

This privacy notice describes how we collect and use personal information about you during and after your working relationship with us, in accordance with data protection legislation. It applies to all current and former employees, workers and contractors and does not form part of any contract of employment or other contract to provide services.

It is important that you read this notice, together with any other privacy notice we may provide on specific occasions when we are collecting or processing personal information about you, so that you are aware of how and why we are using such information.

### **Who we are?**

The TRANSFORM-CE project is an Interreg North West Europe funded project led by Manchester Metropolitan University in partnership with 8 other partners across NW Europe (the TRANSFORM-CE partners): Materia Nova (BE), SOENECS (UK), Municipality of Almere (NL), Save Plastics (NL), TU Delft (NL), Hogeschool Utrecht (NL), HS Trier/IfaS (DE) and bCircular (DE).

The TRANSFORM-CE partners are committed to protecting the privacy and security of your personal information.

The TRANSFORM-CE partners are data controllers. This means that we are responsible for deciding how we hold and use personal information about you. We are required under data protection legislation to notify you of the information contained in this privacy notice.

### **What information does the TRANSFORM-CE Project collect?**

Personal data 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). There are special categories of more sensitive personal data, which require a higher level of protection.

The types of information we hold about you include:

- personal contact details such as your name, title, address, telephone numbers, email address and, where applicable, delivery address.
- evidence of your business's eligibility to be supported by the project

- information about the requested business support needs and potential provision and assistance suggested to/agreed with you.
- correspondence with or about you, for example emails or letters related to the business support requested or provided through our projects.
- information about your use of our information and communications systems.
- photographs for use in marketing.
- recordings of your attendance and participation in online/virtual webinars, meetings or workshops.

Most of the information we hold about you will have been provided by you or will have been held in TRANSFORM-CE partners' existing database for which you would have authorised the collection of such information (eg stakeholders supporting / promoting the project). Some may also come from other external sources and intermediaries, such as referrals from business support organisations, interest groups etc. or from the TRANSFORM-CE project's contact form from the project website.

Data will be stored in a range of different, secure places, including the TRANSFORM-CE shared IT platform (Sharepoint, only accessible to TRANSFORM-CE partners), the TRANSFORM-CE partners email system and/or individual TRANSFORM-CE partner organisations' internal storage file system.

### **The purposes of the processing / why does the TRANSFORM-CE project process personal data?**

This section includes an explanation of our lawful basis for processing. We will only use your personal information when the law allows us to and where you have provided consent for us to do so. The TRANSFORM-CE partners need to process data to enter into an agreement with you and to comply with our contractual obligations, for example, providing you with the agreed business support services, making claims to funders supporting the projects or undertaking many of the activities listed in the following

paragraph. It also needs to process your data in order to comply with legal obligations, for example, state aid legislation.

The TRANSFORM-CE partners also needs to process personal data to pursue its legitimate business interests. Processing personal data allows the project to:

- Develop and maintain databases of individuals and organisations described as beneficiaries, target groups and stakeholders in the project's approved grant application.
- operate and keep a record of support provided through and funded by the project.
- operate and keep a record of workshops, events, webinars, meetings, activities attended as part of the TRANSFORM-CE project activity, as required by the project funders.
- Disseminate the project's outcomes and results, by means of newsletters, e-mailings, invitations to project events, social media.
- provide referrals where applicable and appropriate to other business support agencies we believe could help you and your business.
- undertake business management and planning, including accounting and auditing.
- maintain contact with you to ascertain the impact and results of the support provided, and/or share the project results.
- obtain feedback and conduct evaluations to enable the development and improvement of the project.
- ensure network and information security and compliance with information and communication policies.
- maintain and promote equality in the workplace.

Where the TRANSFORM-CE project relies on legitimate interests as a reason for processing data, it has considered whether or not those interests are overridden by the rights and freedoms of employees and has concluded that they are not.

Some of the above grounds for processing will overlap and there may be several grounds, which justify our use of your personal information.

We will only use your personal information for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If we need to use your personal information for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so. Please note that we may process your personal information without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

We do not envisage that any decisions will be taken about you using automated means, however we will notify you if this position changes.

#### **Recipients / who has access to data?**

Your information will be shared with the TRANSFORM-CE partner organisations listed above, as well as the Interreg North West Europe Programme (funding body), and the TRANSFORM-CE partners' appointed First Level Controllers (FLCs) auditing the partners' financial claims and project activity.

We will only disclose information about you to third parties if we are legally obliged to do so or where we need to comply with our contractual obligations, for instance we may need to pass on certain information about you to other relevant funding bodies (for example, the European Commission), the European Court of Auditors or appointed Second Level Controllers.

We do not send your personal data outside the European Economic Area. If this changes in the future, you will be notified of this and the safeguards in place to protect the security of your data.

#### **How does the TRANSFORM-CE project protect data?**

The TRANSFORM-CE partners take the security of your data very seriously and has internal policies and controls in place to try and ensure that your data is not lost, accidentally destroyed, misused, or disclosed, and is not accessed except by its employees in the performance of their duties. They will only process your personal information on our instructions, and they are subject to a duty of confidentiality. For more information, please

contact the TRANSFORM-CE partner based in your country of residence (contact details below).

Where the TRANSFORM-CE partners ask third parties to process data on its behalf, for example consultants or evaluators, they do so on the basis of written instructions, are under a duty of confidentiality and must ensure that they have appropriate technical and organisational measures in place to keep the data secure.

The TRANSFORM-CE partners have put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

#### **Data retention / how long does the Help to Grow Programme and University keep data?**

We will only retain your personal information for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, contractual or reporting requirements. Your personal data will be stored throughout your involvement with the TRANSFORM-CE project, and for a period afterwards: due to funding requirements, Interreg North West Europe funded projects need to retain data **until at least 31<sup>st</sup> December 2026** or until notified by the funders that records can be destroyed. In addition, all state aid relevant documents, including containing your personal data, must be kept 10 years after the aid has been granted.

In some circumstances, we may anonymise your personal information so that it can no longer be associated with you, in which case we may use such information without further notice to you. Once project records are no longer required contractually and/or for statutory purposes, we will securely destroy your personal information in accordance with our data retention policy.

#### **What if you choose not to provide personal data?**

Certain information, such as contact details, are required to allow the TRANSFORM-CE partners to enter into a contractual relationship with you as project funding streams have eligibility criteria that must be complied with.

You have certain obligations under your beneficiary contract to provide the TRANSFORM-CE project with data. For example, to ascertain eligibility to access state aid support; ascertain previous state aid awards etc.

### **Your duty to inform us of changes**

It is important that the personal information we hold about you is accurate and current. Please keep us informed if your personal information changes during your working relationship with us.

### **Data subject rights**

As a data subject, under data protection legislation, you have various rights in relation to your personal data. You can:

- request access to your own data by making an access request – this enables you to receive a copy of the personal information we hold about you and check that we are lawfully processing it.
- request that we correct any inaccuracies in the data that we hold about you.
- request that we erase your personal data where we are not entitled by law to process it or it is no longer needed for the purpose it was collected.
- request that processing of your data is restricted – this enables you to ask us to suspend the processing of personal information about you, for example if you want to establish its accuracy or the reason for processing it.
- object to processing / opt out from our processing of your personal information where we are relying on our legitimate interests as our lawful basis to collect and hold your personal data.
- request the transfer of your personal information to another party.

In most situations, we will not rely on your consent as a lawful basis for processing your data. If we do request your consent to process your data for a specific purpose, you are under no obligation to provide it and you

have the right to withdraw that consent at any time. This will not affect the lawfulness of processing before your consent was withdrawn.

**If you wish to assert any of the data subject rights detailed above, including withdraw your consent or opt out from processing, please email [circulareconomy@mmu.ac.uk](mailto:circulareconomy@mmu.ac.uk) with your request.**

### **Right to lodge a complaint with the supervisory authority**

You have the right to lodge a complaint with the relevant authority of your country of residence (in the UK, the Information Commissioner's Office (ICO) is the supervisory authority in respect of the processing of your personal data). We would encourage you to expend your internal complaint procedure initially through the contact of the TRANSFORM-CE partner of your country of residence (please see below) and/or Manchester Metropolitan University Data Protection Officer, prior to contacting the relevant authority.

If you wish to contact the ICO the following contact information can be used: [casework@ico.org.uk](mailto:casework@ico.org.uk) or telephone: 0303 123 1113. For any further contact information please see: <https://ico.org.uk/global/contact-us/>.

### **Contacting us**

For questions or concerns about this Privacy Notice or how we store and use your personal information, please contact the **TRANSFORM-CE partner of your country of residence in the first instance.**

- **Manchester Metropolitan University (TRANSFORM-CE project lead, UK)**

In the first instance - [circulareconomy@mmu.ac.uk](mailto:circulareconomy@mmu.ac.uk)

Project contact - Mathilde Vautier, Project Manager (Compliance),  
[m.vautier@mmu.ac.uk](mailto:m.vautier@mmu.ac.uk)

Data Protection Officer - The University's Data Protection Officer can be contacted using the [dataprotection@mmu.ac.uk](mailto:dataprotection@mmu.ac.uk) e-mail address or by calling 0161 247 3884 or in writing to: Data Protection Officer, Legal

Services, All Saints Building, Manchester Metropolitan University,  
Manchester, M15 6BH.

- **Materia Nova (Belgium)**

Partner contact: Olivier Talon, Scientific lead

[olivier.talon@materianova.be](mailto:olivier.talon@materianova.be)

Avenue Copernic, 3, 7000 MONS Belgium

- **SOENECS (United Kingdom)**

Partner contact: David Greenfield, CEO

[davidg@soenecs.co.uk](mailto:davidg@soenecs.co.uk)

30 Church Road, RH15 0AP Burgess Hill, Brighton

- **Municipality of Almere (Netherlands)**

Partner contact: Johan Splinter

[jjsplinter@almere.nl](mailto:jjsplinter@almere.nl)

Stadhuisplein 1, 1315 HR Almere

- **Save Plastics (Netherlands)**

Project contact: Save Plastics

[bram@saveplastics.nl](mailto:bram@saveplastics.nl)

Pontonweg 10, 1332 CA Almere

- **TU Delft (Netherlands)**

Project contact: Prof. Ruth Mugge

[r.mugge@tudelft.nl](mailto:r.mugge@tudelft.nl)

Landbergstraat 15, 2628 CE Delft

- **Hogeschool Utrecht (Netherlands)**

Project contact: Malou van der Vegt

[malou.vandervegt@hu.nl](mailto:malou.vandervegt@hu.nl)

Padualaan 99, 3584 CH Utrecht

- **HS Trier / IfaS (Germany)**

Project contact: Daniel Oßwald  
[d.osswald@umwelt-campus.de](mailto:d.osswald@umwelt-campus.de)  
Postfach 1380, 55761 Birkenfeld

- **bCircular (Germany)**

Project contact: Tobias Gruben  
[t.gruben@bCircular.de](mailto:t.gruben@bCircular.de)  
Flur 1a, 55767 Achtelsbach, 70372 Stuttgart

**Changes to this privacy notice**

We reserve the right to update this privacy notice at any time, and we will provide you with a new privacy notice when we make any substantial updates. We may also notify you in other ways from time to time about the processing of your personal information.