

## Privacy notice

### Optivo (Increase VS project)

#### Identity and contact details of Controller(s)

Optivo is a Housing Association and is a controller of personal information for the purposes of the General Data Protection Regulation ('GDPR')<sup>1</sup> and Data Protection Act 2018. Our contact details for data protection purposes are as follows:

Head of Data Protection and Compliance  
Optivo  
Governance Department  
Grosvenor House  
Croydon  
CR0 9XP

Email: [dataprotection@optivo.org.uk](mailto:dataprotection@optivo.org.uk)

Optivo is registered with the Information Commissioners Office as a Data Controller. Our registration number is **ZA255102**

**Enjoy Training Ltd is a business training company and is a controller of personal information for the purposes of the General Data Protection Regulation ('GDPR')<sup>[1]</sup> and Data Protection Act 2018. Our contact details for data protection purposes are as follows:**

Head of Data Protection and Compliance  
Enjoy Training Ltd  
Suite 9 Market House  
21 Market Place  
Wokingham  
RG40 1AP

Email: [dataprotection@popupbusinessschool.co.uk](mailto:dataprotection@popupbusinessschool.co.uk)

**Enjoy Training Ltd is registered with the Information Commissioners Office as a Data Controller. Our registration number is ZA444693**

Under the GDPR Optivo and Enjoy Training Ltd. (trading as Popup Business School) has a legal duty to protect any information we collect from you or have about you from other sources.

The GDPR has a set of rules and guidelines we must follow when handling your

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<sup>1</sup> By this we mean the Regulation as supplemented and amended by the Data Protection Act 2018.

information. These are referred to as Data Protection Principles.

## **How we use and store your personal information**

This privacy notice tells you what to expect when Optivo or Enjoy Training Ltd. collects and stores personal and sensitive personal information. It tells you the purposes for which we may process your personal information and the legal basis for the processing ('processing' includes us keeping your personal information).

### **1. What and who is Increase VS?**

Increase VS is a training and enterprise project part funded by the European Development Fund and delivered by Optivo, in partnership with:

- University of East Anglia
- Pas-de-Calais habitat
- Clarion Housing Group
- Swaythling Housing Society Limited (trading as Radian)
- Neotoa Housing
- Archipel Habitat
  
- SOCIETE ANONYME D'HABITATIONS A LOYER MODERE  
LOGEMENT ET GESTION IMMOBILIERE POUR LA REGION  
PARISIENNE-LOGIREP
- MAISON DE L'EMPLOI, DE L'INSERTION ET DE LA FORMATION  
DU BASSIN D'EMPLOI DE RENNES
- Impact Network

Each of the above named delivery partners are registered independently with the Information Commissioner on the register of data controllers. Further details can be found here:

<https://ico.org.uk/about-the-ico/what-we-do/register-of-data-controllers/>

Optivo delivery of Increase VS project involves joint data collection with our procured training providers Popup Business School. They act as joint data controllers in this respect and will handle all data in a secure shared system with Optivo only. They are registered independently with the Information Commissioner on the register of data controllers. Further information can be found in the same way.

### **2. Project Participants**

During your participation on the Increase VS programme Optivo and Popup Business School will collect and process information about you.

We do this to:

- Share information with other agencies where we have your agreement
- Conduct transactional surveys in order to monitor and improve our services
- Deliver support for special needs to you
- Monitor Equality and Diversity
- Provide information about additional services we offer, including opportunities to participate in training and events

Unless we advise you otherwise, we'll only collect and process personal information to carry out these functions.

Personal information is stored on our computer systems only shared between contracted training provider and Optivo and / or a participant file.

It is held securely using secure CRM systems and Eventbrite booking system and we have security measures in place to protect it. Optivo records all telephone calls received through our Customer Contact Centre. Recordings are kept for six months.

### **3. Legal basis for processing**

We have three main legal bases for processing personal data of service users

1. Where it is necessary for the performance of a contract (provision of services set out in the tenancy agreement)
2. Where it is necessary for the purposes of the legitimate interests pursued by Optivo, Enjoy Training Ltd. or by a third party to process your information. We can do that so long as we do not interfere with your fundamental rights or freedoms.
3. Because we have your consent (i.e. agreement) to us processing your personal information. You can withdraw your consent at any time. This is explained further below in the section entitled 'Your rights under GDPR'.

The other reasons we can rely upon to process your personal information under GDPR is as follows:

- Where we are under a legal obligation or an obligation under a contract to process/disclose the information
- Where we need to protect the vital interests (i.e. the health and safety) of you or another person.

Some personal information is treated as more sensitive (specifically: health, sexuality, racial or ethnic background, political opinions, religious beliefs, trade union membership or genetic and biometric data). The legal basis for processing these special categories of personal information is more limited. To lawfully process special categories of personal data, we must identify a lawful basis for the processing and meet a separate condition for the processing. The basis we can use are:

- With your consent
- Where we need to protect the vital interests (i.e. the health and safety) of you or another person
- Where you have already made your personal information public
- Where we or another person needs to bring or defend legal claims; and/or
- Substantial public interest grounds

To process personal data about criminal convictions or offences, we must have both a lawful basis for the processing and either legal authority or official authority for the processing.

### **4. How we manage your personal information**

We process your personal information in accordance with the principles of GDPR.

We will treat your personal information fairly and lawfully and we will ensure that information is:

- Processed for limited purposes;
- Kept up-to-date, accurate, relevant and not excessive;
- Not kept longer than is necessary;

- Kept secure.

Access to personal information is restricted to authorised individuals on a strictly need to know basis.

We are committed to keeping your personal details up to date, and we encourage you to inform us about any changes needed to ensure your details are accurate.

To help us to ensure confidentiality of your personal information we may ask you security questions to confirm your identity when you call us. We will not discuss your personal information with anyone other than you, unless you have given us prior written authorisation to do so.

## **5. Who might we share your personal information with?**

Normally, only Optivo or Popup Business School staff will be able to see and process your personal information. However, there may be times when we will need to share personal information with third parties for the purposes as outlined or where we are legally required to do so. When sharing personal information, we will comply with all aspects of the GDPR. Special categories of personal data about health, sexual life, race, religion and criminal activity for example is subject to particularly stringent security and confidentiality measures.

We also share information:

- To allow us to tailor our services to you
- To help us communicate with you (e.g. we sometimes use external printers, translators etc.)
- To assist the Police in solving crime and investigating anti-social behaviour.

We'll never sell personal information to a third party.

## **6. How long do you keep information?**

We have a document retention schedule which sets out how long we keep different types of information for. We follow legal requirements and best practice.

Please contact u Optivo or Enjoy Training Ltd. if you'd like a copy of the schedule.

## **7. Your rights under the GDPR**

You have a number of rights under the GDPR:

### **Access to personal information**

Under the GDPR, you have a right to ask us what personal information we hold about you, and to request a copy of your information. This is known as a 'subject access request' (SAR).

We've a Subject Access Request form which provides further information to help you to submit your request. We will also request two forms of identification.

To request a copy of the form please email us or phone us on 0800 121 60 60.

We will respond to your request with all the information we're legally required to provide within 28 days.

Your right to certain information may be restricted. For example, information relating to a third person or information relating to a police investigation.

### **Rectification**

If you need us to correct any mistakes contained in the information we hold about you, you can let us know by contacting customer services at 0800 121 60 60.

### **Erasure ('right to be forgotten')**

You have the right to ask us to delete personal information we hold about you. You can do this where:

- the information is no longer necessary in relation to the purpose for which we originally collected/processed it
- where you withdraw consent
- where you object to the processing and there is no overriding legitimate interest for us continuing the processing
- where we unlawfully processed the information
- the personal information has to be erased in order to comply with a legal obligation

We can refuse to erase your personal information where the personal information is processed for the following reasons:

- to exercise the right of freedom of expression and information;
- to enable functions designed to protect the public to be achieved e.g. government or regulatory functions
- to comply with a legal obligation or for the performance of a public interest task or exercise of official authority;
- for public health purposes in the public interest;
- archiving purposes in the public interest, scientific research historical research or statistical purposes;
- the exercise or defence of legal claims; or
- where we have an overriding legitimate interest for continuing with the processing

### **Restriction on processing**

You have the right to require us to stop processing your personal information. When processing is restricted, we are allowed to store the information, but not do anything with it. You can do this where:

- You challenge the accuracy of the information (we must restrict processing until we have verified its accuracy)

- You challenge whether we have a legitimate interest in using the information
- If the processing is a breach of the GDPR or otherwise unlawful
- If we no longer need the personal data but you need the information to establish, exercise or defend a legal claim.

If we have disclosed your personal information to third parties, we must inform them about the restriction on processing, unless it is impossible or involves disproportionate effort to do so.

We must inform you when we decide to remove the restriction giving the reasons why.

### **Objection to processing**

You have the right to object to processing where we say it is in our legitimate business interests. We must stop using the information unless we can show there is a compelling legitimate reason for the processing, which override your interests and rights or the processing is necessary for us or someone else to bring or defend legal claims.

### **Withdrawal of consent**

If the basis on which we are using your personal information is your consent. We will seek your consent to contact you for non-essential services. Examples of this include marketing information about our services, community development activities or employment support. You have the right to withdraw your consent to us processing your information at any time. We must stop using the information. We can refuse if we can rely on another reason to process the information such as our contractual obligations or legitimate interests.

### **Transferring information outside the EU**

We may transfer limited personal information to be held on servers in the US as part of contractual arrangements with third party suppliers, in order to fulfil our legal basis for processing as set out above.

Transfers will only be authorised by Optivo where the European Commission has decided the US ensures an adequate level of protection under the Privacy Shield arrangement. We will not authorise the storing of sensitive personal information outside the EU.

### **Changes to this privacy notice**

We keep our privacy notice under regular review. We'll update if we undertake any new or amended processing. This privacy notice was last updated on 23/07/18

### **Further Information**

This privacy notice does not provide detail on all aspects of Popup Business School or Optivo's collection and use of personal information. We're happy to provide any further information or explanation needed.

Please contact us using the information below.

### **How to contact us**

If you want to get in touch you can do so online or on the phone - [click here to find out how you can contact us.](#)

Write to us at:

Head of Data Protection and Compliance  
Optivo  
Governance Department  
Grosvenor House  
Croydon  
CR0 9XP

OR

**Head of Data Protection and Compliance**  
**Enjoy Training Ltd**  
**Suite 9 Market House**  
**21 Market Place**  
**Wokingham**  
**RG40 1AP**

### **Complaints**

Optivo tries to meet the highest standards when collecting and using personal information. We take any complaints we receive seriously. We encourage people to bring it to our attention if they think that our collection or use of information is unfair, misleading, inaccurate or inappropriate.

If you remain unhappy with our response you've the right to complain to the Information Commissioners Office by writing to:

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