

Privacy Notice Supporting Information

The Wise Group is a leading social enterprise, which transforms people's lives across Scotland and North East England.

Every day we support our customers into jobs, work to lift people out of fuel poverty, and help people coming out of prison to build a better future. Our work is varied, but underlying everything we do is a passion and commitment for social justice and a fairer society for all.

We are building better lives, better communities and stronger businesses – and we don't do it alone. We work with a range of partners across all sections of society to make a real and lasting difference to the lives of thousands of people and families every year.

What is the purpose of this document?

This document provides information about the Wise Group's overarching commitment to protecting personal data and general approach to processing personal data in accordance with [Regulation \(EU\) 2016/679](#) (General Data Protection Regulation – GDPR) and [Data Protection Act 2018](#) (DPA18). The GDPR and the DPA18 determine how, when and why any organisation can process personal data. These laws exist to ensure that your data is collected lawfully, stored safely, and used responsibly.

This document is not a privacy notice in its own right but will support and complement any privacy notice you receive from us. If you work with us or access any of our programmes, services or products (including accessing our website) there will be a specific privacy notice which details exactly how we use your personal information. We process personal data for several purposes, and the means and sources of collection, lawful basis of processing, uses, purposes, disclosure, processors and third-parties involved, and retention periods for each purpose may differ. To find out more about our specific processing activities, please refer to the relevant privacy notice. It is important that you read and retain this document, together with any other privacy notice we may provide on specific occasions when we are collecting or using personal data about you so that you are aware of how and why we are using such data and what your rights are under data protection law.

At the Wise Group, we value your privacy and data protection rights. We are committed to safeguarding and protecting your personal information and using it in accordance with the applicable data protection framework.

Our commitment to the data protection principles

We take data protection very seriously. When collecting and using any personal information about you, we are committed to doing so in accordance with our obligations under the applicable data protection legislation. More specifically, the Wise Group is bound by the following principles when using your personal information:

1. *Lawfulness, fairness and transparency* – We use your personal information lawfully, fairly and in a transparent way;
2. *Purpose limitation* – We collect your personal information only for specified, explicit and legitimate purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes;
3. *Data minimisation* – We use adequate, relevant and limited to what is necessary personal information in relation to the stated purposes;
4. *Accuracy* – We hold your personal information accurate and up to date and we take all reasonable and necessary steps to ensure that;
5. *Storage limitation* – We keep your personal information only as long as necessary for the specific purposes of the described data processing;
6. *Integrity and confidentiality* – We keep and process your personal information securely to protect it against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures;
7. *Accountability* – We are in a position to demonstrate our compliance with data protection law and our obligations under the GDPR and DPA18.

Your rights under data protection law

The rights that you have depend upon the grounds upon which we have collected your information. Generally, under the GDPR and DPA18, you have the following rights:

- *Right to object*, i.e., if you ask us to stop processing your personal data, we will stop doing so unless we can demonstrate compelling grounds as to why the processing should continue in accordance with data protection law;
- *Right of access*, i.e., to receive confirmation as to whether your personal data is being processed, as well as to receive a copy of your personal data;
- *Right to rectification*, i.e., to require us to rectify any inaccurate personal data we hold about you;
- *Right to restrict processing*, if you contest the accuracy of your data and the lawfulness of processing but do not request such data being erased;
- *Right to data portability*, i.e., to receive your personal data in a structured, standard machine-readable format to transmit such data to another controller;
- *Right to erasure*, also known as the right to be forgotten, i.e., to request that we delete the data we hold about you;
- *Right to withdraw consent*;
- Rights in relation to automated decision making and profiling, i.e., to be informed when an automated decision has been taken and not to be subject to a decision based solely on automated processing, including profiling.

You also have the right to lodge a complaint with [the Information Commissioner's Office](#). If you wish to exercise any of these rights, please contact our Data Protection Officer using the contact details below. In instances where the Wise Group is not the data controller and we are processing your information on instruction from another organisation, we will tell you who to contact if you wish to exercise any of your rights.

Fees policy

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 for the administrative costs of complying with the request if your request is clearly unfounded, repetitive or excessive. We make all reasonable efforts to respond to all requests and queries within one month. Nonetheless, it could take us longer than a month if your request is particularly complex. In this case, we will keep you updated. We may need to request specific

information from you to help us confirm your identity and ensure your right to access your personal data. We may also contact you to ask you for further information in relation to your request to speed up our response.

Do you want to know more?

We are generally the data controller for the personal data we process, however, we may provide some services as a data processor. If you have any questions or concerns about how your information is used, please contact our Governance Manager on 0141 303 3131. You can also contact our Data Protection Officer using the contact details below.

The contact details of our Data Protection Officer

Should you have any queries or concerns regarding your personal data, or wish to exercise any of your rights, then please contact our external Data Protection Officer, Trilateral Research:

Email: dataprotection@thewisegroup.co.uk
Telephone: + 44 (0) 20 70528289
Post: Trilateral Research
 One Knightsbridge Green
 London
 SW1X 7QA

More information about data protection and how it applies to you can be found on the [Information Commissioner's Office website](#).

About this document

This document was last updated 23 April 2019. We want to hear from you and keep your data safe, accurate and complete. Please keep us informed about any changes regarding your personal data during your relationship with us.