



European Union

European Structural
and Investment Funds

1. INTRODUCTION

Community Led Local Development (CLLD) is a £14.606 million contract, joint funded by the European Regional Development Fund (ERDF) with the Ministry for Housing, Communities and Local Government (MHCLG) and the European Social Fund (ESF) with the Department for Work and Pensions (DWP). The Funding Agreement References are Project Number: 05R17L01793 (ERDF) and 05S17L00493, 05S17L00494, 05S17L00495 & 05S17L00496 (ESF). The programme, under these contracts, aims to deliver a programme of community-led interventions including capital and revenue activity in accordance with priorities identified in the four Cornwall Local Development Strategies (LDS). The programme is delivered by Cornwall Development Company (CDC). Cornwall Development Company (CDC) is the arms-length economic development arm of Cornwall Council (CC) and is part of the CORSERV Limited group of companies.

CLLD respects your privacy and is committed to protecting your personal data. This privacy notice will inform you as to how we look after your personal data and tell you about your privacy rights and how the law protects you.

PURPOSE OF THIS PRIVACY NOTICE

This privacy notice aims to give you information on how CLLD collects and processes your personal data, including any data you may provide when you sign up to a newsletter, registering, completion and submission of any application, or are provided support through one of our projects.

This programme is not intended for children and we do not knowingly collect data relating to children.

It is important that you read this privacy notice together with any other privacy notice or fair processing notice we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This privacy notice supplements the other notices and is not intended to override them.

DATA PROTECTION OFFICER and DATA CONTROL OFFICER:

We have appointed a Data Protection Officer (DPO), Richard Zmuda, CORSERV Ltd Group Company Secretary, to oversee compliance with this privacy notice and the data protection legislation in general.

The Data Control Officer (DCO) is Nicky Pooley, CDC. If you have any questions about this privacy notice, or how we handle your personal information, please contact the DCO initially. 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 (www.ico.org.uk). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance

CONTACT DETAILS

Our full details are:

Full name of legal entity: Cornwall Development Company

Name or title of DCO: Nicky Pooley, Head of Corporate Services

Email address: GDPR@cornwalldevelopmentcompany.co.uk

Postal address: Bickford House, Station Road, Pool, Redruth TR15 3QG

CHANGES TO THE PRIVACY NOTICE AND YOUR DUTY TO INFORM US OF CHANGES

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

THIRD-PARTY LINKS

Our website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy notice of every website you visit.

2. THE DATA WE COLLECT ABOUT YOU

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together follows:

- **Identity Data** includes first name, maiden name, last name, username or similar identifier, marital status, title, date of birth, gender and National Insurance number. Any of the following may, where suitable, be used to evidence your eligibility for support and a copy will be retained – Bank statement, benefits information, driving licence, passport, birth certificate, utility bill, Council Tax statement, rent statement, HMRC letter. As part of the ESF delivery we may also collect details of your employment history, and, where a positive result is achieved, details of any further learning or employment gained. This may include your start date, employer name, employer address, job title, hours worked, contract of employment or wage slip.

We may also collect, store and use the following “special categories” of more sensitive personal information:

- Information about your race or ethnicity
- Information about your health, including any medical or health conditions
- Information about whether you have had/have any criminal convictions and offences
- **Contact Data** includes address, email address and telephone numbers.
- **Technical Data** includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access this website.
- **Profile Data** includes your username and password, your interests, preferences, feedback and survey responses.
- **Usage Data** includes information about how you use our website and services.

- **Marketing and Communications Data** includes your preferences in receiving marketing from us and our third parties and your communication preferences.

We may also collect, use and share **Aggregated Data** such as statistical or demographic data for any purpose. Aggregated Data may be derived from your personal data but is not considered personal data in law as this data does **not** directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy notice.

We only collect anonymised **Special Categories of Personal Data** about your company employees confined to ethnicity, age and disability with the option to choose “prefer not to say”. This is a requirement from the contract we have with MHCLG in delivering this programme.

IF YOU FAIL TO PROVIDE PERSONAL DATA

Where we need to collect personal data by law, or under the terms of a contract we have with you and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with goods or services). In this case, we may have to cancel a product or service you have with us but we will notify you if this is the case at the time.

3. HOW IS YOUR PERSONAL DATA COLLECTED?

We use different methods to collect data from and about you including through:

- **Direct interactions.** You may give us your Identity and/or Contact Data by filling in forms (sometimes through a delivery partner) or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:
 - apply for our services;
 - participate in our programme of delivery;
 - create an account on our website;
 - subscribe to our service or publications;
 - request marketing to be sent to you;
 - promotion or survey; or
 - give us some feedback.
- **Automated technologies or interactions.** As you interact with our website, we may automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies and Google Analytics.
- **Google Analytics.** When someone visits this site we use a third party service, Google Analytics, to collect standard internet log information and details of visitor behaviour patterns. We do this to find out things such as the number of visitors to the various parts of the site. This information is only processed in a way which does not identify anyone. We do not make, and do not allow Google to make, any attempt to find out the identities of those visiting our website. For more information on Google Analytics cookies, see the official Google Analytics page.
- **Cookies.** Cookies are small text files that are placed on your computer by websites that you visit. They are widely used in order to make websites work, or work more

efficiently, as well as to provide information to the owners of the site.
Some examples of cookies could be:

- storing information to personalise the website to your chosen requirements
- cookies can be used to record users behaviour on a website, for example to record the pages they have viewed

There are 2 different types of cookie that can be placed in your browser by a website:

- **Session cookies** are only used for the period you use the website, and are deleted when you close your web browser. A new cookie would then be placed in your web browser if you were to visit the same website again in the future
- **Persistent cookies** remain in your browser once you have left the site and closed your web browser. The next time you visit the site the information in the cookie will be used to ensure the website works as set up at the previous visit. For example to display certain things on the homepage. Persistent cookies will expire if the website that set them is not visited again within a certain timescale.
- **Cookies on this website.** We use a number of different cookies on this website and the sub domains and third party systems we run. Examples include:
 - We use a google analytics cookie on our website and all our online systems to record website usage. We do this to find out things such as the number of visitors to the various parts of the site. We collect this information in a way which does not identify anyone, we do not make any attempt to find out the identities of those visiting any of our websites, and we do not share this information with anyone.
 - Account related cookies. If you create an account with us then we will use cookies for the management of the signup process and general administration. These cookies will usually be deleted when you log out however in some cases they may remain afterwards to remember your site preferences when logged out.
 - Email newsletters related cookies. This site offers newsletter or email subscription services and cookies may be used to remember if you are already registered and whether to show certain notifications which might only be valid to subscribed/unsubscribed users.
 - Forms related cookies. When you submit data to through a form such as those found on contact pages or comment forms cookies may be set to remember your user details for future correspondence.
- **More Information - Managing cookies on your PC:** Most web browsers allow some control of most cookies through the browser settings. To find out more about cookies, including how to see what cookies have been set and how to manage and delete them, visit: [the about cookies website](#).
- **Third parties or publicly available sources.** We may receive personal data about you from various third parties in the form of a referral on the basis that you would have already given your consent for this
- You can choose to block the cookies that are set by the CLLD website, however you must be aware that doing so may mean that parts of the site will not work correctly.
- **Changes to the way websites use cookies:** The law that controls how cookies are used on websites has changed. There is more information about cookies on the: [Information Commissioners website](#).

Hopefully the above has clarified things for you and as was previously mentioned if there is something that you aren't sure whether you need or not it's usually safer to leave cookies enabled in case it does interact with one of the features you use on our site

However if you are still looking for more information about the way cookies are used on this site, or how you may be affected please contact our DCO.

4. HOW WE USE YOUR PERSONAL DATA

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Where we need to perform the contract we are about to enter into or have entered into with you.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal or regulatory obligation.

Information you supply using any electronic forms on our website will only be used for the purpose(s) stated on the form.

Information you provide in emails to us will only be used for the purpose (which we reasonably believe) that you give it to us for.

Information you provide us with may be used for statistical research but will not be used in any way (beyond its original purpose) which enables you to be identified.

Generally we do not rely on consent as a legal basis for processing your personal data other than in relation, if applicable, to sending third party direct marketing communications to you via email or text message or for the purposes of providing you with our newsletter. You have the right to withdraw consent to marketing at any time by contacting us at clld@cornwalldevelopmentcompany.co.uk

PURPOSES FOR WHICH WE WILL USE YOUR PERSONAL DATA

We collect, use, hold and share where necessary, information for the following purposes:

- making a decision about the Programme of support you are undertaking
- checking you are legally entitled to work in the UK
- to conduct data analytics studies in support of our contractual obligations. These will involve data collected but will usually be anonymised.
- Equal opportunities monitoring
- to deal with the service that you requested and to allow us to be able to communicate, and provide services appropriate to your needs and to monitor our performance in responding to your request
- to ensure we meet our legal obligations
- to prevent and detect fraud or crime
- to process financial transactions including grants, payments, benefits and invoices involving us or when we are acting on behalf of other government bodies
- to conduct research and surveys and to allow for the statistical analysis of data so we can plan the provision of services
- where necessary to protect individuals from harm or injury
- where you have consented to the processing
- where otherwise permitted under Data Protection legislation

HOW WE USE PARTICULARLY SENSITIVE PERSONAL INFORMATION:

“Special categories” of particularly sensitive personal information requires higher levels of protection. We need to have further justification for collecting, storing and using this type of personal information. We may process special categories of personal information in the following circumstances:

- Where we need to carry out our legal obligations and in line with our data protection policy
- Where it is needed in the public interest, such as for equal opportunities monitoring, and in line with our data protection policy

It applies to information we collect about:

- Service provision;
- Visitors to our websites;
- Use of cookies;
- People who contact us via social media;
- People who call us;
- People who email us;
- People who make a complaint to us;
- Your rights;
- Complaints and queries;
- Disclosure of personal information
- Access to personal information

We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To register you as a new customer	(a) Identity (b) Contact	(a) Performance of a contract with you and in accordance with our contractual requirements with MHCLG & DWP (b) Necessary for our legitimate interests (to study how customers use our products/services, to develop them and grow our business)
If you register for a newsletter	(a) Identity (b) Contact	(a) Performance of a contract with you and in accordance with our contractual requirements with MHCLG & DWP (b) Necessary for our legitimate interests (to study how customers use our products/services, to develop them and grow our business)
To enable you to provide information to complete any application for our services	(a) Identity (b) Contact (c) Profile (d) Personal credit check where a company credit check cannot be obtained (e) Anonymised ethnicity, age and disability	(a) Performance of a contract with you and in accordance with our contractual requirements with MHCLG & DWP (b) Necessary for our legitimate interests (to study how customers use our products/services, to develop them and grow our business)
To manage our relationship with you which will include: (a) Notifying you about changes to our terms or privacy policy (b) Asking you to leave a review or take a survey	(a) Identity (b) Contact (c) Profile (d) Marketing and Communications	(a) Performance of a contract with you and in accordance with our contractual requirements with MHCLG (b) Necessary for our legitimate interests (to study how customers use our products/services, to develop them and grow our business) (b) Necessary to comply with a legal obligation (c) Necessary to comply with a legal obligation
To enable you to complete a survey	(a) Identity (b) Contact	(a) Performance of a contract with you and in accordance with our contractual requirements with MHCLG & DWP

	(c) Profile (d) Usage (e) Marketing and Communications	(b) Necessary for our legitimate interests (to study how customers use our products/services, to develop them and grow our business)
To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	(a) Identity (b) Contact (c) Technical	(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise) (b) Necessary to comply with a legal obligation
To use data analytics to improve our website, services, marketing, customer relationships and experiences	(a) Technical (b) Usage	Necessary for our legitimate interests (to define types of customers for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)
To make suggestions and recommendations to you about services that may be of interest to you	(a) Identity (b) Contact (c) Technical (d) Usage (e) Profile	Necessary for our legitimate interests (to develop our products/services and grow our business)

MARKETING

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising of other programmes offered by CDC or selected Third Parties which we think might be of benefit to you commercially. You have the right to opt out or unsubscribe to these at any point:

OPTING OUT

You can ask us or third parties to stop sending you marketing messages at any time by logging into the website and checking or unchecking relevant boxes to adjust your marketing preferences or by following the opt-out links on any marketing message sent to you or by contacting us at any time.

Where you opt out of receiving these marketing messages, this will not apply to personal

data provided to us as a result of the services we have provided you.

CHANGE OF PURPOSE

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

5. DISCLOSURES OF YOUR PERSONAL DATA

We may have to share your personal data with the parties set out below for the purposes set out in the table in paragraph 4 above.

THIRD PARTIES

Your data may be shared with the following internal third parties:

INTERNAL THIRD PARTIES

- Your identity and contact details may be shared within CDC only for the purposes of making you aware of other services that might be of interest to you. Specific information provided as part of an application process will not be shared without your written agreement
- CORSERV or Cornwall Council or accessed by their appointed auditors as a consequence of our funding requirements.
- Cornwall and Isles of Scilly Growth Hub and other Service providers acting as processors based in the UK who provide business/commercial support activities as this reduces the need to repeat your information.

EXTERNAL THIRD PARTIES

- MHCLG, DWP and associated auditors. This forms part of our contractual agreement with MHCLG and DWP.
- HM Revenue & Customs, regulators and other authorities acting as processors or joint controllers based in the United Kingdom who require reporting of processing activities in certain circumstances.
- Your information may be provided to other companies who provide administration services on our behalf, for example a mailing house or email marketing provider but solely for the purpose of providing you with the information you have requested and not for marketing purposes by anyone other than CLLD.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

6. INTERNATIONAL TRANSFERS

We do not transfer your personal data outside the European Economic Area (**EEA**).

7. DATA SECURITY

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

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

8. DATA RETENTION

HOW LONG WILL YOU USE MY PERSONAL DATA FOR?

We will only retain your personal data 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.

Information that is not related to an application and associated services will be held until the end of the CLLD programme 30 September 2022. The information will be destroyed within 3 months thereafter.

Information collected and stored directly associated with the grant application and associated services will be held until 31 December 2033 in accordance with our contracts with MHCLG & DWP. The information will be destroyed within 3 months thereafter.

9. YOUR LEGAL RIGHTS

Under certain circumstances, you have rights under data protection laws in relation to your personal data.

You have the right to:

Request access to your personal data (commonly known as a “data subject access request”). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.

Request correction of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.

Request erasure of your personal data. This enables you to ask us to delete or remove personal data 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 data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

Object to processing of your personal data 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 as you feel it impacts on

your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

Request restriction of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

Request the transfer of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

Withdraw consent at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

If you wish to exercise any of the rights set out above, please contact us.

People who make a complaint to us

When we receive a complaint from a person we make up a file, manual or electronic, containing the details of the complaint and associated investigation. This normally contains the identity of the complainant and any other individuals involved in the complaint.

We will only use the personal information we collect to process the complaint and to check on the level of service we provide. We may compile and publish statistics highlighting information such as the number of complaints we receive and time taken to resolve, but not in a form which identifies anyone.

We usually have to disclose the complainant's identity to the department/service/programme/project which the complaint is about, including third parties such as contractors, in order to fully understand and resolve an issue. If a complainant doesn't want information identifying him or her to be disclosed, we will try to respect that. However, it may not be possible to handle a complaint on an anonymous basis.

We will keep personal information contained in complaint files in line with our retention policy. Local Government Ombudsmen complaints are retained for ten years from closure. Complaint files are retained in a secure environment and access to it will be restricted according to the 'need to know' principle.

Similarly, where enquiries are submitted to us we will only use the information supplied to us to deal with the enquiry and any subsequent issues and to check on the level of service we provide.

NO FEE USUALLY REQUIRED

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

WHAT WE MAY NEED FROM YOU

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

TIME LIMIT TO RESPOND

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

10. GLOSSARY

LAWFUL BASIS

Legitimate Interest means the interest of our business in conducting and managing our business to enable us to give you the best service/product and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by contacting us

Performance of Contract means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.

Comply with a legal or regulatory obligation means processing your personal data where it is necessary for compliance with a legal or regulatory obligation that we are subject to.