

# Privacy Notice for Greater Manchester Combined Authority

## UKSPF Evaluation: E23

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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.

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- 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*

GM Business Growth Hub designs and delivers support for Greater Manchester businesses to help them drive performance and improve sustainability. This is done in part through funding from UK Shared Prosperity Fund (UKSPF) which is allocated by Greater Manchester Combined Authority (GMCA) – the lead authority for UKSPF in Greater Manchester. The UKSPF funded support is available to all businesses in Greater Manchester, but has particular ambition to strengthen local entrepreneurial ecosystems and supporting businesses at all stages of their development to start, sustain, grow and innovate, including through local networks. This is to benefit entrepreneurs looking to start in business, and businesses that are hard to reach (i.e. business types and / or entrepreneurs who do not typically engage in business support programmes).

GMCA have commissioned Winning Moves to evaluate Business Growth Hub's UKSPF funded support provision to find out in particular:

- Who has benefited from the support;
- What is the nature of the benefits received;
- Whether their ambitions have been achieved.

In order to deliver the evaluation, Winning Moves needs to process personal data of:

1. Beneficiaries of UKSPF funded business support. Personal data will relate to the owner / manager who has received the support through Business Growth Hub;
2. Stakeholders of Business Growth Hub (for example business advisors).

And the evaluation will include:

3. An online opt in survey with telephone calls to enhance participation, for business support beneficiaries, with the choice to consent to a longer, telephone qualitative interview at a later date;
4. A telephone qualitative interview with consenting stakeholders.

### *Data controller and data processors*

For the purposes of this project:

- GMCA is the data controller
- Winning Moves is the data processor.

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

#### For beneficiaries of UKSPF funded business support

We will process the following types of personal data:

- **Simple data** including your name, age range and contact details;
- **Behavioural data** including your thoughts, opinions and experiences with received support.

#### For stakeholders of Business Growth Hub

We will process the following types of personal data:

- **Simple data** including your name, age and contact details;
- **Behavioural data** including your thoughts, opinions and experiences with UKSPF funded support.

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

##### For beneficiaries of UKSPF funded business support

When you complete the online survey, you will be asked to share your thoughts and opinions with us your contact details. If you consent to take part in the follow up qualitative interview, we will explore your thoughts and opinions in more detail.

##### For stakeholders of Business Growth Hub

Your contact details will be shared with us by GMCA so we can arrange qualitative interviews with you. During the interview, we will collect your evaluation related thoughts and opinions.

#### *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 are:

- **Public task** – the contact details of stakeholders of Business Growth Hub have been shared with Winning Moves under the lawful basis of ‘public task’. This is so GMCA can ensure the funding is being used in the best interests of the residents and businesses within Greater Manchester.
- **Consent** – before starting an online survey or qualitative interview, you will be required to explicitly consent to participation.

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

##### Contact data

Contact data will be used in the following ways:

- To arrange qualitative interviews;
- To contact you for related follow up research (which will be voluntary, and consent would be sought at the time);
- For quality control purposes – we may contact you to validate your responses.

##### Behavioural data

Your thoughts and opinions will be combined with other survey responses and reported back to GMCA in an aggregated and anonymous format.

##### General

We will not use your data for automated profiling, however, it may be used to link to additional data supplied by GMCA under public task and detailed in its [UKSPF Privacy Notice v3](#).

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

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

- 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 all of your personal data for twelve months post completion of the evaluation. We expect this to be March 2026, after which we will dispose of 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:

<b>Phone</b>	<b>Email</b>	<b>Address</b>
<b>0121 285 3800</b>	<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