



QMS - K09

Privacy Policy

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Website Privacy Policy

Introduction

Mentera understands that the information you trust us with is important to you, and we are committed to protecting and respecting your privacy, as well as clearly stating how the information we gather is used to deliver our service to you.

Aim

This privacy policy aims to give you information on how Mentera collects and processes your personal data through your use of this website (mentera.cymru), including any data you may provide through this website when you take part in a survey.

Summary

- Mentera is a not for profit company and therefore we do not aim to profit from the data we store.
- We will not sell or share your personal information with any third-party marketeers.
- We will protect all personal information using appropriate organisational and technical controls.
- We will only retain your data for as long as it is necessary.
- You have the right to request a copy of the personal information we hold about you and to suggest corrections or deletions.

Controller

Mentera is the controller and responsible for your personal data (collectively referred to as “we”, “us” or “our” in this privacy policy).

If you have any questions or concerns about Mentera’s policies and practices for handling your personal data, please contact us by e-mail at dpo@mentera.cymru or by post at DPO Officer, Mentera, Uned 3 Y Parc Gwyddoniaeth, Aberystwyth, Ceredigion, SY23 3AH

You have the right to make a complaint at any time to the Information Commissioner’s Office (ICO), the UK supervisory authority for data protection issues (ico.org.uk). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

Information we may collect from you

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may collect, use, store and transfer the following information:

- Identity data including your first name, maiden name, last name, username or similar identifier, marital status, title, date of birth, gender and name of your company.
- Your contact data including email address, postal address and telephone number.
- Data you send to us via this website, including information you provide through surveys on our website, or other written information that relate to an enquiry.
- Website usage data which includes information about how you use our website.
- Technical data including internet protocol (IP) address, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, and other technology on the devices you use to access this website.
- Marketing and communications data which includes your preferences in receiving marketing from us and your communication preferences.

We gather and use personal information about individuals who:

- Contact us using post, phone, email or otherwise;
- Use Mentera ICT Systems;
- Complete a registration form via our website for one of our programmes;
- Enter a survey via our website;
- Subscribe to our services or publications;
- Request marketing to be sent to them;
- Use our website – as you interact with our website or our ICT systems, we will automatically collect technical data about your equipment, browsing actions and patterns. We collect this personal data by using cookies and other similar technologies.

Data received from third parties

We may receive personal data about you from the following third parties:

Google – we use Google Analytics which is a web analytics service offered by Google;

The Rocket Science Group, LLC – who operate Mailchimp. We use Mailchimp to manage email marketing subscriber lists and send emails to our subscribers.

The Welsh Government (WG) – where we have partnered with the WG or the WG have contracted us to provide a particular programme.

How we use your personal data

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

Where we need to perform the contract we are about to enter into or have entered into with you.

Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.

Where we need to comply with a legal obligation.

We have set out overleaf, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Purpose/Activity	Type of Data	Lawful basis for processing including basis of legitimate interest
<p>To register you as:</p> <p>(a) a new client or subscriber; or</p> <p>(b) attendee of an event</p>	<p>(a) Identity</p> <p>(b) Contact</p>	<p>(a) Performance of a contract with you</p> <p>(b) Necessary for our legitimate interests (to run our business and keep our records updated)</p>
<p>To send you details of any events you may be attending</p>	<p>(a) Identity</p> <p>(b) Contact</p>	<p>(a) Performance of a contract with you</p> <p>(b) Necessary for our legitimate interests (to keep our records updated)</p>
<p>To manage our relationship with you including notifying you about changes to our terms or privacy policy</p>	<p>(a) Identity</p> <p>(b) Contact</p> <p>(c) Marketing and Communications</p>	<p>(a) Performance of a contract with you</p> <p>(b) Necessary to comply with a legal obligation</p> <p>(c) Necessary for our legitimate interests (to keep our records updated and to improve our services)</p>
<p>To enable you to complete a registration form or survey</p>	<p>(a) Identity</p> <p>(b) Contact</p> <p>(c) Usage</p> <p>(d) Technical</p> <p>(e) Marketing and Communications</p>	<p>Necessary for our legitimate interests (to run our business, provision of administration and IT services, to develop our business)</p>
<p>To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)</p>	<p>(a) Identity</p> <p>(b) Contact</p> <p>(c) Technical</p>	<p>(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security and fraud prevention)</p> <p>(b) Necessary to comply with a legal obligation</p>

Purpose/Activity	Type of Data	Lawful basis for processing including basis of legitimate interest
To deliver relevant website content	<ul style="list-style-type: none"> (a) Identity (b) Contact (c) Usage (d) Marketing and Communications (e) Technical 	Necessary for our legitimate interests (to keep our website updated and relevant, to develop our business and to inform our marketing strategy)
To use data analytics to improve our website, services, marketing, client relationships and experiences	<ul style="list-style-type: none"> (a) Technical (b) Usage 	Necessary for our legitimate interests (to develop our services, grow our business and to inform our marketing strategy)
To make suggestions and recommendations to you about services or events that may be of interest to you and to contact you for market research	<ul style="list-style-type: none"> (a) Identity (b) Contact (c) Technical (d) Usage (e) Marketing and Communications 	Necessary for our legitimate interests (to develop our services and grow our business)

Storing Information

We always hold your information securely.

To prevent unauthorised disclosure or access to your information, we have implemented strong physical and electronic security safeguards to ensure, as far as reasonably possible, the confidentiality of your information at all times.

Any personal information we hold about you is stored and processed in accordance with relevant data protection legislation.

Google analytics & re-marketing

Our websites use Google analytics and Google's re-marketing technology. This technology enables users who have already visited our online services and shown interest in our services to see targeted advertising on Google partner network websites. Likewise, users that are similar to the visitors of our websites can be addressed. The advertising will be displayed through the use of web cookies. Using cookies, the user behaviour on a website can be analysed and subsequently utilised to provide targeted product recommendations and advertising based on the user's interests.

If you would prefer to not receive any targeted advertising, you can deactivate the use of cookies for these purposes through Google. Alternatively, users can deactivate the use of cookies by third-party providers by visiting the Network Advertising Initiative's deactivation website. Please note that Google has its own data protection policy, which is independent of our own. We assume no responsibility or liability for their policies and procedures. For more information, please read Google's privacy policy: [How Google uses data](#)

Cookies

A cookie is a small text file that is added to the hard drive of your device by a web server within our domain. Cookies cannot be used to run software programmes or add a virus to your device. They are unique to you and avoid you having to input the same information and preferences each time you visit our website.

You can block cookies by activating the setting on your browser that allows you to refuse the setting of all or some cookies. However, if you use your browser settings to block all cookies you may not be able to access all or parts of our website.

Disclosures of your personal data

We may share your personal data with the parties set out below for the purposes set out in the table:

- Service providers who provide IT and system administration services and general business support.
- Professional advisers including lawyers, accountants and insurers who provide consultancy, banking, legal, insurance and accounting services.
- The Welsh Government, HM Revenue & Customs and other authorities based in the United Kingdom who require reporting of processing activities in certain circumstances.
- Organisations contracted by the Welsh Government to deliver a particular service and/or programme.

We shall only share personal information with trusted third parties where we have the appropriate contracts and controls in place, which will have taken into account their information handling processes.

Links to external websites

Our website may contain links to third party websites. We are not responsible for the content of other websites, or for the protection or privacy of data you submit to them. This privacy notice only applies to the Mentera website.

Marketing

We may use your personal data, including data received from third parties, to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which products, services and offers may be relevant for you.

You can ask us to stop sending you marketing messages at any time by following the opt-out links on any marketing message sent to you or by contacting us at any time.

Your legal rights

You have the right to:

- **Request access to your personal data** (commonly known as a “data subject access request”). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
- **Request correction of the personal data** that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.
- **Request erasure of your personal data.** This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.
- **Object to processing of your personal data** where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms.
- **Request restriction of processing of your personal data.** This enables you to ask us to suspend the processing of your personal data in the following scenarios:
 - If you want us to establish the data’s accuracy.
 - Where our use of the data is unlawful but you do not want us to erase it.
 - Where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims.
 - You have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

- **Request the transfer of your personal data** to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.
- **Withdraw consent at any time** where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent.

If you wish to exercise any of the rights set out above, **please contact us at dpo@mentera.cymru**

Or send a letter to:

DPO Officer, Mentera, Uned 3 Y Parc Gwyddoniaeth, Aberystwyth, Ceredigion, SY23 3AH

We will aim to respond within 10 working days and provide the information within 28 days.

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we could refuse to comply with your request in these circumstances.

Complaints

We work hard to ensure that your personal information is treated appropriately and would always welcome the opportunity to rectify any complaints that you may have about your data held within Mentera and again you can contact us using the details outlined above.

Retaining your data

Mentera, and the information we retain about you is subject to some regulatory and legal requirements. Our aim is not to keep your personal information for any longer than we have to for us to fulfil our obligations to you. If your data needs to be retained, we will ensure that the appropriate security and organisational measures are put in place to protect the use of your data.

International transfers

The majority of our company's activity is within the UK and we therefore operate under the auspices of the ICO – the lead data protection supervisory authority within the UK.

We do hold some personal information data relating to businesses in other EU and non-EU countries. This information is not held to benefit our company but in respect of developing business opportunities for Welsh companies in other countries. This information will be protected using our same stringent protocols.

Some of our third-party suppliers are based outside the European Economic Area; so their processing of your personal data may involve a transfer of data outside the EEA.

Please note that some countries outside the EEA may not have similar safeguards in place regarding protection and use of your data as those inside the EEA. Therefore, if we do transfer your personal data to countries outside the EEA, we will comply with the relevant legal rules governing such transfers and take reasonable steps to ensure that your data is treated securely.

Changes to our policy

We will review our Privacy Policy regularly and will inform you of any updates through our website and appropriate communication channels.