

## Privacy Notice for the Strategic Investment Board Ltd

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### The Data Controller

Strategic Investment Board Limited  
5<sup>th</sup> Floor, Nine Lanyon Place  
Belfast  
BT1 3LP

### The Data Protection Officer

Sam Pringle, Data Protection Officer  
Strategic Investment Board Limited  
5<sup>th</sup> Floor, Nine Lanyon Place  
Belfast  
BT1 3LP  
Direct tel: +44 (0)28 9025 0965  
Tel: +44 (0)28 9025 0900 (Ext: 50965)  
Email: [dataprotectionofficer@sibni.org](mailto:dataprotectionofficer@sibni.org)

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This privacy notice tells you about the collection of personal information by the Strategic Investment Board (SIB). It explains how SIB uses personal information and the ways in which SIB protects privacy.

The data controller for personal information is SIB. SIB has appointed a data protection officer and their contact details are given at the beginning of this notice.

This privacy notice takes account of the provisions of the General Data Protection Regulation (GDPR) and the Data Protection Act 2018, which came into effect on 25<sup>th</sup> May 2018. It also takes account of the changes following the UK leaving the EU. You can find more information about privacy on the [Information Commissioner's Office \(ICO\) website](#).<sup>1</sup>

## Personal Data Held

SIB holds the following categories of personal information:

- Details of its Board Members and employees to support its payroll functions.
- Details relating to its employees to support its HR (Human Resources) functions, including details of next-of-kin.
- Information and other details to support recruitment, which includes successful and unsuccessful candidates for positions, and personal information relating to contact details for referees who are provided to us by a candidate.
- Information collected for the BuySocial initiative that is supported by SIB. This includes details of trainees who gain training and/or employment through Buy Social, of brokerage organisations and of people who have signed up to the Buy Social newsletter. (More information can be found on the [BuySocial](#) website.<sup>2</sup>)
- Information collected for other projects that SIB undertakes or supports.

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<sup>1</sup> <https://ico.org.uk/your-data-matters/>

<sup>2</sup> <https://buysocialni.org/>

- Information required for business contingency and emergency planning.
- Information collected through questionnaires and surveys that it carries out from time-to-time.
- Information to support and facilitate training.

In connection with some of the above, SIB may also process sensitive classes of information that include; physical or mental health details, racial or ethnic origin, religious or other beliefs of a similar nature, and trade union membership.

## **What SIB Does with Personal Data**

SIB collects and processes personal information to carry out its public tasks, in order to meet its legal obligations and legitimate interests, to deliver its services, to maintain its accounts and records, to support and manage its employees, and for the purposes of litigation and legal advice.

SIB also processes personal information for the purposes of detection and investigation of suspected or actual fraud, loss or crime, data matching under the National Fraud Initiative and as required by other legislation.

SIB will only collect and hold the minimum amount of personal data necessary for the purpose.

SIB may also collect information through voluntarily completed surveys or participation in consultations managed directly, on behalf of clients or on its own behalf.

## **Use of Website Cookies**

SIB may use cookies to collect information on some websites. If this is the case, there will be more information on that website about its cookie policy.

## **How SIB Obtains Personal Data**

SIB obtains personal information directly from individuals or, where appropriate, from other sources, such as Government Departments. SIB may also obtain personal data from publicly accessible sources.

## **Who SIB May Share Personal Data With**

In many cases, SIB will not disclose personal data without your consent. However, in appropriate cases – e.g. to meet its legislative or public function requirements, to pursue debt, for fraud or crime prevention and detection purposes, to process benefits, or in your vital interests – SIB may share personal data with the following:

- Your family, next-of-kin, associates or representatives
- Employment and recruitment agencies
- Current, past and prospective employers
- Educators and examining bodies
- Central government
- Local government
- Credit reference agencies
- Suppliers and service providers, including providers of training
- Debt collection and tracing agencies

- Financial organisations
- Courts, tribunals and parties to litigation
- Police forces
- Emergency responders
- The national archives in considering whether information is subject to the archiving in the public interest purpose.

## How SIB Uses Personal Information

All the personal data SIB uses is processed within the European Economic Area (EEA) or covered by data adequacy agreements.

Should it become necessary to transfer personal information outside the EEA, SIB will make any transfers in full compliance with all aspects of data protection legislation.

## How Long Does SIB Keep Personal Data?

SIB keeps personal information as long as it is necessary, and in line with its Retention and Disposal Schedule. When personal information is no-longer required it will be destroyed securely.

## What Are Your Rights?

You have rights under the UK General Data Protection Regulation that are described below. In all cases, to make a request to SIB regarding personal information that it holds on you, or to raise an objection about the processing SIB carries out, you should make a request in writing to the SIB Data Protection Officer and:

- Either email it: [dataprotectionofficer@sibni.org](mailto:dataprotectionofficer@sibni.org).
- Or write to the address at given at the beginning of this privacy notice.

You can find out more about these rights at the [ICO's website](https://ico.org.uk).<sup>3</sup> You have rights to:

### **1. Be Informed**

SIB publishes this privacy notice for that purpose.

### **2. Access**

SIB tries to be as open as possible in terms of giving you access to your own personal data. You can find out if SIB holds any personal information on yourself by making a "subject access request". You can find out how to request your personal information at the [ICO's website](https://ico.org.uk).

If you make a request and SIB does hold personal information about you, SIB will:

- Give you a description of it.
- Tell you why SIB is holding it.
- Tell you who the personal information could be disclosed to.
- Provide you with a copy of your personal information in an intelligible form.

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<sup>3</sup> <https://ico.org.uk/your-data-matters/>

SIB may need further clarify to what information you are seeking in order to facilitate your request.

### ***3. Rectification***

If you believe the information that SIB holds on you is inaccurate or incomplete, you have the right to ask SIB to correct it.

### ***4. Erasure***

This is also known as “the right to be forgotten”, although it is not an absolute right. In certain cases you can request the deletion or removal of your personal data where there is no compelling reason for its continued processing.

### ***5. Restriction of Processing***

If you are not entitled to require SIB to erase your personal data you may be entitled to limit the purposes for which the SIB can process those data: i.e. to restrict processing. In cases where processing is restricted, SIB is permitted to store the personal data, but not further to process it. SIB can retain just enough information about you to ensure that the restriction is respected in future.

### ***6. Portability***

You have the right to transfer your personal data between data controllers: e.g. to move your account details from SIB to another one online platform.

### ***7. Objection to Processing***

SIB must have a lawful basis for processing your personal data. Where that lawful basis is either “public interest” or “legitimate interests”, those lawful bases are not absolute, and you may have a right to object to such processing. SIB is obliged to consider you request but not necessarily to comply. However, SIB will respond with justifications for its decision.

You have the absolute right to object to direct marketing.

### ***8. Automated Decision Making***

You have the right not to be evaluated in any material sense solely on the basis of automated processing of your personal data (and SIB does not do this), subject to certain exceptions.

## **Complaints**

If you are not satisfied with SIB’s response to your request or inquiry or if you believe SIB is not processing your personal data in accordance with the law, you can complain to the Information Commissioner.

You can contact the ICO either by email – [casework@ico.org.uk](mailto:casework@ico.org.uk), or in writing to the following address:

Information Commissioner’s Office

Wycliffe House  
Water Lane  
Wilmslow  
Cheshire  
SK9 5AF

## **Changes to this Privacy Notice**

SIB keeps its privacy notice under regular review: the footer on each page shows when it was last updated.

