



Engage MAT Employee Privacy Notice

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1. The purpose of this document

The Engage Trust is the "data controller" for the personal information held. This means that we are responsible for deciding how we “process” (that is, collect, hold, use and disclose) your personal information. Our address is The Engage Trust, Drayton Old Lodge, 146 Drayton High Road, Norwich, Norfolk NR 8 6AN.

The Engage Trust is committed to protecting the privacy and security of your personal information. By personal information, we mean information which, by itself or with other data available to the Engage Trust, can be used to identify you.

The General Data Protection Regulations (GDPR) amend the Data Protection Act 1998 as from the 25th May 2018 and this privacy notice has been produced in compliance with the GDPR.

This privacy notice:

- sets out how we look after your personal information
- describes how we collect, use and share your personal information and
- tells you about your privacy rights and how the law protects you.

This notice applies to current and former employees, including employees on zero hours or flexible contracts and casual workers. This notice does not form part of your contract of employment or contract to provide services. Where specified this notice also applies to agency workers, contractors, interims etc.

Other workers including agency workers, office holders, interims or contractors are also covered by this notice. The personal information that is held and how it is processed is highlighted in the relevant sections of this notice.

We will ensure that your personal information is handled in accordance with our data protection obligations. Your information will be:

- Used lawfully, fairly and in a transparent way
- Collected only for valid purposes that we have explained to you and not used in any way that is incompatible with those purposes
- Relevant to the purposes we have told you about and limited only to those purposes.
- Accurate and kept up to date
- Kept only as long as is necessary for the purposes we have told you about
- Kept securely

2. How the law protects you and the legal basis for processing your information

The GDPR says that we must have a lawful basis for processing personal information. Our lawful basis for doing so will include where the processing is necessary:

- To perform the contract of employment or other contractual arrangement we have with you
- To comply with a legal duty or to perform of a task of function carried out in the public interest.
- When you consent to it.

Further details are provided in the schedule in paragraph 3 below.

"Special category data" under the GDPR is particularly sensitive personal information require higher levels of protection. For example, information about an individual's:

- race
- ethnic origin
- politics
- religion
- trade union membership
- genetics
- biometrics (where used for ID purposes)
- health
- sex life
- sexual orientation

Information about any criminal convictions is also given a similarly higher level of protection under the GDPR.

We need to have further justification for collecting, storing and using this type of personal information. We may process special categories of personal information, and information relating to criminal convictions, in the following circumstances:

- Where we need to carry out our legal obligations or exercise rights in relation to your employment with us. We will have in place an appropriate policy document and safeguards which we are required by law to maintain when processing such data.
- Where it is in the substantial public interest to do so, and it is necessary for the administration of justice or a statutory function of the Trust.
- Where it is necessary for under other grounds authorised by law, including the prevention or detection of unlawful acts or protecting the public against dishonesty. In these circumstances, the information would only be processed where it is in the substantial public interest to do so and where it must be carried out without your consent so as not to prejudice these purposes.
- Where it is needed in the substantial public interest, such as for equal opportunities monitoring. This is subject to a number of safeguards, including your right to give notice that you do not want your data to be used in this way. We will explain this right further to you at the time this information is collected.
- In limited circumstances in relation to our occupational pension scheme. This will only be where we cannot reasonably be expected to obtain your consent and we are not aware of you deciding to withhold your consent. We have in place an appropriate policy document and safeguards which we are required by law to maintain when processing such data.
- Where it is in the substantial public interest and is necessary for the safeguarding of children and individuals at risk subject to safeguards and conditions set out in paragraph 18 schedule 1 of the Data Protection Bill.
- In some cases, with your explicit written consent. We do not need your consent if we use special category information, including in relation to any criminal convictions, where it is necessary in accordance with one of the grounds set out above. However, in limited circumstances, we may approach you for your written consent to allow us to process certain particularly sensitive data. If we do so, we will provide you with full details of the information that we would like and the reason we need it, so that you can carefully consider whether you wish to consent. You should be aware that it is not a condition of your contract with us that you agree to any request for consent from us.

We process information relating to criminal convictions where the law allows us to do so. This will usually be where such processing is necessary to carry out our obligations and provided we do so in line with our [Convictions – Employing People with Criminal Convictions Policy P112b](#).

Less commonly, data protection legislation also allows us in limited circumstances to use any information we hold that is special category data or data relating to criminal convictions for other purposes that are set out in Schedule 2 of the Data Protection Act 2018. These include in certain cases, and subject to safeguards, where it is necessary in relation to legal claims, in certain circumstances where it is necessary to protect your interests (or someone else's interests) and you are not capable of giving your consent, or where you have already made the information public.

Please note we will only collect information about criminal convictions if it is appropriate given the nature of the role and where we are legally able to do so. Where appropriate, we will collect information about criminal convictions as part of the recruitment process or we

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may be notified of such information directly by you or by the police while you are working for us. We will use information about criminal convictions and offences to assess your suitability for continuing employment in your post.

We will use your particularly sensitive personal information in the following ways:

- Information relating to leaves of absence, which may include sickness absence or family related leaves, to comply with employment and other laws.
- We will use information about your physical or mental health, or disability status, to ensure your health and safety in the workplace, to assess your fitness to work, to provide appropriate workplace adjustments, to monitor and manage sickness absence and to administer the occupational sick pay scheme.
- We will use information about your race or national or ethnic origin, religious, beliefs, or your sexual orientation, to ensure meaningful equal opportunity monitoring and reporting, or to provide support and guidance to you e.g. right to work status.

Further details are provided in the schedule in paragraphs 3 and 4 below.

3. What we use your personal information for and the legal basis

The use of your information and the legal basis for processing is set out below. This applies to all staff except agency workers, contractors, interims etc. In the case of these workers, we use your information for the purposes marked: *

What we use your personal information for	The legal basis for processing personal data under Art 6	The legal basis for processing special categories data and data relating to criminal convictions under Article 9
Deciding to appoint you to a job*	Processing is necessary for the performance of a task carried out in the public interest – Section 111 of the Local Government Act 1972	Processing is necessary in respect of employment obligations
Determining the terms on which you are employed*	Processing is necessary for the performance of a task carried out in the public interest – Section 111 of the Local Government Act 1972	Processing is necessary in respect of employment obligations.
Checking you are legally entitled to work in the UK*	Processing is necessary for the performance of a task carried out in the public interest - Legal duty under the Asylum and Immigration Act 2006 to prevent illegal working by carrying out document checks to confirm if a person has the right to work in the UK.	Substantial public interest ground - Legal duty under the Asylum and Immigration Act 2006 to prevent illegal working by carrying out document checks to confirm if a person has the right to work in the UK.
Checking you are legally entitled to	Processing is necessary for the performance of a task carried	Substantial public interest ground - Legal duty under the

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work with children or vulnerable adults*	out in the public interest - Legal duty under the Safeguarding Vulnerable Groups Act 2006 to undergo a vetting process for all individuals working with children and vulnerable adults.	Safeguarding Vulnerable Groups Act 2006 to undergo a vetting process for all individuals working with children and vulnerable adults.
Paying you, and making tax and NI deductions as required by HMRC (also workers paid by NCC under IR35)	<p>Processing is necessary for the performance of a task carried out in the public interest - Legal duty to ensure employees are paid under the Employment Rights Act 2002.</p> <p>Processing is necessary for the performance of a task carried out in the public interest - Legal duty to ensure employees and employers pay the correct income tax and National Insurance Contributions (NICs) under the following legislation Income Tax (PAYE) Regulations 2003 National Insurance Contributions and Statutory Payments Act 2004</p>	<p>Substantial public interest ground - Legal duty to ensure employees are paid under the Employment Rights Act 2002.</p> <p>Legal duty to ensure employees and employers pay the correct income tax and National Insurance Contributions (NICs) under the following legislation Income Tax (PAYE) Regulations 2003 National Insurance Contributions and Statutory Payments Act 2004</p>
Process timesheets or invoices to enable payment for work undertaken to be made (Non-employees only)	To fulfil the contract for services with you	To fulfil the contract for services with you
Statutory reporting to HMRC*	Processing is necessary for the performance of a task carried out in the public interest - Legal duty to inform HMRC of payments made under Income Tax (PAYE) Regulations 2003	Substantial public interest ground - Legal duty to inform HMRC of payments made under Income Tax (PAYE) Regulations 2003
Statutory payments and deductions – e.g. Statutory Sick Pay, Statutory Maternity Pay etc.	Processing is necessary for the performance of a task carried out in the public interest - Legal duty to ensure employees receive the correct statutory payments under the following legislation The Statutory Shared Parental Pay (General) Regulations 2014 The Statutory Maternity Pay (General) Regulations 1986	Substantial public interest ground - Legal duty to ensure employees receive the correct statutory payments under the following legislation The Statutory Shared Parental Pay (General) Regulations 2014 The Statutory Maternity Pay (General) Regulations 1986 The Statutory Paternity Pay and Statutory Adoption

	The Statutory Paternity Pay and Statutory Adoption Pay(General) Regulations 2002 Employment Rights Act 2002	Pay(General) Regulations 2002 Employment Rights Act 2002
Liaising with the relevant Pensions provider	Processing is necessary for the performance of a task carried out in the public interest - Legal duty under the Pensions Act 2008 to provide a workplace pension and manage employer and employee contributions.	
Updating your employment record to reflect changes to your contract	To fulfil the contract of employment with you	Processing is necessary in respect of employment obligations.
Employee benefit scheme that you have signed up for	To fulfil the contract, you have entered into with the service provider by confirming your continuing employment with ET	Not applicable
Awarding incremental progression	To fulfil the contract of employment with you	Not applicable
Employee liability information in advance of a TUPE transfer	Processing is necessary for the performance of a task carried out in the public interest - Legal duty under the Transfer of Undertakings Regulations 2006, the outgoing employer must provide information about the identities and employment of the transferring employees.	Substantial public interest ground – Legal duty under the Transfer of Undertakings Regulations 2006, the outgoing employer must provide information about the identities and employment of the transferring employees.
Reviewing performance, managing performance and objective setting	To fulfil the contract of employment with you	Processing is necessary in respect of employment obligations.
Gathering evidence about grievance, disciplinary or other capability investigation	To fulfil the contract of employment with you	Processing is necessary in respect of employment obligations.
Making decisions about your continued employment or engagement	Processing is necessary for the performance of a task carried out in the public interest - Legal duty (if barred from working with vulnerable groups), to fulfil the contract of employment with you	Substantial public interest ground – Legal duty (if barred from working with vulnerable groups) Processing is necessary in respect of employment obligations.
Making arrangements for the termination of your employment or engagement	Processing is necessary for the performance of a task carried out in the public interest - Legal duty (if barred from working with	Substantial public interest ground –

	vulnerable groups), to fulfil the contract of employment with you	Legal duty (if barred from working with vulnerable groups) Processing is necessary in respect of employment obligations.
Dealing with legal disputes involving you or other employees, workers and contractors including accidents at work	To fulfil the contract of employment with you	Processing is necessary in respect of employment obligations.
Ascertaining your fitness to work	Processing is necessary for the performance of a task carried out in the public interest - Legal duty under Health and Safety legislation and to fulfil the contract of employment with you.	Substantial public interest ground – Legal duty under Health and Safety legislation Processing is necessary in respect of employment obligations.
Managing sickness absence	To fulfil the contract of employment with you	
Identifying and implementing adjustments	Processing is necessary for the performance of a task carried out in the public interest - Legal duty under the Equalities Act 2010 to implement any reasonable adjustments	Substantial public interest ground - Legal duty under Health and Safety legislation
Complying with health and safety obligations	Processing is necessary for the performance of a task carried out in the public interest - Legal duty under the Health and Safety at Work Act 1974	Substantial public interest ground - Legal duty under the Health and Safety at Work Act 1974
Workforce planning	Processing is necessary for the performance of a task carried out in the public interest – Section 111 of the Local Government Act 1972	Substantial public interest ground - Section 111 of the Local Government Act 1972
To conduct testing of new payroll functionality or enhancements	Processing is necessary for the performance of a task carried out in the public interest – Section 111 of the Local Government Act 1972	Substantial public interest ground - Section 111 of the Local Government Act 1972
Carry out data analytics to review workforce trends, application of terms and conditions	Processing is necessary for the performance of a task carried out in the public interest – Section 111 of the Local Government Act 1972	Substantial public interest ground - Section 111 of the Local Government Act 1972
Equal opportunities monitoring	Processing is necessary for the performance of a task carried out in the public interest - Legal	Substantial public interest ground -

	duty under the Equalities Act 2010 (Specific Duties) Regulations for Public sector employers to demonstrate compliance with the duty to eliminate discrimination and advance equality of opportunity	Legal duty under the Equalities Act 2010 (Specific Duties) Regulations for Public sector employers to demonstrate compliance with the duty to eliminate discrimination and advance equality of opportunity
Workforce reporting requirements e.g., workforce census, Gender Pay gap reporting*, Trade union facilities time,	Processing is necessary for the performance of a task carried out in the public interest - Legal duty under s83 of the Children Act 1989, Gender Pay Gap Reporting Regulations, Trade Union Act, s2 Local Government, Planning and Land Act 1980	Substantial public interest ground - Legal duty under s83 of the Children Act 1989, Gender Pay Gap Reporting Regulations, Trade Union Act
Monitor use of information and communication systems to ensure compliance with our IT policies	Processing is necessary for the performance of a task carried out in the public interest - Processing is necessary for the performance of a task carried out in the public interest – Section 111 of the Local Government Act 1972	Substantial public interest ground - Section 111 of the Local Government Act 1972
To ensure buildings, network and information security, including preventing unauthorised access to our buildings, computer and electronic communications systems and preventing malicious software distribution*	Processing is necessary for the performance of a task carried out in the public interest - Processing is necessary for the performance of a task carried out in the public interest – Section 111 of the Local Government Act 1972	Substantial public interest ground - Section 111 of the Local Government Act 1972
Health surveillance	Processing is necessary for the performance of a task carried out in the public interest - Health and safety legal responsibility to prevent industrial injury e.g. HAVS	Substantial public interest ground - Section 111 of the Local Government Act 1972
Lone working tracking and vehicle tracking	To fulfil our contract of employment with you. Processing is necessary for the performance of a task carried out in the public interest – Section 111 of the Local Government Act 1972	Substantial public interest ground - Section 111 of the Local Government Act 1972

Prevent fraud	Processing is necessary for the performance of a task carried out in the public interest – Section 111 of the Local Government Act 1972	Substantial public interest ground - Section 111 of the Local Government Act 1972
To support organisational information e.g. phone book, structure charts, first aider	Consent (photo), additional info in phone book. Processing is necessary for the performance of a task carried out in the public interest – Section 111 of the Local Government Act 1972	Substantial public interest ground - Section 111 of the Local Government Act 1972

4. What information do we hold about you?

The information we hold about you applies to all staff except agency workers, contractors, interims etc. In the case of these workers, we use your information for the purposes marked: *

Personal details	Name* Date of birth* Gender Marital/civil partnership status Gender recognition certificate
Contact details	Address* Home phone number* Personal mobile number* Email address Work mobile number
Other kinds of national identifier	National Insurance Number (NINo)* NHS number Police National Computer Number (PNC No.) Biometric residence card number Driving licence Passport
Special category data	Racial or ethnic origin Nationality Diversity declaration form Religious beliefs Union membership deductions Sexual orientation Health data including disabilities Sickness absence Occupational health and MIRS referrals, reports and letters Pre-employment health check outcome Access to work assessments and adjustments recommended and implemented Criminal convictions and offences* Pre-employment declarations DBS

Education	Schools and further / higher education establishments attended Qualifications*
Employment history*	Job(s) Former employers/work history Breaks in employment and reasons for these Professional qualification(s) Professional membership(s) Referees
Current employment	Start date in post Start date with Engage Trust Continuous local government service Employee number/payroll number Name of Department/Service Holiday entitlement Recruitment information including application form Right to work documentation* References* Information included in an application form or CV including supporting statement as part of the recruitment process* Psychometric or other skills tests as part of a recruitment or assessment process Employment records e.g. posts held, change of hours/location/length of contract Working hours (full time or part time) and flexitime records Training or other learning certification and/or records Incident report forms Sickness or other paid absences e.g. maternity, disability leave Parental leave or other unpaid absence Flexible working requests Health and safety information e.g. incident forms, Display Screen equipment assessment Performance development discussion records Disciplinary and grievance records Formal performance management/ capability records
Preferences	Preferred contact method Paper payslips Name "known as"
Financial	Bank details* Salary and payroll information Overpayments Insurance claims Compensation payments Tax code and status P60 PAYE Pension deductions Salary sacrifice deductions Statutory deductions e.g. child support, student loans Give As You Earn
Contractual information	Employment contracts incl written statement of particulars and offer letter

Social Relationships	Marital or civil partnership status Next of Kin Emergency contact
Documentary Data	Passport Immigration status Leave to remain Right to work documentation Certificate of sponsorship and work Visas Birth certificate Evidence of name change e.g. Marriage certificate, deed poll etc.
Consent	Any permissions or consents relating to collecting and processing individual's data Consent for who we might share individual employees' data with
Locational	Contractual location/work base Mobile phone location data Staff remote logging data* Staff lone working data* Corporate credit card use in shops Trackers in vehicles CCTV* Swipe cards entry/exit records* Use of internet data*

5. Who provides this information

We collect personal information through the application, recruitment and on boarding process, either directly from you as an applicant or from the employment agency representing you and from those who carry out DBS checks on our behalf. We also collect information from your previous employer and nominated referees about your suitability for the position you have applied for.

We will collect additional personal information during your employment or engagement with the Engage Trust.

6. Who we share this information with

We may have to share your data with third parties where required by law in accordance with the grounds set out above. The grounds apply to all staff except agency workers, contractors, interims etc. In the case of these workers, we share your data with the third parties marked: *

"Third parties" includes third-party service providers (including contractors and designated agents). The following third-party service providers process personal information about you for the following purposes:

Third party	Purpose for sharing
PAM	Provider of Occupational Health Services
IPRS	Provider of Musculoskeletal rehabilitation services
Validium	Norfolk Support Line employee assistance programme
Step Teachers	Supply staff Agency

Teach	Supply staff Agency
Teaching Personnel	Supply staff Agency
Staff Call	Supply staff Agency
NORSE	Providers of cleaners, caretakers and school meal delivery
Evolve	Trip attendees
Velocity*	Technical support to the HR/Payroll system and infrastructure
HMRC* (workers paid by NCC under IR35)	Tax, NI and statutory payments and deductions
Department for Education, Norfolk Pensions Service, NHS	Pension schemes
GovDelivery	Provider of system to communicate with Wellbeing facilitators

All our third-party service providers and other subsidiaries or parents in the group are required to take appropriate security measures to protect your personal information in line with our policies. We do not allow our third-party service providers to use your personal data for their own purposes. We only permit them to process your personal data for specified purposes and in accordance with our instructions, as identified in separate privacy notices.

We may also be required to share your personal information with other third parties, for example, in the context of a TUPE transfer or public-sector re-organisation.

We may also need to share your personal information with a regulator or government agency to otherwise comply with the law.

We will share your personal information with other entities in our group as part of our regular reporting activities on Trust performance, in the context of a reorganisation or restructuring exercise, for system maintenance support and hosting of data.

7. Data Security

We have put in place measures to protect the security of your information.

Third parties will only process your personal information on our instructions and where they have agreed to treat the information confidentially and to keep it secure.

We have put in place appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal information to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal information on our instructions and they are subject to a duty of confidentiality. Details of these measures may be obtained from Shelley Webb.

We have put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

8. If you choose not to give personal information

We may need to collect personal information by law, or under the terms of a contract we have with you.

If you choose not to give us this personal information, it may delay or prevent us from meeting our obligations. It may also mean that we cannot perform the contract we have entered with you. Any data collection that is optional will be made clear at the point of collection.

9. Change of purpose

We will only use your personal information for the purpose we told you about, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If we need to use your personal information for a reason that is not compatible we will notify you and explain the legal basis allowing us to use the information in this way, unless we are required or permitted by law to do so.

10. How we use your information to make automated decisions

We only make automated decisions about you where we are required to by law, to fulfil our employer obligations under pension's auto-enrolment, where you will be automatically enrolled in the pension scheme based on your age and earnings. Enrolment is reviewed every 3 years and employees may be put back into a scheme at this stage. You may notify us if you do not wish to be a member of the pension scheme. Please refer to HR team for further details.

11. Transferring your personal information to other countries

Your personal information may be transferred outside of the UK and the European Economic Area. While some countries have adequate legal protections for personal data, in other countries steps will be necessary to ensure appropriate safeguards apply to the information. These include imposing contractual obligations to ensure that these safeguards apply.

12. How long will you use my information for?

We will only retain your personal information for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements. Details of retention periods for different aspects of your personal information are available in our retention schedule.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

In some circumstances we may anonymise your personal information so that it can no longer be associated with you, in which case we may use such information without further notice to you. Once you are no longer an employee, worker or contractor of the company

we will retain and securely destroy your personal information in accordance with our data retention policy.

13. Your duty to inform us of changes

It is important that the personal information we hold about you is accurate and current. Please keep us informed if your personal information changes during your working relationship with us.

14. Your rights

You have the following rights (but note, these rights do not apply in all circumstances):

- **Request access** to your personal information (commonly known as a "data subject access request"). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it. Guidance on how to make a subject access request and the request form can be found by referring to our Freedom of Information scheme. You do not have to pay a fee to access your personal information (or to exercise any of the other rights). But we may need to request specific information from you to help us confirm your identity and ensure your right to access the information (or to exercise any of your other rights). This is another appropriate security measure to ensure that personal information is not disclosed to any person who has no right to receive it.
- **Request correction** of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
- **Request erasure** of your personal information. This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing (see below).
- **Object to processing** of your personal information where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground. You also have the right to object where we are processing your personal information for direct marketing purposes.
- **Request the restriction of processing** of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.
- **Request the transfer** of your personal information to another party.

If you want to exercise any of the rights referred to above, please write to operations@engage.norfolk.sch.uk providing details of the right you wish to exercise.

- **Right to withdraw consent:** In the limited circumstances where you may have provided your consent to the processing of your personal information for a specific purpose, you have the right to withdraw your consent for that specific processing at any time.
- **To withdraw your consent**, please contact HR email; Operations@engage.norfolk.sch.uk. Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law.

15. Data Protection Officer – Questions or Complaints

We have appointed a data protection officer (DPO) to oversee compliance with this privacy notice. If you have any questions about this privacy notice or how we handle your personal information, please contact the Data Protection Officer, Shelley Webb by letter to Engage Trust, Drayton Old Lodge, and 146 Drayton High Road Norwich NR8 6AN marked for the attention the Data Protection Officer.

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues. The ICO's address is Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF or by telephone on 0303 123 1113 or online at <https://ico.org.uk/global/contact-us/>

16. Changes to this privacy notice

We reserve the right to update this privacy notice at any time, and we will provide you with a new privacy notice when we make any substantial updates. We may also notify you in other ways from time to time about the processing of your personal information.