

Privacy Policy

Upskill Enterprise Ltd., collect, store and use information about you. This privacy policy explains how our website www.upskillenterprise.com collects and obtains information when you visit the site. This Policy is compliant with the new General Data Protection Regulation (GDPR) in Europe.

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Overview

Upskill Enterprise is a data controller. A controller determines the purposes and means of processing personal data. We are a limited company, and like many businesses we collect, store and use data about individuals, companies and sectors of work. Our privacy policy gives details such as retention timescales, which third parties we work with and types of data collected. If you have any questions our data controller is Rowena, and you can contact her via email rowena@upskillenterprise.com

Data Approach: How we collect or obtain information about you:

- ✓ If you give us details when contacting us, placing an order on our website, signing up to our e-newsletter, completing a contact form and/or beginning a live chat
- ✓ When accepting the use of cookies on our website
- ✓ By using our product, WorkForce Triage in which the main contact enters their details and can view the details entered by their employees. However, for all other users the information is anonymised.

What information is Upskill collecting?

Typically, we collect your; name, contact details, payment information e.g. your credit or debit card details/invoice details, company name, IP address, cookie information, information about your computer or device (e.g. device and browser type). If we begin to collect other data we will either contact you directly to renew permissions to do so and/or update our privacy policy, making it clear on the website when updates take place.

We also may look at data about how you use www.upskillenterprise.com such as what pages you viewed, what you clicked on, and your geographical location (based on your computer/internet location address).

What is Upskill using the information for?

We will contact you regarding projects, business opportunities, and occasionally promotional offers from Upskill Enterprise only. We include this type of activity as part of our daily business and administrative activities. We will also use your information to process purchases you may make on the website, to make our business better, to complete any legal or contractual obligations, to no more than 4 times a year advertise our goods and services, and to review your use of our online platforms and websites.

Do you sell information to other services or businesses?

No, currently we do not sell general or identifiable data for profit, we use data to design and implement our services and goods, sometimes sharing with service providers selected by Upskill Enterprise or to complete any work we contract with you. We will give your data where we are legally required to, although only to legal authorities recognised by UK Government under UK law. Any data disclosed to third parties, outside of legally requested data, will in the first place be anonymised and generalised to give statistical information. If the data required to share with third parties includes personally identifiable information, Upskill Enterprise will first contact the Individual/Service User to gain consent beforehand.

Can Upskill keep the information forever?

No, GDPR is about giving individuals the rights to control their own data, including the right to be forgotten. We explain in detail how long we keep different bits of data further in this policy. In general, we will keep data for 18 months unless otherwise required by legal obligations (such as tax reasons, funding agreements, prior consent, legitimate interests). No data longer than necessary, taking into account any legal obligations we have (e.g. to maintain records for tax purposes), any other legal basis we have for using your information (e.g. your consent, performance of a contract with you or our legitimate interests as a business) and project lifecycles e.g. 24-36 months of being engaged in a European project such as Horizon 2020 where we may need to contact partners, share updates or invite contacts to join new consortia and certain additional factors described in the main section below about retention policies.

Law & Security: What security is there to protect my data?

Like many businesses we use Secure Sockets Layer (SSL) technology and make sure we use secure servers. All devices used within Upskill Enterprise carrying McAfee Anti-Virus software including on mobile phones, tablets, laptops and external storage devices. All data is encrypted and all Apps containing information is subject to an additional layer of security requiring a 6-digit pin or biometric security.

Are cookies part of this new policy?

Our website will continue to use cookies to analyse how visitors use the site and where they are from based on their IP address. We do this to understand the function and gain monthly analysis to improve our business. For more information, please visit our cookies policy here: www.upskillenterprise.com/privacypolicy

Does my data leave the EU? If so how is it used and protected?

Upskill Enterprise works with overseas organisations, which sometimes includes benchmarking data collected in Europe. Typically, this data is anonymised to provide comparisons, if individual's data is relevant and important to a project, Upskill Enterprise will seek permission from the Service User before sharing. Overseas partners will be asked what security processes and organisational security measures are in place if receiving data about any European Individuals/Service Users. We will store the details of these measures in a Microsoft Excel sheet saved in the Upskill Enterprise Cloud Based Server. Individuals/Service Users can request to view this by emailing hello@upskillenterprise.com quoting Overseas Security Log.

Currently our Overseas partners are in USA, Canada, Singapore with plans to work in New Zealand and Australia in the next three years. If this list changes, Upskill Enterprise will update this policy as part of the 6 monthly checking processes.

Our servers are based in the USA via GoDaddy and Microsoft. Our main Customer Relations Management (CRM) system is based in the EEA via HubSpot.

I've heard that to be GDPR compliant you have to select a lawful basis for use of data.

What is Upskill Enterprise's lawful basis?

Under the GDPR, organisations need to ensure activities involving the processing of personal information are undertaken under one of the six legal grounds for processing. Article 6(1) of the GDPR sets out the conditions that must be met for the processing of personal data to be lawful. They are:

- (a) the data subject has given consent to the processing of their personal data for one or more specific purposes;
- (b) processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract;
- (c) processing is necessary for compliance with a legal obligation to which the controller is subject;
- (d) processing is necessary in order to protect the vital interests of the data subject;
- (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 the controller;
- (f) processing is necessary for the purposes of the legitimate interests pursued by a controller, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data, in particular where the data subject is a child. This shall not apply to processing carried out by public authorities in the performance of their tasks.

These conditions are all equally valid and organisations must assess which of these grounds are most appropriate for different processing activities and then fulfil any further requirements the GDPR sets out for these conditions (GDPR Article 5).

CONSENT as a legal ground for processing personal data which matches the intended use of data by Upskill Enterprise Ltd. The GDPR defines Consent in Article 4(11) as:

- ‘consent’ of the data subject means any freely given, specific, informed and unambiguous indication of the data subject’s wishes by which they, by a statement or by a clear affirmative action, signifies agreement to the processing of personal data relating to him or her;

Recital 32 states:

Consent should be given by a clear affirmative act establishing a freely given, specific, informed and unambiguous indication of the data subject’s agreement to the processing of personal data relating to him or her, such as by a written statement, including by electronic means, or an oral statement. This could include ticking a box when visiting an internet website, choosing technical settings for information society services or another statement or conduct which clearly indicates in this context the data subject’s acceptance of the proposed processing of his or her personal data. Silence, pre-ticked boxes or inactivity should not therefore constitute consent. Consent should cover all processing activities carried out for the same purpose or purposes. When the processing has multiple purposes, consent should be given for all of them. If the data subject’s consent is to be given following a request by electronic means, the request must be clear, concise and not unnecessarily disruptive to the use of the service for which it is provided.

The UK’s Data Protection Regulator’s (ICO) draft guidance on Consent clearly states that Consent requires a positive opt-in. This means Upskill Enterprise will never use pre-ticked boxes or any other method of consent by default. The ICO has also stressed the following:

- Consent must be named, i.e. third parties with whom the data may be shared with must be specifically named. Simply providing categories of third parties will not be acceptable.
- Consent should be granular, i.e. separate consent should be obtained for independent processing operations
- Consent mustn’t be a pre-condition and should not be bundled in with Terms & Conditions
- Consent should only be relied upon if;
 - there is no other lawful basis for processing
 - you can give individuals a genuine choice
 - when you are required to have consent i.e. for electronic marketing.

Upskill Enterprise will comply with all these requirements for **the lawful basis of Consent**. Genuine consent should put individuals in charge, build trust and engagement, and enhance our reputation. Upskill Enterprise will never make data consent a prerequisite of accessing our services or products. If it is vital to the completion of the work this will be negotiated on an individual basis including agreed storage systems and retention/deletion timescales.

Informed consent is when:

- An Individual/Service User clearly understands why their information is needed, who it will be shared with, the possible consequences of them agreeing or refusing the proposed use of the data
- And then gives their consent.

Upskill Enterprise will ensure that data is collected within the boundaries defined in this policy. This applies to data that is collected in person including business cards and notes made in meetings, or by completing a form online, during a workshop or other event, and in person.

When collecting data, Upskill Enterprise will ensure that the Individual/Service User:

- Clearly understands why the information is needed
- Understands what it will be used for and what the consequences are should the Individual/Service User decide not to give consent to processing
- Is, as far as reasonably practicable, competent enough to give consent and has given so freely without any duress
- Has received sufficient information on why their data is needed and how it will be used.

Upskill Enterprise may share statistical data with other agencies such as the local authority, funding bodies and other voluntary agencies. This data should not include identifiable personal data unless express permissions has been sought by Upskill Enterprise first.

The Individual/Service User will be made aware in most circumstances how and with whom their information will be shared. There are circumstances where the law allows Upskill Enterprise to disclose data (including sensitive data) without the data subject's consent.

These are:

- a) Carrying out a legal duty or as authorised by the Secretary of State
- b) Protecting vital interests of an Individual/Service User or other person
- c) The Individual/Service User has already made the information public
- d) Conducting any legal proceedings, obtaining legal advice or defending any legal rights
- e) Monitoring for equal opportunities purposes – i.e. race, disability or religion
- f) Providing a confidential service where the Individual/Service User's consent cannot be obtained or where it is reasonable to proceed without consent: e.g. where we would wish to avoid forcing stressed or ill individuals/Service Users to provide consent signatures.

Upskill Enterprise regards the lawful and correct treatment of personal information as very important to successful working, and to maintaining the confidence of those with whom we work with. Upskill Enterprise intends to ensure that personal information is treated lawfully and correctly.

To this end, Upskill Enterprise will adhere to the Principles of Data Protection, as detailed in the GDPR. This includes the principles that require personal information:

- Shall be processed fairly, clearly and lawfully. In particular, data will not be processed unless specific conditions are met,
- Shall be obtained only for one or more of the purposes specified in the Regulation, and shall not be processed in any manner incompatible with that purpose or those purposes,
- Shall be adequate, relevant and not excessive in relation to the stated purpose(s)
- Shall be accurate and kept up to date,
- Shall not be kept for longer than is necessary. Timescales are given below.
- Shall be processed in accordance with the rights of data subjects under the Regulation,
- Shall be kept secure by the Data Controller who takes appropriate technical and other measures to prevent unauthorised or unlawful processing or accidental loss or destruction of, or damage to, personal information. Further details given below.
- Shall not be transferred to a country or territory outside the European Economic Area unless that country or territory ensures an adequate level of protection for the rights and freedoms of individuals/Service Users in relation to the processing of personal information.

Upskill Enterprise will, through appropriate management and strict application of criteria and controls:

- Observe fully the conditions regarding the fair collection and use of information
- Meet its legal obligations to specify the purposes for which information is used
- Collect and process appropriate information, and only to the extent that it is needed to fulfil its operational needs or to comply with any legal requirements
- Ensure the quality of information used
- Ensure that the rights of people about whom information is held, can be fully exercised under GDPR.

These include:

- The right to be informed that processing is being undertaken,
- The right of access to one's personal information
- The right to prevent processing in certain circumstances and

- The right to correct, rectify, block, or erase parts or all personal information held by contacting hello@upskillenterprise.com quoting GDPR in the title, or calling +44 (0) 2890 737873. Upskill Enterprise commits to making required changes or removals within 72 hours of notification.
- Treat people justly and fairly whatever their age, religion, disability, gender, sexual orientation or ethnicity when dealing with requests for information. We do not intentionally collect sensitive personal information and will notify all contacts if this changes, or if there has been an unintentionally breach of this. We ask that you do not submit data to us that you are not comfortable sharing.
- Set out clear procedures for both Upskill staff as well as Individuals/Service Users responding to requests for information within 72 hours.

Is Upskill storing my data onsite at their office?

We have lockable filing cabinets where we store printed project documentation and business contact cards. All other data is entered using online systems. Our website is hosted by GoDaddy with the page management system provided by Wix; both of whom are GDPR compliant as data processors. This helps us to ensure network and IT security and so that the server and website are not subject to breaches. We monitor and analyse log files to help prevent unauthorised access. As mentioned we use McAfee products to avoid embedding of malicious code, services attacks and other cyberattacks.

GoDaddy's own data centre is in Phoenix, Arizona, and it has two leased sites in the state of Scottsdale, which is also home to its headquarters, and Mesa. The others are in Los Angeles, Chicago, Ashburn, Virginia, Amsterdam and Singapore.

We also use Microsoft servers to store and process our emails through Outlook, and documents/work saved on SharePoint both using Office 365. Microsoft servers are located in Cardiff, Durham and London serving United Kingdom businesses.

We work hard to make sure we detect unusual or suspicious activity and include the process for responding to breaches as part of our staff induction and training processes. This includes responding within 72h, informing the ICO, informing those impacted by any breaches and to review the process that allowed a breach to stop repetition of the problem.

Us: Upskill Enterprise Limited

Upskill Enterprise is the Data Controller under the Act, which means that it determines what purposes personal information held, will be used for. It is also responsible for notifying the Information Commissioner of the data it holds or is likely to hold, and the general purposes that this data will be used for. This is also explained below.

The Data Protection Act 1998 required every organisation that processes personal information to register with the Information Commissioner's Office (ICO), unless they are exempt. Upskill Enterprise has done so since early 2016. The ICO publishes the name and address of these data controllers, as well as a description of the kind of processing they do. To find Upskill Enterprise on the database follow this link: <https://ico.org.uk/esdwebpages/search>

We will also need our registration number, name, address and postcode which can be found below:

- ZA168054
- Upskill Enterprise Ltd.
- Unit 4, Innovation Centre, Queens Road, Titanic Quarter, Belfast
- BT3 9DT

These are the same details required to log a formal complaint with the ICO regarding any issues you may have with the data handling completed by Upskill Enterprise. We hope that you will give us the chance to investigate any issue you have or concerns you would like to raise by emailing us first at hello@upskillenterprise.com. Please note the ICO is committed to updating the database on 25 May 2018 for public access. Data controllers may amend their register entry throughout the year. Upskill Enterprise will review our entry every 6 months to

ensure it continues to accurately reflect how we use data. If you have any questions about this Privacy Policy, please contact the data controller, Rowena using the email address rowena@upskillenterprise.com

What happens when you contact Upskill?

We love hearing from you and aim to keep records that accurately reflect your interest in our business and how we may be able to support you in the future. When you contact us we keep a record on HubSpot, a secure CRM system, and Microsoft Outlook as well as Microsoft SharePoint. The list below shows you what we're keeping, where and why.

Emails:

We keep emails for up to 24 months. This allows us to improve our business and services and to contact you in line with different funding cycles/timescales and opportunities. These emails are stored on encrypted servers within designated folders according to area of interest e.g. Horizon 2020, bids, health etc. This allows us to respond to enquiries and messages.

We save copies of both received and sent emails for this length of time. We take all contact details within email signatures to input into our CRM system. This includes name, job title, phone number, email address and sometimes notes on areas of interest. We stay compliant with Article 6(1)(b) of GDPR.

Storage and sharing of your emails:

Microsoft 365 stores the emails we send and receive on their servers. Microsoft adheres to the principles of the EU-U.S. and Swiss-U.S. Privacy Shield frameworks. They have servers in the US as well as Europe, Africa and Asia. Their privacy policy can be found here: <https://privacy.microsoft.com/en-gb/privacystatement>

Other forms of contact:

Whilst email is typically our most common form of contact with clients and Service Users, please see below to understand what happens when you use other methods to say hello.

Types of Contact	Data collected and stored. Why?	Where data is kept	Use of third party service or in-house
Telephone	The phone number is saved as well as name, company and job title. Notes may be written and saved regarding content of the conversation. To follow business leads and interest in services.	HubSpot CRM system. Accessed by authorised Upskill staff only.	HubSpot. Encrypted laptops used to data input.
Networking, conferences, open workshops	Business cards including job title, email, phone, company, name. Notes on area of interest regarding Upskill projects and services. To further discussions and opportunities for projects and commissioning of services.	All data will be added on to HubSpot within a week of receiving the business card. When this is done the paper copies will be destroyed using an officer shredder. Before data entry the business cards are stored in a locked filing cabinet.	HubSpot. In-house secure storage. Encrypted laptops used to data input.
Project meetings	Name, email, company, phone number, role title of attendees. To maintain project	Project notes in Microsoft SharePoint. Details added to HubSpot.	Microsoft 365. HubSpot.

Types of Contact	Data collected and stored. Why?	Where data is kept	Use of third party service or in-house
	connections and discuss project outputs.		Encrypted laptops used to data input.
Conference calls	Name, company and job title. Email if available. Meeting notes on the topics discussed. To maintain contact regarding projects and services. To further discussions and opportunities for projects and commissioning of services.	Data entry into HubSpot. Skype ID kept on Skype.	HubSpot. GoToMeeting and Skype typically used for conference calls. Skype and GoToMeeting logs deleted on closing the programs. Encrypted laptops used to data input. Conference calls made using mobile devices are locked apps requiring additional pin code to gain entry.
Upskill organised workshops	Name, email, phone, company, equal opportunities data, any special requirements e.g. dietary needs or accessibility needs to attend Upskill event.	Microsoft Outlook Microsoft SharePoint HubSpot CRM for staff working on the event only.	Microsoft Outlook Microsoft SharePoint HubSpot CRM via encrypted devices.
Website contact form	Name, email, phone, message content. To further discussions and opportunities for projects and commissioning of services.	Wix will collect and hold the data. This will be transferred within one week to Hubspot at which point it will be deleted from Wix.	Wix Hubspot via encrypted devices.
E-newsletter registration	Name, email, company. To inform on Upskill services and products as well as opinion pieces on recent skills policy/news.	Wix will collect and hold the data. This will be transferred within one week to Hubspot at which point it will be deleted from Wix. Mailouts will be completed via HubSpot.	Wix Hubspot via encrypted devices.

Regularly used contact details (name, phone, email, skype ID) for those we work with frequently will be saved on HubSpot and our mobile devices. On mobile devices the contacts app is a locked app requiring both log in to the device and an additional pin code to open the app. The contact data saved on mobile devices will be cleansed every six months. This may remove a contact from the mobile device but they will still be saved in HubSpot.

Our retention policy is as follows:

- Emails: will be kept for 24 months to allow follow up of interest in business, projects and services. If we need to keep the emails for longer in order to complete contracted work, or in line with the expectations of funders e.g. European Commission, explicit consent will be sought from the email contact.
- Telephone: data will be saved for 18 months. If leads and/or conversations have not continued after this time then the data will be removed. If the contact from this telephone call becomes a regular

client/partner their details will remain on HubSpot. Consent to maintain this data will be sought after 24 months.

- Networking, conferences, open workshops: data will be saved for 12 months. If no further contact has occurred since adding the data then it will be removed. If there is ongoing contact, further consent will be sought to keep the data for 18 months and beyond.
- Project meetings: data will be held for the lifespan of the project. Consent will be sought to keep contact details beyond the life of the project, with a note added to each Individual log with the agreed retention duration.
- Conference calls: the same policy will be implemented as for networking, conferences and open workshops.
- Upskill organised workshops: consent will be sought at the end of the workshops to keep the data for 12 months. Following this, those who agreed to this initial retention period will be subject to the same process as for networking, conferences and open workshops.
- Website contact form: the same policy will be implemented as for networking, conferences and open workshops.
- E-newsletter registration: consent to continuing sending the e-newsletter will be sought every 12 months.

For all the mentioned contact methods details will not be shared with others unless explicit consent has been given. This will typically take the form of an email asking permission and for circumstances such as sharing contact details to make an introduction to a supporting service or project the Service User has shown an interest in. If you would like to be removed at any time, please email hello@upskillenterprise.com or call our main office on +44 (0) 2890 73 78 73.

I've placed an order on your website: how if my information used?

The data you enter for an order is used only to process that order. We will need to collect your contact name, company name, company address, the name of any responsible person in the finance team we need to include in the invoice, your VAT number if you have one, your email address and telephone number. This is in order to process your order correctly under our legal and financial responsibilities. If you don't want to provide this information please call us on +44 (0) 2890 73 78 73 to discuss how else we may be able to process your order.

These details are never shared with others. We use a finance system called FreeAgent to complete invoicing and receipt of payments. This is where all the information mentioned above will be stored via encrypted devices.

You've mentioned quite a few different Apps, third party services and partners who might see some or all of my data. What is the full list?

You're right! We use several well known support services or Apps as well as working with some key partners to deliver our projects, products and services. The full list is:

Name of third party	Why do you use them? What do they see?	Are they GDPR compliant?	What is their privacy policy?
Wix	To build the content of our website. They can access the data on how you use the website and your IP address.	Yes	https://www.wix.com/about/privacy
GoDaddy	Our domain host and licencing body for our 365 login information. We pay a subscription to GoDaddy for our continual workplace use of Microsoft 365	Yes	https://uk.godaddy.com/Agreements/Privacy.aspx
Microsoft 365	To build and manage projects, contracts and complete work in the course of business using software including Word, PowerPoint,	Yes	https://privacy.microsoft.com/en-gb/privacystatement

Name of third party	Why do you use them? What do they see?	Are they compliant?	GDPR	What is their privacy policy?
	Outlook, Contacts, Calendar, SharePoint. They store our files on their servers so can access notes, presentations, meeting minutes, contracts. However, files are private for the exclusive use of the account owner, Upskill Enterprise.			
HubSpot	As a central relationship management system to store contact details, leads, notes on areas of interest, send group emails, keep copies of sent emails and responses in conversational threads. They can see the individual's work contact details however records are private for the exclusive use of the account owner, Upskill Enterprise.	Yes		https://legal.hubspot.com/privacy-policy
FreeAgent	As an accounting system to track invoices and bills, with records of contacts, billing details and completed payments. They can see the individual's invoicing details and amounts spent and received. Accounts are private for the exclusive use of the account owner, Upskill Enterprise.	Yes		https://www.freeagent.com/website/privacy/
SurveyMonkey	To run online surveys on dedicated subject matters. A link is produced to share with contacts and no contact information will be uploaded into SurveyMonkey. They capture respondents IP addresses and we will typically ask for name, email address, company name and company sector. Also sometimes role title. This data is captured within SurveyMonkey and deleted from here at the end of the related research topic or project. Surveys are private for the exclusive use of the account owner, Upskill Enterprise.	Yes		https://www.surveymonkey.com/mp/legal/privacy-policy/
123 Forms	We use this to create web forms on our website and through newsletter. It also supports online sales. We use this to process business sales and to generate contact leads. They can see the data you enter on any forms on our website. Forms are private for the exclusive use of the account owner, Upskill Enterprise.	Yes		https://www.123formbuilder.com/privacy.html

Name of third party	Why do you use them? What do they see?	Are they compliant?	GDPR What is their privacy policy?
Form Builder by POWr	We use form builder as a plugin app for requesting applications to initiatives run by Upskill Enterprise. They can see the data you enter on any forms on our website. Forms are private for the exclusive use of the account owner, Upskill Enterprise.	Yes	https://www.wix.com/app-market/form-builder-plus/developer
Elaura	Are a partner organisation who's psychometrics product plugs in to Upskill's WorkForce Triage system. They see anonymised data on responses to the Workforce Triage to improve sectoral awareness and develop their service further. Upskill can access anonymised data about the results of the psychometrics analysis when completed through WorkForce Triage in order to improve our services. Elaura is based in Singapore and transfer of data is via secure servers and encrypted devices only.	Yes	https://elaura.com/privacy

Marketing communications

Upskill Enterprise doesn't send out regular marketing communications to sell products and services. Occasionally we may promote a special offer on one of our services but intend to make sure this happens no more than four times a year as a direct communication. You may see offers within e-newsletters along with other pieces of news, opinion pieces, policy updates etc. We never give your details to any marketing or advertising third parties to promote to.

Does anyone else get to see my data?

In the course of normal business activities others hired by Upskill Enterprise may see some or all of your data. This includes:

- Our accountant who helps with our annual tax return will have access to our invoices and remittance advice. Our accountant is based in Northern Ireland and subject to complying with GDPR.
- Legal advisors give us information about intellectual property rights and regarding some contract. They may see information about clients in the course of contracting for our services which we will openly communicate with the client during the contracting period. Our legal advisors are based in Northern Ireland and subject to complying with GDPR.
- As of release of this policy, 25/05/18, Upskill does not use any formal affiliates services or websites to advertise our business. Should this change our privacy policy will be updated with a new version available on our website.
- Upskill Enterprise is building partnerships with several businesses who provide a service which is complementary to ours. This is specifically for our WorkForce Triage service where Service Users subscribe to the service we will share data with them which they provide as an add-on feature or in connection with WorkForce Triage. These partners are as follows, their privacy policies are provided in the section, and the list will be added to as partners join our services:
 - Elaura: providers of psychometrics: based in Singapore: <https://elaura.com/privacy> .
- Upskill Enterprise has a database of approximately 12 associates who we hire as independent contractors based on their area of expertise required for individual projects. They have to comply with

Upskill Enterprise policies, client policies and GDPR. Associate CVs will be included in any submissions or tenders for contracts.

- To date we have never needed to share information with our insurers, but should we need to make a claim then they may expect to see some client details and/or contracting information. Our insurers are based in Northern Ireland and subject to complying with GDPR.
- If Upskill Enterprise is approached as part of a merger, acquisition or takeover whether exploratory or confirmed, then some information will be shared with the potential buyer and their legal team. Where possible information will be anonymised.

You've said you will disclose my data if required for legal reasons.

What legal reasons does this include?

As a responsible business Upskill Enterprise must contact the appropriate authority if there is a suspicion or confirmed incident of cyber crime or fraud or malicious communications. This includes against us or third parties we are working with. Should we be subject to a court order for your information we will follow the common law of the United Kingdom in responding and sharing this information.

GDPR is about giving me more rights about use of my data. What are my rights regarding Upskill Enterprise using my data?

You can ask us at any time to tell you how your data is being used. You can email Rowena, our Data Controller, at rowena@upskillenterprise.com or in writing to Upskill Enterprise, Innovation Centre, Queens Road, Titanic Quarter, Belfast, BT3 9DT, United Kingdom. There are some limitations but essentially what you can to see includes:

- To ask to see your information, how we use it and how we process it
- To ask for changes to how we use your data
- To ask for the right to be forgotten including completely removing or partial removing your data including opting out of marketing communications
- An easy to understand common format for any of your data
- To ask us to transfer your data to other data controller/s
- To complain about the processing of your data
- To ask questions about the consent you have given, and to potentially remove the consent at any time

We recommend you look at the full explanation on your rights by visiting the ICO website: <https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/>; <https://ico.org.uk/for-the-public/is-my-information-being-handled-correctly/>

If you do request to see your data, Upskill Enterprise must legally take any actions needed to verify your identity to avoid identity fraud. We may ask questions based on your file or request documentation to do so.

What do you do to keep your Privacy Policy up to date?

Upskill Enterprise will review our Privacy Policy on an annual basis in the month of May each year. If there is a change to the way we process, store and use your data we will make ad-hoc updates which are clearly identifiable on our website e.g. via a banner or notification on the landing page.