

NBI Partnership - Privacy Policy

This policy sets out how we deal with the personal information of our academic/non-academic collaborators, suppliers, visitors, collected directly by the NBI Partnership and/or on behalf of the Norwich Bioscience Institutes.

This notice may be updated from time to time to ensure continued compliance with current legislation and to reflect best practice.

Identity of the Data Controller's:

The NBI Partnership Limited (NBI-P) solely provides non-scientific services to the Norwich Bioscience Institutes. (NBI)

What personal information do we collect about you?

The following gives an indication of the types of information NBI-P collect and process:

For academic/non-academic collaborators, suppliers, visitors:

- your name,
- email address,
- Institute, company name, affiliation.

When you visit our websites, use any authorised online service administered by the NBI-P

- your username
- IP address.

We collect this information in a variety of ways. For example, data might be collected using forms on our website, while registering as a service provider with us, when requested by the institute to setup a computing account. Certain information such as IP address may be collected automatically when using any of our services.

We will also hold information supplied by third parties e.g. when collaboration agreements are setup on behalf of the institute.

What are our legal bases for processing your personal data?

There are a number of legal ways in which NBI can process your data, the most relevant of which are set out below:

Legal basis	Explanation
(1)	When you apply to funding bodies with any of the institutes (NBI) or to take part in any partnership training programs, we will be required to collect, store, use and otherwise process information about you for any purposes connected with support, research, administration, your health and safety and for other reasons deemed necessary for the purpose of entering into or for the performance of your contractual agreement . See GDPR Article 6(1)(b)
(2)	Processing of your personal data may also be necessary for the pursuit of our legitimate interests or by a third party's legitimate interests – but only where the processing does not fall within our core functions, is not unwarranted and will not cause a prejudicial effect on your rights and freedoms, or legitimate interests. See GDPR Article 6(1)(f) .
(3)	Processing of your personal data is necessary for the performance of a task carried out in the public interest (see GDPR Article 6(1)(e)) and for statistical and research purposes.
(4)	Processing is necessary for compliance with a legal obligation to which the Data Controller is subject.
(5)	Processing of Special Categories data is necessary for statistical and research purposes in accordance with Article 89(1) based on the duties in the Equality Act 2010 (see GDPR Article 9(2)(j))
(6)	We will obtain consent from you in order to use your information beyond any purposes described above GDPR Article 6(1)(a)

For what purposes will your information be used?

The purposes and related legal basis (number in brackets) under which NBI-P may process your personal data, (although given the complexity of the relationships that the Institutes have, this is not exhaustive):

- administration (1)
- To setup suppliers, collaborator accounts on our system and provide you with information and updates (1,2)
- internal and external auditing purposes (2,5)
- compliance with requisite legal obligations e.g. Health and safety and general site security. (2,4)
- carrying out statutory duties to provide information to external agencies [see 'the sharing section of this policy' for further details] (1,2)
- providing information for enquiries or general contact made via email, contact form, events. (6)
- authenticate access to resources. (2)

- record your IP address when accessing our website and when using NBI-P or NBI resources, usernames stored in logs to be able to comply with law and protect NBI resources. (2,4)
- from time-to-time, other activities that fall within the pursuit of the Institutes legitimate business and do not infringe your rights and freedoms (2)

Sharing information with others:

We (NBI-P) may share your relevant personal data with external organisations.

Disclosure to	Details
Norwich Bioscience institutes (NBI)	As part of our primary function as a shared service for the Institutes (NBI): For administrative activities such as Finance (expenses reimbursement, studentship payments, joint contract administration), IT (for computer, email accounts, manage/store visiting worker/student records), Contracts, CCTV for site, health and safety procedures.
Funding bodies	To fulfil the terms of bodies providing the funding for awards, primarily the UKRI-BBSRC.
Sponsors where a contract exists with you.	In accordance with the terms of the contract (which could include, for example, industrial CASE studentship non-academic partners, professional internship hosts.)
Other institutions within the NRP.	Where you are registered, project is jointly funded, or supervisors are based at one or more of the other institutions within the NRP, as per applicable terms and conditions of your visiting status/studentship or appropriate contract.

Any other disclosures that NBI-P makes will be in accordance with Data Protection law and your interests will always be considered.

We use a range of third-party service providers to manage our website, emails.

Emails are based in Microsoft O365 cloud offering, managed by NBI's shared service provider. [Microsoft's privacy statement](#).

How long your information will be held:

In principle, NBI-P will only hold the data it collects for the duration it is required after which it is either deleted or anonymised.

For most areas such as: administration, human resource records, communications with students, records are stored for, up to 7 years after the completion of your association with the institutes/studies

Names of scientists and any collaborators that are linked to research data produced may be stored indefinitely as such is required to ensure the integrity of this data is not lost and is required for future scientific review processes.

General communication enquiries are deleted after 12 months or once they are complete and no longer required, whichever comes first.

Certain areas such as scientific or public engagement, grant awards, records will be anonymised to allow statistical analysis for reports to reports to funding bodies.

Security of your information:

Data Protection legislation requires us to keep your information secure. This means that your confidentiality will be respected, and all appropriate measures will be taken to prevent unauthorised access and disclosure. Only members of staff who need access to relevant personal data will be authorised to do so. Information about you stored or shared electronically will be subject to additional security measures such as password and other restrictions, while paper files will be stored in secure areas with controlled access.

Your data protection rights:

Under Data Protection legislation you have rights. They are, right to be informed, right of access, right to rectification, right to erasure/to be forgotten, right to restrict processing, right to data portability, right to object and rights in relation to automated decision making and profiling.

For further details on what these rights cover/mean, please refer to the ICO's advisory here: <https://ico.org.uk/for-organisations/guide-to-data-protection/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/>

To exercise any of these rights or request a copy of your personal data, please see contact details below:

a) For your personal data related to any services provided by the NBI-P or your interactions with us:

dpa@nbi.ac.uk

b) For your personal data related to your data held by the NBI:

John Innes Centre / Quadram Institute Bioscience: dpa@nbi.ac.uk

Earlham Institute: dpo@earlham.ac.uk

The Sainsbury Laboratory: dpo@tsl.ac.uk

Do we transfer information outside the European Economic Area (EEA)?

Generally, information you provide to us is stored on NBI-P's secure servers, or on our cloud-based systems which are located within the EEA. However, there are times when we do need to store information outside the EEA. If we transfer your information outside the EEA, we will take steps to ensure that appropriate security measures are taken to protect your privacy rights. This could be by imposing contractual obligations on the recipient of your personal information or ensuring that the recipients are subscribed to

'international frameworks' that aim to ensure adequate protection. For example, we would ensure that a supplier based in the USA has signed up to "[Privacy Shield](#)". Technical measures such as encryption will also be considered.

[How to raise a query, concern or complaint](#)

If you still have queries, or concerns regarding the processing of your personal information, please contact us using details in the "Your data protection rights" section.

We will be more than happy to discuss these with you.

If you wish to raise a complaint with the Information Commissioner's Office details on how to do so are available on the [ICO's website](#).

Revised: Jan 2020