

## Highways England Graffiti Funding Competition Privacy Notice

### About Connected Places Catapult

Connected Places Catapult is the trading name of Connected Places Catapult Limited. We focus on growing businesses with innovations in mobility services and the built environment that enables new levels of physical, digital, and social connectedness. Our company registration number is 11837978 and our registered office is 170 Midsummer Boulevard, Milton Keynes, United Kingdom, MK9 1BP. Connected Places Catapult is registered with the Information Commissioner's Office, registration number ZA773397.

This privacy notice applies to anyone who asks about or is involved in the Highways England Graffiti Funding Competition in any way. We take privacy seriously and we want you as our service user, to understand the information we collect about you, how we process and protect the personal information which we collect about you, from you and from third parties, so that you can be confident that the information is being used safely and in ways that are reasonably expected, and what rights you have in respect of your personal information. References to 'we', 'us' and 'our', means Connected Places Catapult.

### What information do we collect and use?

We will collect personal information which can include:

- Company details (inc. name, address, registration number, VAT registration number, insurance, category (type) of company)
- Any company links on social media (inc. Twitter, LinkedIn, Instagram, Facebook)
- Any parent company details (company name, address, telephone number, email address, contact name)
- Collaboration details of any companies involved with in your project (company name, address, telephone number, email address, contact name)
- Authority details who are involved with in your project (organisation name, telephone number, email address, contact name)
- Your contact details (inc. name, job title, address, telephone and mobile number, email address)
- Finance contact details (inc. name, telephone number, email address)
- Due diligence information (inc. accounts, policy and process documents, investigation/convictions/notice details, enforcement/remedial orders)
- Details on any conflicts of interest
- Details of any previous applications
- Project details (inc. project name, summary, project plan)
- Project finances (inc. individuals involved, daily rates, no. days worked, sub-contractor charges, material cost and other expenses)
- Finance details for programme funding (ie. bank details, grant aid option, evidence for grant aid option, signed conditional grant offer letter)
- Project reporting (inc. monthly progress updates, final report)
- Your IP address

Your personal information collected will be used to allow us to deliver services on behalf of Highways England and assess whether your application meets the criteria and scope of the programme. The programme operates on an open and transparent basis, your application will be assessed against the assessment criteria, detailed in the Application Guidance document for this Programme. Your IP address will be used to allow Connected Places Catapult to set appropriate access permissions on the website.

Access to and use of information concerning yourself and your company is strictly controlled to ensure compliance with applicable data protection law. In many cases we pseudonymise or anonymise your information before we share it with others, or when we no longer require the information in identifiable form. Anonymisation is the process of turning data into a form which does not identify individuals and where identification is not likely to take place. Pseudonymisation is the processing of information in such a way that it can no longer be attributed to you without the use of additional information and where that additional information is kept separately. This allows for a much wider use of the information for statistical or other purposes.

#### **Who do we collect information from?**

Information may be collected directly from you to support your application to the Highways England Graffiti Funding Competition; this information can be collected when:

- you use our website
- when you complete the programme application form
- when you apply for grant aid

#### **What is your information used for?**

We use your information for a number of purposes. Whenever we use your information, we must have a legal justification under data protection law for its use. The legal justification will depend on the purpose for which we intend using your information.

Our legal justification for processing your personal information generally falls into the below categories below within Article 6 of the General Data Protection Regulation:

- Article 6 (1) (a) Consent – You have consented for us to process your personal data for the purpose of the Highways England Graffiti Funding Competition
- Article 6 (1) (b) Contract – the processing is necessary to fulfil the contract in place to deliver the Highways England Graffiti Funding Competition on behalf of Highways England
- Article 6 (1) (f) Legitimate Interest – processing is necessary for the purposes of the legitimate interests pursued by Connected Places Catapult to enable the delivery of the Highways England Graffiti Funding Competition.

#### **Who do we share information with?**

It is important that you understand that we may share your information with others. We may share your personal information within our group of companies and with third parties.

- **Sharing with the Connected Places Catapult group**  
We may share your personal information within the Connected Places Catapult group of companies.
- **Sharing with third parties**

We may share your personal information with third parties listed below for the purposes identified within this privacy notice:

- Companies, Government entities, Local Authorities looking for innovative thinking companies within the programme
- IT support companies to maintain, and support the Connected Places Catapult website and platform

#### **How long do we keep your personal information for?**

We retain information in accordance with our legal obligations and national best practice. We ensure compliance through regular auditing and ensure information is securely disposed of when it has reached the end of its retention period. We implement data retention periods for different categories of personal data and/or different processing purposes, including where appropriate, archiving periods. We will only keep your personal information for as long as reasonably necessary to support service users, to support our legitimate business interests and to comply with our legal and regulatory requirements.

#### **International transfers of your personal information**

Connected Places Catapult takes part in global projects. We (or third parties acting on our behalf) may store or process information that we collect about you in countries outside the UK. Information may be transferred, processed and stored outside of the country where your information is collected, including countries where the level of data protection may not be deemed adequate by the local legal or regulatory authority in the country of origin of the data.

Where we make a transfer of your personal information outside of the UK, we will take the required steps to ensure that your personal information is protected.

We also process personal information within the Connected Places Catapult group of companies for administrative and management purposes. This processing is based on our own or a third party's legitimate business interests and the transfer is compliant with applicable data protection law. If you would like further information regarding the steps we take to safeguard your personal information when making international transfers, please contact the Data Protection Manager using the details at the bottom of this privacy notice.

#### **Your rights and your personal information**

Under data protection law you have a number of specific rights in relation to the personal information that we hold about you. These include rights to know what information we hold about you and how it is used. You may also exercise these rights at any time by contacting us using the details set out at the top of this privacy notice and without adversely affecting your service.

We will not usually charge for handling a request to exercise your rights. If we cannot comply with your request to exercise your rights, we will usually tell you why.

If you make a large number of requests or it is clear that it is not reasonable for us to comply with a request, then we do not have to respond. Alternatively, we can charge for responding.

Under data protection legislation you have the right to:

- be informed
- access your personal information
- rectification

- erasure
- restriction of processing
- data portability
- object
- not be subjected to automated decisions
- withdraw consent

You also have the right to complain to the Information Commissioner's Office (ICO) if you are unhappy with the way that we have dealt with a request from you to exercise any of these rights, or if you think we have not complied with our legal obligations. Whilst you are not obliged to do so, we would appreciate you making us aware of any issue prior to notifying the ICO and giving us the opportunity to respond. You can contact either the Risk and Compliance Manager or Data Protection Manager using the postal address at the top of the privacy notice. More information can be obtained either on the ICO website (<https://ico.org.uk/>) or by calling 0303 123 1113.

Making a complaint will not affect any other legal rights or remedies that you have.

### Securing your data

We have implemented appropriate technical and organisational security to protect your personal information, this includes:

- Ensuring our staff complete annual training
- Ensuring personal information is only accessible and shared with individuals that have a need to access it
- Where personal information is transferred outside of the UK, we will ensure there are appropriate security measures in place to protect the data in accordance with UK data protection laws.

Please contact us if you require further information about how we secure your data.

### Queries

If you have any queries or would like to exercise your rights or to establish whether any rights apply to you, please speak with the Connected Places Catapult delivery lead for the Highways England Graffiti Funding Competition.

You can also contact our Data Protection Manager:

Email: [dataprotection@cp-catapult.org.uk](mailto:dataprotection@cp-catapult.org.uk) Telephone: +44 (0)1908 359 999

or by writing to the address at the top of this privacy notice, marking your communication "Private and Confidential - FAO Connected Places Catapult Data Protection Manager".

### Updates to this Privacy Notice

We may update this Privacy Notice from time to time to ensure that it remains accurate. In the event that these changes result in any material difference to the manner in which we process your personal data then we will provide you with an updated copy of the Policy and signpost you to specific changes.