

## Privacy Notice for City of York Scoping

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### Important details about Winning Moves

Established in 1995, Winning Moves Ltd undertakes research and evaluation for government, publicly funded and other organisations. We primarily operate as a Data Processor – however, on occasion, we may operate as Data Controller (either singularly or jointly) depending on the nature of our work.

- Company number | 03069806
- Address | Winning Moves, 102 Colmore Row, Birmingham, B3 3AG, England
- Phone | 0121 285 3800
- Email | [info@winningmoves.com](mailto:info@winningmoves.com)
- Information Commissioner's Office Registration no | Z6399957

#### *Our commitment to your privacy*

Winning Moves Ltd takes your privacy very seriously and we are committed to protecting your personal information and the information you provide whilst conducting research with us. Please read this Privacy Notice carefully and contact us with any questions.

#### *We are committed to meeting relevant laws, codes, registrations and standards*



The UK General Data Protection Regulation (GDPR)



Data Protection Act 2018



Market Research Society (MRS) Code of Conduct



ISO20252:2019 – the International Quality Standard for Market, Opinion and Social Research



Information Commissioner's Office Registration no | Z6399957



Cyber Essentials

As a Market Research Society Company Partner, you can trust that your personal information will be treated with respect, and it will only be used for the purposes that we inform you about.

It is not our aim to sell or promote anything. We conduct market research using scientific methods and we commit, in obtaining your co-operation, not to mislead you about the nature of the research or how the findings will be used. You can verify that we are a bona fide market research consultancy by contacting the Market Research Society (MRS) on freephone 0500 396 999.

## Purpose

### *Background*

The Green Economy programme, being delivered on behalf of York City Council by the Green Economy team within the Growth Company, aims to reduce carbon emissions and promote green business practice in the region. By increasing the amount of advice locally available to support decarbonisation, the programme provides help to businesses to plan and implement changes in the processes and technologies used.

As part of the programme delivery, Winning Moves (an independent subsidiary of Growth Company) is acting as 'critical friend' and evaluating the success of the Green Economy programme and identifying learnings for City of York council to take forward to possible related activities.

In order to evaluate the programme, we (Winning Moves) will need to process personal data of the supported businesses.

### *Data controller and data processors*

For the purposes of this project:

- City of York council is the data controller.
- Winning Moves is the data processor.

### *Type of data that will be processed*

For this project, we will process the following types of personal data:

- Simple data including the name of your business.
- Behavioural data including your experience with / thoughts / opinions / feedback on the programme.

### *How we get the personal data we process*

Personal data will be collected from you when you participate in the online survey. Links to the online survey will be sent from the Green Economy team who hold your contact details (and processed under a separate privacy notice).

### *The legal bases for processing your personal data*

Under the UK General Data Protection Regulation (UK GDPR), the lawful bases we rely on for processing this information is:

- **Consent:** prior to commencing the survey, we will explicitly seek your consent to collect and process your personal data. Informed consent is always collected by way of an

affirmative action (such as selecting 'next' to continue with an online survey). You can withdraw your consent at any time by emailing [dataprotection@winningmoves.com](mailto:dataprotection@winningmoves.com)

#### *How we will use your personal data*

Your personal data will be used in the following ways:

- Behavioural data you provide will be aggregated and reported anonymously to the City of York Council as our client. It should be noted that we will endeavour to make sure that you cannot be identified by any quotes or other responses, however, as the sample pool is small, this may not always be entirely possible.
- No automated profiling will take place, and we are not intending on linking any data.

#### *Will we share your personal data?*

Your personal data will be shared with the following third parties:

- Green Economy will receive a copy of anonymised responses. However, as above, it may not be entirely possible to ensure that businesses will not be identifiable from their responses.
- Our sub-processors who may carry out some of the processing on Winning Moves' behalf, and under Winning Moves control. An example of this might include the service provider who hosts our survey platform, IdSurvey.
- We may share your data with a third party purely for the purpose of delivering a function on our behalf. They will have access to personal information to perform the function, but will not use it for any other purpose.

Any third party must process the personal information as set out in this Privacy Policy and as permitted by the UK's Data Protection Act/laws.

#### *How we will keep your personal data*

Your information will be securely stored. We will protect the confidentiality of your information in accordance with our normal data handling procedures and all legal requirements. We will not use it for any purposes other than those which are set out in this Notice. We are committed to keeping personal data secure and take all reasonable technical and organisational measures to protect personal data from loss, misuse or alteration.

The length of time we hold your personal information varies depending upon the type of information and its use. We will hold your personal information on our systems only for as long as necessary to provide research services to our clients, and will anonymise data where possible, securely deleting personal data associated with it at the earliest possible point. For this project, we intend to keep raw survey data for six months following completion of the project – we expect this to be September 2025. We will then dispose your information by secure digital deletion.

#### *Where your personal data will be processed*

Your data will not be transferred or stored outside the UK or European Economic Area.

## Your Rights

Co-operation in research is voluntary at all times regardless of what the research is about or who our client is. You are entitled at any stage to ask that your personal data, or part or all of the record of your survey responses, be destroyed or deleted and we will carry out such a request. This can be requested during the interview itself or afterwards. You have the right to access any personal data that we process relating to you. We may ask for verification of your identity before releasing any information to you.

### *How to complain*

If you have any concerns about our use of your personal information, you can make a complaint to us:

Phone	Email	Address
0121 285 3800	<a href="mailto:dataprotection@winningmoves.com">dataprotection@winningmoves.com</a>	Winning Moves 102 Colmore Row Birmingham B3 3AG

You can also complain to the ICO if you are unhappy with how we have used your data:

Phone	Website	Address
0303 123 1113	<a href="https://www.ico.org.uk">https://www.ico.org.uk</a>	Information Commissioner's Office Wycliffe House Water Lane Wilmslow Cheshire SK9 5AF