

## Strategic University Steel Technology and Innovation Network (SUSTAIN) – Privacy Policy

January 2024

### SUSTAIN Future Steel Manufacturing Research Hub: Using Your Personal Information

Personal information which you supply to us will be held by the SUSTAIN Future Steel Manufacturing Research Hub, (“SUSTAIN”, “SUSTAIN Hub”, “we”, “us”, “our”) an operation funded by the Engineering and Physical Sciences Research Council (EPSRC) and operating across the UK. SUSTAIN is led by Swansea University in partnership with the University of Sheffield and the Warwick Manufacturing Group at the University of Warwick.

SUSTAIN is committed to protecting the rights of registered users in line with Data Protection legislation. For data SUSTAIN requires, Swansea University is the Data Controller and is committed to protecting the rights of individuals in line with the Data Protection Act 2018 and the General Data Protection Regulation (UK GDPR). The Data Protection Officer for Swansea University can be contacted through [dataprotection@swansea.ac.uk](mailto:dataprotection@swansea.ac.uk).

A small subset of the data collected may be sent to EPSRC for reporting and evaluation purposes. Where such information is required by EPSRC, Swansea University is the data processor and EPSRC is the data controller.

This document provides an explanation of why we collect personal data as part of SUSTAIN, how we process it and the steps we take to ensure data security at all stages. All data collected through the operation is processed and stored in accordance with Data Protection legislation.

### What personal information do we collect?

In the interests of providing academics, researchers, industry and wider communities across the UK with opportunities to benefit from the work undertaken as part of the Hub’s research program and facilities by hearing about our research activities and events, opportunities to apply to funding calls, or to keep in touch with those with whom we have collaborated, the following information may be collected stored and used, or otherwise processed by SUSTAIN, in addition to any technical or business information you disclose to us.

- Name and contact details of individuals who make enquiries to SUSTAIN via telephone, email or the website “Contact Us” page and/or who self-register for events and/or newsletters;
- Name and contact details of named individuals within organisations with whom we make contact by telephone, email or post where appropriate;
- Name of organisation lead contact/ technical officers/ employees involved in the support/collaboration/contract;
- Work contact details of personnel involved in the support/collaboration/contract;
- Job role/title of personnel involved in the support/collaboration/contract;
- Contact details for colleagues and assistants to key staff;
- Information about an individual’s engagement with the university such as attendance at events and workshops, collaborative activity and research, consultancy, and consent forms for school engagement activities etc;

Sponsored by:

Academic Partners:



- Health information such as dietary or accessibility requirements;
- Photographs at our support/promotional events;
- Photographs and video footage taken during SUSTAIN events. Delegates will be informed when photographs and/or video footage are taken during events

### **Why do we collect personal information and how do we use it?**

1. To evaluate eligibility for SUSTAIN support according to funding compliance requirements and the operation's approval process, thus ensuring effective value for money and selection of those enterprises with potential to achieve maximum impact;
2. 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;
3. To keep in touch and provide optimal support, informing you on SUSTAIN news, events and highlights that could benefit you or your enterprise and promoting the operation and its world-class research and facilities; and
4. To statistically analyse the commercial relationships existing across Swansea University on a periodic basis.

On occasion, you might supply us with sensitive personal information when attending one of our events (e.g. accessibility or dietary needs), such personal information will be used only for this intended purpose and will be disposed of at the earliest opportunity. At our events we will usually have a photographer present taking general photographs used to promote the event, or if you have applied to be involved in formal activity of the event e.g. a competition/speaker we will usually take photographs of the presentation. We will provide opportunities to opt out of close up photographs at events.

### **What is our legal basis for processing your personal data?**

We are using this information about you because there is a legitimate interest for us to process your data to provide you with direct marketing, including information relating to opportunities for support, up-to-date news and up and coming events of interest (Article 6(1)(f) of the UK GDPR).

A legitimate interests' assessment has been carried out to ensure your personal data is used appropriately and in ways you would reasonably expect with minimal privacy impact. You have the right to object to processing for the purposes of direct marketing if you wish and will always be given the opportunity to unsubscribe from future communications.

Where an image constitutes personal data/special category data, we will always seek the data subject's consent for its use under Article 6(1)(a) and 9(2)(a) of the UK GDPR. We will only process special categories of data, for example, dietary needs collected at events, with your explicit consent.

### **Who receives your personal information?**

Your personal information will be stored on our secure electronic systems and databases and will be shared with relevant colleagues in SUSTAIN to provide you services and guidance. Personal information is protected and will not be disclosed to third parties without consent except when necessary as part of our contractual obligations e.g. to project funders or partners of the project supporting your interaction with us. For example, SUSTAIN is funded by EPSRC so your information



may be shared with those funders as a condition of our grant. Information is made available to persons or organisations requiring access for the reasons outlined above. These include:

- SUSTAIN’s academic, technical and administrative staff;
- University operation governance and management boards;
- External funders and partners/advisors directly involved with your collaboration with SUSTAIN;
- Third party data processors, acting on behalf of SUSTAIN or our external funders and partners/advisors who may contact you directly in order to gather information to enable the evaluation process;

Any disclosures made will be in accordance with Data Protection Legislation and your interests will be considered.

### **How your personal information is stored**

Data Protection legislation requires us to keep your information secure. This means that your confidentiality will be respected, and all appropriate measures will be taken to prevent unauthorised access and disclosure. Only members of staff who need access to relevant parts or all of your information will be authorised to do so. Information about you in electronic form will be subject to password and other security restrictions, while paper files will be stored in secure areas with controlled access.

### **How long will your information be held?**

We will hold the personal data you provide to us no longer than is necessary from the original purpose of collection and will delete data in line with Swansea University’s Data Retention policy in compliance with our legal obligations. A portion of the data will be held for the duration of the SUSTAIN Hub operation and for a reasonable period of time upon its conclusion to comply with regulatory audit and document retention requirements.

### **What are your rights?**

You have a right to access your personal information, to object to the processing of your personal information, to rectify, to erase, to restrict and to port your personal information (please note, however, that exercising these rights may compromise our ability to collaborate due to the operation’s contractual funding constraints). In the case of direct marketing, you have an absolute right to object to processing for this purpose. Please visit the [Swansea University Data Protection webpages](#) for further information in relation to your rights.

Any requests or objections should be made in writing to the Data Protection Officer at the University leading your project:

Swansea University	University Compliance Officer (FOI/DP), ISS, Swansea University, Singleton Park, Swansea, SA2 8PP Email: <a href="mailto:dataprotection@swansea.ac.uk">dataprotection@swansea.ac.uk</a>
University of Sheffield	Head of Data Protection and Legal Services, University Secretary's Office, University of Sheffield, Western Bank, Sheffield, S10 2TN Email: <a href="mailto:dataprotection@sheffield.ac.uk">dataprotection@sheffield.ac.uk</a>



University of Warwick	Information and Data Compliance Team, University House, University of Warwick, Coventry, CV4 8UW Email: <a href="mailto:infocompliance@warwick.ac.uk">infocompliance@warwick.ac.uk</a>
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If you are unhappy with the way in which your personal information has been processed, you may in the first instance contact the University Data Protection Officer using the contact details above. If you remain dissatisfied, then you have the right to apply directly to the Information Commissioner for a decision. The Information Commissioner can be contacted at:

Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF  
[www.ico.org.uk](http://www.ico.org.uk)

### **Your responsibilities**

Please advise of any changes to your name, address, contact details as soon as practically possible so that we can amend our records accordingly.

### **Changes to our Privacy Policy**

Any changes we make to our privacy policy in the future will be posted on this page and where appropriate, notified to you by email. Please check back frequently to see any updates or changes to our privacy policy.

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Swansea University is a designated public authority for the purposes of the Freedom of Information Act 2000 and Environmental Information Regulations 2004 and is therefore subject to receiving requests for recorded information. Freedom of Information or Environmental Information requests will be responded to in line with the provisions of the relevant legislation.