. We may also host encrypted personal data on third party websites (e.g. social media platforms) to ensure that you only see relevant, personalised and interesting content from those organisations.

**g) General Communications:**

- i. to keep you up to date with events and activities at the University of Wolverhampton's e-Innovation Centre and its select support organisations.
- ii. to share news and achievements of the e-Innovation Centre, tenant community, University of Wolverhampton and its staff/student/business support/research services, strategic developments within the region or nationally.
- iii. invite you to events, which may be of interest to you.
- iv. to keep you up to date with other relevant information, which we think may be of interest to you.

If you would like to opt-out of the above General Communications, please let us know. See 'How to Contact Us' below for further information.

**h) Events / Meeting Management:**

- i. to process meeting room, events and catering bookings.
- ii. to confirm we've received your order and to clarify where we might need more detail to fulfil a booking.
- iii. to resolve issues that might arise with your booking.
- iv. to accommodate any dietary or special access requirements for events.

## WHO YOUR INFORMATION MAY BE SHARED WITH

Your personal information is held electronically and in hard copy format. We may disclose your personal data to other companies within the University of Wolverhampton group, third parties working in partnership or on behalf of the University of Wolverhampton's e-Innovation Centre and the University of Wolverhampton, and/or Government Agencies where required to do so by law.

We do not transfer your personal information to third parties outside the EEA without adequate levels of protection, where they are transferred outside the EEA they are clearly identified in our Data Audit and assessed as GDPR compliant or EU/US Privacy Shield certified.

Where personal data is processed by a third party, we take reasonable steps to ensure that the data is processed strictly according to the instructions of the University of Wolverhampton's e-Innovation Centre, for the relevant purposes only and securely destroyed or returned upon completion/termination. We take reasonable steps to ensure that third party processors are subject to written legal obligations in respect of data protection and the duty of confidentiality.

We do not sell or rent any personal information or data supplied by you. We may compile aggregate statistics and provide them to third parties, but we do not include personal information that identifies individual users.

## RETENTION

We may retain your personal information for as long as necessary and in line with our statutory/regulatory obligations where appropriate.

If you wish to request for any of your records to be removed from our database, or would like to opt-out of communications from the University of Wolverhampton's e-Innovation Centre, please see 'How to Contact Us' and 'Rights of Data Subjects' below for further information.

## RIGHTS OF DATA SUBJECTS

### **a) Right to request a copy of your information**

You can request a copy of your information which we hold (this is known as a subject access request). If you would like a copy of some or all of it, please visit the University of Wolverhampton's Data Protection web pages available [here](#) or e-mail [dataprotection@e-innovationcentre.co.uk](mailto:dataprotection@e-innovationcentre.co.uk).

### **b) Right to correct mistakes in your information**

You can require us to correct any mistakes in your information which we hold free of charge. If you would like to do so, please write to us (see 'How to Contact Us' below) and provide us with enough information to identify you, as well as, inform us of the information that is incorrect and what it should be replaced with.

### **c) Right to ask us to stop contacting you with direct marketing**

If you would like to unsubscribe from the University of e-Innovation Centre marketing related mailings you can do so by contacting us at [dataprotection@e-innovationcentre.co.uk](mailto:dataprotection@e-innovationcentre.co.uk) or following this link.

## LAWFUL BASIS FOR PROCESSING

The University of Wolverhampton's e-Innovation Centre may rely on one or multiple grounds for processing your personal data including:

- a) You have provided consent for the processing.
- b) There is a contractual commitment to provide the services and, therefore, processing is necessary to meet those contractual obligations.
- c) Supporting the safety and general success of tenants, visitors and staff is in the public interest, in particular, allowing for the Centre's mission to be a contributor to the economic growth of Shropshire and the subsequent benefits to society.
- d) The information is available to the public at large.
- e) The processing is necessary for the purposes of legitimate interests of the University of Wolverhampton's e-Innovation Centre or other third parties and does not affect the fundamental rights and freedoms of the individuals concerned.

## HOW TO CONTACT US

Should you have any queries, suggestions or issues please do not hesitate to contact the e-Innovation Centre Commercial Office below:

e-Innovation Centre  
University of Wolverhampton  
Telford Campus  
Priorslee  
Telford  
TF2 9FT  
**Tel:** 01952 288200  
**e-mail:** [dataprotection@e-innovationcentre.co.uk](mailto:dataprotection@e-innovationcentre.co.uk)

If you have any concerns or believe that your personal information is being handled in a manner which is contrary to statutory requirements, you may wish to contact the University of Wolverhampton's Data Protection Officer in writing via the address details below, or complain to the ICO via <https://www.ico.org.uk>

Data Protection Officer  
Legal Services  
Offices of the Vice-Chancellor  
Wulfruna Building  
Wulfruna Street  
Wolverhampton  
WV1 1LY  
email: [dataprotection@wlv.ac.uk](mailto:dataprotection@wlv.ac.uk)



**Document Control**

Document Reference	DP-01	Next Review Date	18/09/19
Original date	18/09/18	Approved By	N Babb / I Zulyte
Revision Status and Date	01, 18/09/19	Date of Approval	18/09/18
Revision Log			