

# i2s Data Privacy Policy

## 1 Introduction

This paper describes how data collected from clients of the Innovate to Succeed programme (i2s) will be gathered and used.

Data confidentiality is discussed with the client at an early stage, before submission of an application to the i2s programme. This describes what information (a) we must collect and disclose to fulfil the requirements of the funding bodies, (b) we need to deliver the right support and (c) ask to share with stakeholders. The aim is for the client to have confidence that the information provided to Oxford Innovation<sup>1</sup> is stored securely and will only be used for purposes that the client is aware of and has agreed to.

As part of the acceptance process onto the programme, the client is asked to confirm in writing that he/she has read this data privacy policy and agrees to how data could be used.

## 2 Why is company data collected?

We use information provided for administration, delivery, reporting, marketing and research purposes. We use it for:

1. Mandatory purposes
  - Assessment of eligibility and suitability of the client for the i2s programme
  - Evaluation of the client’s ability to harness innovation capability to deliver growth plans
  - Design of bespoke packages of support
  - Generation of anonymised evaluation data describing the uptake and impact of the i2s programme
  - Evaluation, compliance and publicity by funding organisations
2. Optional purposes
  - Generation of i2s publicity, including case studies and news items
  - Analysis, follow-up and publicity by key stakeholders
  - Referrals to complementary support services
  - To provide information on products or services that a client requests from us or which we feel may be of interest, where the client has consented to be contacted for such purposes.
  - i2s team training

The client has the right to deny permission for us to use data for anything other than the mandatory purposes.

## 3 What client data is collected?

Most of the client data is collected by the i2s application form. This includes

- General company information
- Services and sectors
- Eligibility– turnover, employee numbers, ownership, etc
- Details of previous State Aid received

<sup>1</sup> Throughout this document Oxford Innovation, OI, OIS and any other forms refer to Oxford Innovation Services Ltd. We are registered with the Information Commissioner’s Office as a data controller, as required by the Data Security Act of 1998. Registration number ZA019245.

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- Diversity and equality profile

OIS may also collect information that is publicly available, such as from Companies House.

Client information may also be captured in other i2s client documents including GROWTHmapper™ questionnaires, client case file, action plan, meeting records and reports produced by the Innovation Advisor. OIS may record any other information a client chooses to share, either electronically, verbally, in written form or face to face.

#### 4 How is data stored?

We treat information security very seriously. We will take all reasonable technical and operational precautions to prevent the loss, misuse or alteration of client information. Any data provided by you is:

- Held on our secure, internal servers, and managed by a datacentre supplier who is certified to meet the requirements of ISO 27001 Information Security Management.
- Not transferred outside of the European Economic Area.
- Held in accordance with our Information Security policies.

#### 5 How could data be disclosed?

Below is a table showing how data may be disclosed. Clients will be notified of any changes or additional requests from other stakeholders. If the request is not for a mandatory purpose, clients can instruct i2s not to share their data.

A = mandatory B = optional C = not shared	i2s Team Members <sup>2</sup>	Funding organisations <sup>3</sup>	EM3 LEP and Growth Hub <sup>4</sup>	Other business support partners <sup>5</sup>	Other i2s partners <sup>6</sup>	Oxford Innovation <sup>7</sup>
<b>Application form data</b>	A	A	B	B	B	B
<b>GROWTHmapper Advisor report</b>	A	C	C	C	C	C
<b>GROWTHmapper Client report*</b>	A	C	B	C	C	C
<b>Internal i2s documents</b>	A	C	C	C	C	B
<b>PR material</b>	B	B	B	B	B	B

\* Data collected and reports generated as part of the GROWTHmapper exercise will not be shared by Oxford Innovation to any third parties. That does not prevent the client from sharing their GROWTHmapper report, such as to a nominated EM3 Growth Champion or external advisor.

We may also disclose your personal information to third parties:

- If Oxford Innovation Services is acquired by a third party, in which case personal data held by us about you will be one of the transferred assets

<sup>2</sup> This group comprises OI employees involved in or supporting delivery of EM3 i2s and the [EEN](#) programme

<sup>3</sup> Innovate UK, Department for Communities and Local Government, European Commission

<sup>4</sup> EM3 LEP is the key stakeholder for i2s. A Growth Champion from the [EM3 Growth Hub](#) is allocated to each i2s client to assist with identifying complementary support and resources.

<sup>5</sup> Organisations providing business support locally and nationally, including Business South, Chambers of Commerce

<sup>6</sup> Partner organisations delivering i2s in other LEP areas

<sup>7</sup> Other parts of Oxford Innovation Services Ltd, Oxford Innovation Ltd and SQW Ltd.

- To the extent that we are required to do so by law
- In connection with any ongoing or prospective legal proceedings
- To establish, exercise or defend our legal rights.

We will not disclose personal information to other third parties without a client’s consent.

No data transmission over the internet or any other network can be guaranteed as 100% secure, but we take appropriate steps to try to protect the security of personal data. Data moved or shared outside the organisation will be protected and passwords sent separately.

## 6 Client rights

### 6.1 Accessing your data

The Data Protection Act gives you the right to access information held about you. Your right of access can be exercised in accordance with the Act. Any access request may be subject to a fee of £10 to meet our costs in providing you with details of the information we hold about you. We will require proof of identity with any request made.

You may instruct us at any time not to use your personal information for marketing purposes. In practice, you would typically agree or disagree to this in advance when submitting or updating your personal information, though opportunities to opt out are written into our processes.

### 6.2 Updating your data

We seek to verify and confirm the accuracy of the information that we hold about you every time we interact with you. Please let us know at any time if the information we hold about you needs updating or correcting.

## 7 Roles and responsibilities

The i2s Team Leader is the nominated Data Controller for the i2s programme. The Data Controller maintains and updates this Data Privacy Policy and checks compliance by i2s team members. The Data Controller is the first point of contact for any queries or complaints from clients regarding the use of their data and he/she will take appropriate action to try to resolve them.

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## 8 Document history

Version	Date	Reason for release/version update	Issued by
V1	23 June 2016	First issue	Elaine Kearney
V2	27 July 2017	Annual review and updated requirements from Innovate UK or transferring data outside the organisation	Elaine Kearney