

## Privacy Statement

The Wise Group is a leading social enterprise working to lift people out of poverty. As an enterprise, we build bridges to opportunity for the most vulnerable in our society. 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.

The Wise Group builds better lives, better communities and stronger businesses. We work with a range of partners to make a real and lasting difference to the lives of thousands of people and families every year.

This privacy statement sets out how we use and protect the personal information we process, and the rights of the individuals who trust us with their information. It also describes our commitment to data protection principles and how to get in touch with us. This statement is supplemented by more detailed and specific privacy notices, most of which are available on our website (<https://www.thewisegroup.co.uk/privacy/>). If you can't find what you're looking for, please get in touch by emailing [enquiries@thewisegroup.co.uk](mailto:enquiries@thewisegroup.co.uk) or call 0141 303 3131.

### About us

The Wise Group is registered with the Information Commissioner's Office (ICO) as a **data controller**. This means that when we process personal information on our own behalf, we are responsible for determining the purposes and means of that processing.

To deliver some of our projects and services we also act as a **data processor**. This means that we process personal information on behalf another data controller, acting on their instruction.

We process personal information in accordance with UK data protection legislation (specifically the UK GDPR and the Data Protection Act 2018). These laws exist to ensure that data is collected lawfully, stored safely, and used responsibly.

### Our commitment to the data protection principles

At the Wise Group, we value privacy and data protection rights. We are committed to safeguarding and protecting personal information. When collecting and using any personal information we are committed to doing so in accordance with the following principles:

#### 1. Lawfulness, fairness and transparency

We use personal information lawfully, fairly and in a transparent way.

#### 2. Purpose limitation

We collect personal information for specified, explicit and legitimate purposes that we have openly communicated.

#### 3. Data minimisation

The personal information we use is adequate, relevant, and limited to what is necessary.

#### 4. Accuracy

Personal information is maintained for accuracy and we take all reasonable steps to ensure that it's kept up to date.

#### 5. Storage limitation

We keep personal information only for as long as is necessary.

#### 6. Integrity and confidentiality

We keep and process personal information securely to protect it against unauthorised or unlawful processing and against accidental loss, destruction, or damage.

#### 7. Accountability

We comply with these principles and can demonstrate our compliance with data protection law.

## Personal data processing

Personal data 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 collect and use personal information in the following circumstances:

- **If you are referred to or access one of our services as a customer**

We process information such as name, contact information, details of your personal circumstances and support needs, and any other information relevant to the service you're accessing. We do this so we can provide a tailored support package to meet your individual needs.

Depending on the service you access, you might be asked for your permission for us to process some information about you which is more sensitive (for example, health-related information or information about past offending). We only ask this where it is relevant to the service and your consent is freely given (you are under no obligation to provide this).

Before joining a Wise Group service, the personal information we process will be explained to you so you can make an informed decision about whether you wish to participate. A range of service-specific privacy notices are published on our website: <https://www.thewisegroup.co.uk/privacy/>

- **If you apply to a Wise Group vacancy**

We process information such as name, contact details, employment/education history, skills/knowledge/experience, and any other information we might need to determine your suitability for the role you applied for. We use this information to shortlist suitable candidates for interview, conduct interviews and make a job offers.

During the recruitment process we also:

- Ask for equal opportunities information so we can conduct equal opportunities monitoring
- Conduct pre-employment checks including reference checks and making sure you have the right to work in the UK. Some roles may require a criminal records check to be conducted
- Ask individuals who have accepted a job offer to complete a health questionnaire so we can ensure we have all suitable and reasonable adjustments in place for you.

- **If you work with us as a Wise Group colleague**

We process information such as name, contact information, background details, performance and capability, learning and development, salary/payment and bank details (so we can pay you), health and safety assessments, and any other information we may need during your employment to meet our legal obligations as an employer.

- **If you are a Trustee**

We process information such as name, contact information, and other details we may need to meet our legal obligations.

- **If you provide us with goods and services, or work with us in any other capacity**

We process information such as name, company, contact information, nature of relationship, payment and bank details (if applicable), and any other information which is relevant to our relationship or helps us meet our legal and contractual obligations.

- **If you visit one of our hubs**

We process information so we know who you are and why you're visiting us, to protect you while you're visiting us and for security. We may take your photograph to produce a temporary security pass whilst you're on site.

- **If you attend an event that we organise**

We process information such as name, contact details, attendance and other event-specific details. We may take photographs at events that we may use in appropriate publicity materials.

- **If you use our websites**

We process information such as IP address, browser and other details of the devices you use. Full details can be found here: <https://www.thewisegroup.co.uk/privacy/>

- **If you make an enquiry or a complaint**

We process information such as name, contact information and details relevant to your enquiry or complaint to make sure we manage it appropriately.

Please note that during our interactions with you we might provide you with links to other websites or signpost you to other services or platforms, including social media channels. We are not in control of these resources, so we strongly recommend that you exercise caution and look at the privacy statement applicable to the website, platform, or service.

### **Data protection rights**

The rights available to individuals depends on the legal basis for processing, but generally individuals have the following rights:

- **Right of access**

To receive confirmation if we process your personal information and receive a copy of your data.

- **Right to rectification**

To require us to correct any inaccurate personal information we hold.

- **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 object**

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 to data portability**

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)

To request that we delete the data we hold about you.

- **Right to withdraw consent**

If you no longer give us consent to process personal information (this does not affect the lawfulness of processing before consent was withdrawn).

- **Automated decision making and profiling**

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.

### **Security**

We have a range of technical and organisational controls to protect personal information. They are regularly evaluated to ensure current and emerging threats to privacy are managed effectively.

Any partners and suppliers we contract with, (including those who support our IT and computer systems) are carefully selected, managed, and bound by strict contractual and confidentiality terms.

### **Sharing your personal data**

Personal information is only shared where we are required by law, where it is necessary to administer our relationship with you, where we have your consent, or where we have another relevant, carefully assessed legitimate interest in doing so.

Personal information held by the Wise Group may be shared with governmental organisations and departments to enable them to exercise their statutory duties as required by law.

We will not disclose your personal information to third parties unless there is a lawful ground for this.

We do not sell personal information and we do not share it for marketing purposes unless you consent to this processing.

### **Record retention**

Personal information will not be kept for longer than is necessary. Our record retention policy and associated schedule governs how long information is kept for, and ensures we comply with all obligations and applicable legislation.

### **Fees policy**

Individuals will not have to pay a fee to access their personal data or to exercise any of their other rights. However, we may charge a reasonable fee for the administrative costs of complying with the request if it 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 in particularly complex circumstances but we will provide updates throughout the process. We may need to request specific information from you to help us confirm your identity. We may also contact you to ask you for further information in relation to your request to speed up our response.

### **Our Data Protection Officer**

Should you have any general queries or wish to know more about this statement, please contact the Wise Group by email or phone:

- [enquiries@thewisegroup.co.uk](mailto:enquiries@thewisegroup.co.uk)
- 0141 303 3131

If you have any concerns regarding our use of your personal data, or wish to exercise any of your rights, then please contact our Data Protection Officer:

Email: [dataprotection@thewisegroup.co.uk](mailto:dataprotection@thewisegroup.co.uk)  
Telephone: 02070528289  
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 statement**

We keep our privacy notices under regular review and may update this notice at any time. This notice was last updated in June 2021.

This notice does not form part of any contract of employment or another contract to provide services.