



## Privacy Statement – Consent based data collection

Last updated: 17/04/2023

### 1 Who we are

We are a network of people working in Higher Education who provide services across the Higher Education sector on projects spanning education, technology, culture, and continuous improvement.

### 2 Our contact details

HEdway Group Limited  
St Nicholas  
Brocks Lane  
Cornwall  
PL10 1DJ

### 3 Information we collect

This Privacy Statement covers instances where you have given us consent to collect information about you as a result of participation in an interview, meeting, workshop, focus group, survey, initiative, or project (**"The Activity"**).

We will only ask you for data that is relevant to meet the objectives of **The Activity** we have asked you to participate in. You will be given the details of **The Activity** before choosing to provide us with your data.

### 4 Information we may ask you to provide

Personal information such as, but not limited to, your name, phone number, email address and organisational IDs to enable us to contact you and send you further information relevant to **The Activity** we have asked you to engage with.

Your personal characteristics, not limited to your gender, gender identity and age.

Your personal background not limited to your nationality, education and profession.

Special Category Data, this includes:

- Your racial or ethnic origin;
- Your political opinions;
- Your religious or philosophical beliefs;
- Trade union membership;
- data concerning your health;
- data concerning your sex life;
- data concerning your sexual orientation.

We may also collect additional information you give us when providing feedback, responding to surveys, or communicating with our associates electronically or in person.

## 5 Information HEdway collects

On occasion we may combine the information you provide us with information given to us by a third party (our clients). Where this is the case, you will be informed in advance.

## 6 How we use the information

We will use your information to complete the objectives of The Activity. This could include, but is not limited to:

1. Combining your data with the data of others to produce reports for third parties (our client)
2. Analysing your personal data to identify demographic trends
3. Pseudonymisation or anonymisation of your data
4. Contacting you with more information about **The Activity**

The specific objectives of **The Activity** will be shared with you in advance.

## 7 What is the legal basis for processing your data?

Our legal basis for collecting and processing your data under this agreement is Consent.

You have the choice to provide us with, or to not provide us with, any of the information that we request.

This document, along with the specific details of **The Activity** that we provide you with will explain to you any processing we may perform on your data.

You have the right to withdraw this consent at any time, this is further explained in Section 10.

## 8 Disclosure of your information

We will inform you, before you provide us with your data, if we plan to share it with any third party. However there are other limited instances where we may disclose your information:

1. We may from time to time need to disclose personal information to comply with a legal requirement, such as a law, regulation, court order, subpoena, warrant, in the course of a legal proceeding or in response to a law enforcement agency request.
2. If there is a change of control in our business or a sale or transfer of business assets, we reserve the right to transfer to the extent permissible at law our user databases, together with any personal information and non-personal information contained in those databases. This information may be disclosed to a potential purchaser under an agreement to maintain confidentiality. We would seek to only disclose information in good faith and where required by any of the above circumstances.
3. By providing us with personal information, you consent to the terms of this Privacy Statement and the types of disclosure covered by this Statement. Where we disclose your personal information to third parties, we will request that the third party follow this Statement regarding handling your personal information.

## 9 How we protect your information

HEdway is committed to ensuring that the information you provide to us is secure. In order to prevent unauthorised access or disclosure, we have put in place suitable physical, electronic and managerial procedures to safeguard and secure information and protect it from misuse, interference, loss and unauthorised access, modification and disclosure.

The transmission and exchange of information is carried out at your own risk. We cannot guarantee the security of any information that you transmit to us, or receive from us. Although we take measures to safeguard against unauthorised disclosures of information, we cannot assure you that personal information that we collect will not be disclosed in a manner that is inconsistent with this Privacy Statement.

## 10 Your rights regarding your personal information

Under the GDPR, you have the following rights with respect to your personal information:

### 10.1 Obtain a copy of your information

You have the right to request and receive a copy of the personal information we hold about you. If you would like to request a copy please e-mail us at [HEdwayDPO@hedwaygroup.com](mailto:HEdwayDPO@hedwaygroup.com). We reserve the right to refuse to provide you with information that we hold about you, in certain circumstances set out in the GDPR.

### 10.2 Correct your information

You are entitled to have your personal information updated to ensure it is current and accurate. If you believe any information we hold on you is inaccurate, out of date, incomplete, irrelevant or misleading, please send us an email to [HEdwayDPO@hedwaygroup.com](mailto:HEdwayDPO@hedwaygroup.com). We will endeavour to promptly correct any information found to be inaccurate, incomplete or out of date.

### 10.3 Withdraw consent

You have the right to withdraw your consent to any processing that is currently being done under your consent, such as marketing. Consent can be withdrawn by sending an email to [HEdwayDPO@hedwaygroup.com](mailto:HEdwayDPO@hedwaygroup.com).

### 10.4 Delete your information

You can request that we delete personal information in certain circumstances. These will be specific to each case. You can do this by sending an email to [HEdwayDPO@hedwaygroup.com](mailto:HEdwayDPO@hedwaygroup.com), providing the full details of the data to be deleted.

### 10.5 Data portability

You have the right to ask us to transfer the personal information that you have given us to another controller. Please request this by sending an email to [HEdwayDPO@hedwaygroup.com](mailto:HEdwayDPO@hedwaygroup.com).

## 10.6 Restrict processing

You can request a restriction on the processing of your data in some limited circumstances. Examples are concerns over data accuracy or we no longer need to hold your data but you have requested its retention by us to aid you in a legal matter. You can do this by sending an email to [HEdwayDPO@hedwaygroup.com](mailto:HEdwayDPO@hedwaygroup.com).

## 10.7 Right to object to processing

You have the right to request that we stop processing your data for marketing purposes and in other limited circumstances such as asking us not to process your data by wholly automated means or not to analyse your information for targeted content etc (also known as profiling). You can action any of these rights by sending an email to [HEdwayDPO@hedwaygroup.com](mailto:HEdwayDPO@hedwaygroup.com).

## 10.8 Right of complaint to the Information Commissioner

The UK GDPR is regulated and enforced by the Information Commissioner's Office (ICO). Every individual has the right to raise a concern/complaint to the ICO about how their personal information and/or privacy is treated. You can do this via the ICO's website, follow the links or have an online Live Chat:

### Method to contact IOC

**Call the ICO helpline:** 0303 123 1113

**Email:** [casework@ico.org.uk](mailto:casework@ico.org.uk)

**Postal address:** Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF

## 11 How long we hold your data

We will keep your information for as long as is required to carry out the objectives of **The Activity** we have asked you participate in and we have a valid reason to do so.

Your personal data will be securely deleted or fully anonymised after this period.

## 12 Updates to this statement

We may modify this statement at any time, in our sole discretion and all modifications will be effective immediately upon our posting of the modifications on our website.

We will not retroactively apply any changes to this statement to existing data you have provided us, without providing you at least 14 days notice and reminding you of your rights under Section 10.

## 13 Contact us

If you have any questions about privacy or wish to update your details or have them removed, please contact us at [HEdwayDPO@hedwaygroup.com](mailto:HEdwayDPO@hedwaygroup.com).