



UK Shared Prosperity Fund (UKSPF) Privacy Notice

This Privacy Notice details how we will process personal data when we manage applications and grants under the UK Shared Prosperity Fund (UKSPF). Further information about the UKSPF grant scheme can be found on our website [here](#).

This Privacy Notice supplements other notices and policies published by the Borough Council of King's Lynn & West Norfolk and is not intended to override them.

Data Controller

The Borough Council of King's Lynn & West Norfolk ("we", "us", "our") is the data controller for the purposes of managing applications and grants we issue under the UKSPF scheme.

We have appointed a Data Protection Officer who is responsible for overseeing questions relating to this Privacy Notice. If you have any questions about this Privacy Notice, including any requests to exercise your rights as a data subject, please contact the Data Protection Officer using the contact details set out below.

Categories of data we collect and process

We collect and process the following categories of personal data for the purpose of managing applications and grants under the UKSPF scheme:

- Full names;
- Addresses;
- Email addresses;
- Contact telephone numbers;
- Details of the name of the organisation you are associated with, together with your role within the organisation and your status as an employee or volunteer of that organisation;
- Details of organisations you have been associated with in the past and the nature of your role and association with those organisations including as a director, trustee, officer or shareholder;
- Information about whether you are considered to be a politically exposed person (PEP) or have had any bankruptcy orders made against you.
- Information that you have published, or which has been published about you, on social media.
- Details of your participation in any projects funded by the UKSPF scheme; and
- Any additional information that may be provided to us or collected by us in connection with an application or the monitoring and management of a grant awarded under the UKSPF scheme, which may include:
 - Images;
 - special category data (meaning information relating to racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic data,



biometric data used for identification purposes, information about physical or mental health or about sex life or sexual orientation); and

- Criminal records data.

We may also create, use and share aggregated data such as statistical or demographic data for any purpose. Aggregated data could be derived from personal data but is not considered personal data in law as this data will not directly or indirectly reveal the identity of any individual person. However, if we combine or connect aggregated data with personal data so that it can directly or indirectly identify any individual, we treat the combined data as personal data which will be used in accordance with this Privacy Notice.

Please note that this Privacy Notice only concerns our processing of personal data. We will also process information about organisations, including financial information and bank account details, for the purpose of managing applications and grants under the UKSPF scheme. Information that relates to an organisation rather than an individual is business data. We will handle business data responsibly and with due care but business data is not subject to the rights and protections described in this Privacy Notice.

Where we need to collect personal data to award and manage grants under the UKSPF scheme, and you fail to provide that data when requested, we may not be able to process your organisation's application or consider your organisation for the award of a grant.

Sources of personal data

We will collect personal data that is included in an application form and any supporting documents, or that is otherwise provided to us, or collected by us, from time to time in connection with an application or, in the case of a successful application, the administration and monitoring of the award.

You may have provided us with your personal data directly if you have completed and submitted an application on behalf of an organisation or if you are named as the designated contact point within your organisation for the purposes of the UKSPF grant. Otherwise, we may have been provided with your personal data by an organisation that you work with as an employee or volunteer, or that runs a program funded by a UKSPF grant which you are involved in.

We conduct background checks and searches as part of the application and monitoring process. When we run these checks and searches we collect personal data from third party sources including:

- The internet, including social media sites;
- Companies House;
- The National Anti-Fraud Network Data and Intelligence Services;
- The Charity Register maintained by the Charity Commission;
- The Insolvency Checker;
- The National Fraud Initiative fraud hub; and
- Creditsafe



What we use your personal data for

We use personal data to: -

- Manage the application process;
- Complete background checks and searches to confirm eligibility for a grant award, for verification purposes and for the purpose of the detection and prevention of crime and fraud;
- Make payments;
- Deal with routine administrative issues and queries;
- Monitor use of grant monies and ensure compliance with the terms of the UKSPF scheme, including confirming that any spend is within the grant approval period;
- Promote and publicise the UKSPF scheme;
- Manage any complaints or disputes that may arise in relation to a UKSPF grant; and
- Comply with our ongoing record keeping and reporting obligations, including in reporting to the Department of Levelling Up Housing and Communities (DLUHC) and HMRC.

We will only use personal data for the purposes described in this Privacy Notice, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the purposes described in this Privacy Notice. If we need to use personal data for an unrelated purpose, we will notify relevant individuals 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.

Our lawful basis for processing the personal data

We must have a legal basis to process your personal data.

Most of the processing we undertake is on the basis of:

- UK GDPR Article 6(1)(e) (processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in us).

Where we process special category personal data we rely on UK GDPR Article 6(1)(e) together with:

- UK GDPR Article 9(2)(g) and paragraph 6, Schedule 1 of the Data Protection Act 2018 (processing is necessary for reasons of substantial public interest).

Where we process criminal records data we rely on UK GDPR Article 6(1)(e) together with:

- Paragraph 1(2), Schedule 2 of the Data Protection Act 2018 for the prevention or detection of crime, apprehension or prosecution of offenders or the assessment or collection of a tax or duty or an imposition of a similar nature.

Where we process personal data for the purpose of promoting or publicising the UKSPF grant scheme we rely upon consent.



Data Processors and other recipients of your data

We may share personal data with other departments of the Council where necessary to verify information or to conduct checks in relation to your application and grant, for example if your project concerns Council-owned property we may verify the property status with our property department, or if your project relates to a food business we may check with our environmental health department to confirm that there are no food licensing issues.

We may also share personal data with external third parties that will process personal data as data controllers, including:-

- The Department for Levelling Up Housing and Communities (DLUHC) which will be provided with personal data as required to ensure that we meet our reporting and monitoring obligations under the terms of the UKSPF scheme and which will process personal data in accordance with its privacy policy which you can access here: [DLUHC Personal Information Charter](#);
- HMRC which will be provided with personal data as required in order to enable us to meet our tax reporting and which will process personal data in accordance with its privacy policy which you can access here: [HM Revenue & Customs Privacy Notice](#).
- Our professional advisers including lawyers, bankers, auditors and insurers who provide consultancy, banking, legal, insurance and accounting services;
- Organisations we use when undertaking background checks, including; Companies House, The National Anti-Fraud Network Data and Intelligence Services, The Charity Commission, Insolvency Checker, The National Fraud Initiative fraud hub and Creditsafe.

We also share personal data with external third parties that will process personal data as a data processor on our behalf, including service providers who provide us with I.T technical development and support services.

International Data Transfers and Storage

We will not transfer or store personal data outside of the UK.

Personal data disposal and retention

We will only retain your personal data for as long as reasonably necessary in connection with the management of applications and grants under the UKSPF scheme, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you or an organisation with which you are connected.

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, regulatory, tax, accounting or other requirements.

Please see our [data retention policy](#) for details of how long we retain personal data in connection with specific processing purposes.



Your rights as a data subject

You have a number of rights as a data subject under the UK GDPR, which include:

1. **The right to get copies of your personal data** – you have the right to ask for a copy of any personal data about you that we hold;
2. **The right to get your personal data corrected** – you have the right to ask for any personal data that we hold about you to be corrected if it is inaccurate or completed if it is incomplete;
3. **The right to restrict how your personal data is used** – you have the right to ask us to suspend how we use any of the personal data we hold about you in certain circumstances;
4. **The right to object to your personal data being used** – you have the right to ask for any information held about you not to be used. However, this is not an absolute right, and we may need to continue using your information, and we will tell you if this is the case.
5. **The right to have personal data deleted** – you have the right to ask us to permanently delete your personal data. However, this is not an absolute right, and we may need to continue to use your personal data, and we will tell you if this is the case.

Further information about your rights and how they can be exercised can be found in the Borough Council of King's Lynn & West Norfolk's data protection policy available here: https://www.west-norfolk.gov.uk/info/20006/council_and_democracy/326/data_protection

If you are unhappy or wish to complain about how your personal data is used for the purpose of managing applications and grants under the UKSPF scheme, you should contact the Borough Council of King's Lynn & West Norfolk in the first instance.

If you are still not satisfied, you can complain to the Information Commissioners Office. Their website address is www.ico.org.uk and their postal address is:

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

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.

Data Protection Officer

The council's Data Protection Officer can be contacted at:

Data Protection Officer
Borough Council of King's Lynn & West Norfolk
King's Court
Chapel Street



Funded by
UK Government

Borough Council of
King's Lynn &
West Norfolk



King's Lynn
Norfolk
PE30 1EX
Tel: 01553 616270
Email: Dataprotection@west-norfolk.gov.uk

Automated decision making or profiling

We will not use the personal data we hold to make any significant decisions about you by purely automated means (i.e. where a decision is taken about you using an electronic system without human involvement) or to profile you.

Changes to our policy

We keep this Privacy Notice under regular review. If we update this Privacy Notice we will make the latest version available on the privacy notice page on our website. This Privacy Notice was last updated on 27 March 2023.