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**Service Area:** Education  
**Work Area:** Community Education (Adult Community Learning)  
**Contact Details:** 01495 233293  
LCBASIC@caerphilly.gov.uk  
**Privacy Notice Name:** Research – Digital Exclusion  
**Description of Privacy Notice:** This Privacy Notice will explain how we will use the information you provide when responding to surveys and focus groups relating to digital exclusion

## How we will use your information

### Purpose and legal basis for using your information

#### Purpose of processing

Digital exclusion is the inability to access online products or services, or to use simple forms of digital technology.

The purpose of this project is to gather information using surveys and focus groups, to help explore the reasons for digital exclusion e.g. skills, knowledge and/or equipment. All information provided will be collated together and anonymised (individuals will not be able to be identified) into a report.

This report will be used by Welsh Government and the relevant local authorities that form part of this project, to evaluate digital exclusion. This report may also be used for bids for future funding in relation to digital exclusion.

#### Legal basis for processing

In order for the processing of personal data to be lawful under the General Data Protection Regulations 2016, a valid condition from Article 6 of the Regulations must be identified, which is outlined below:

1f. processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data, in particular where the data subject is a child.

Data Protection legislation provides extra protection for certain classes of information called 'special personal data' e.g. equalities data. If any information falls within the definition of special personal data then an additional condition from Article 9 of the Regulations must be identified, as outlined below:

- 8 (1) This condition is met if the processing—
- (a) is of a specified category of personal data, and
  - (b) is necessary for the purposes of identifying or keeping under review the existence or absence of equality of opportunity or treatment between groups of people specified in relation to that category with a view to enabling such equality to be promoted or maintained, subject to exceptions.

## **Source and type of information being processed**

### **Categories of personal data obtained**

Caerphilly County Borough Council has obtained the following categories of your personal data:

- Name
- Contact details e.g. email address/telephone number
- Equalities data
- Information on your digital skills, knowledge and equipment
- Your learning experience in relation to digital skills and knowledge

### **Source of the personal data**

We may use your contact details from Caerphilly Adult Community Learning enrolment forms, to specifically invite you to join this survey/focus group.

However, the surveys and focus groups are open to all and all other personal data that we will hold on you would be provided by you as a participant of the survey/focus group.

## **Who will have access to your information**

### **Identity of Data Controller and Data Protection Officer**

The Data Controller for your information is Caerphilly County Borough Council. The Data Protection Officer is:

Ms Joanne Jones  
Corporate Information Governance Manager / Data Protection Officer  
Email: [dataprotection@caerphilly.gov.uk](mailto:dataprotection@caerphilly.gov.uk)  
Tel: 01443 864322

### **Details of main users of your information**

The main user of your information will be Caerphilly County Borough Council - Caerphilly Adult Community Learning.

However, as this is a joint piece of research with 5 other Local Authorities (Blaenau Gwent, Torfaen, Monmouthshire, Rhondda Cynon Taff & Vale of Glamorgan), who will all have access to the final report together with Welsh Government.

Individuals will not be able to be identified from this report. This report may also be shared with others e.g. when bidding for funding for digital exclusion projects, or other council teams who may benefit.

## **Details of any external data processors**

The surveys and focus groups will be run by Basis Ltd on behalf of Caerphilly County Borough Council. There will be a contract in place in order to limit and protect the use of your personal data.

## **Requests for information**

All recorded information held by Caerphilly County Borough Council may be subject to requests under the Freedom of Information Act 2000, Environmental Information Regulations 2004 and Data Protection legislation.

If the information you provide is subject to such a request, where possible Caerphilly County Borough Council will consult with you on its release. If you object to the release of your information we will withhold your information if the relevant legislation allows.

## **How long will we retain your information**

### **Details of retention period**

How long Caerphilly County Borough Council retains information is determined through statutory requirements or best practice.

We will not keep the views you express in a way that will identify you for longer than is necessary. We only envisage keeping the data in a way that individuals can be identified from it for a maximum of 3 months.

## **Your Rights (Inc Complaints Procedure)**

### **Your rights under the Data Protection**

Data Protection gives data subjects (those who the information is about) a number of rights:

- The right of subject access – Application forms for this process are available on our website: [SAR Form](#)
- The right to be informed
- The right of rectification
- The right to erasure
- The right to restrict processing
- The right to object
- The right to data portability
- Rights in relation to automated decision making and profiling.

Further information on your rights is available from: [www.ico.org.uk](http://www.ico.org.uk).

To enact your rights please contact the service area detailed on the top of this form.

### **Complaints Procedure**

If you are unhappy with the way that Caerphilly County Borough Council has handled your request / information, you have the right of complaint. Please contact the Service Area detailed at the top of this document outlining your issues.

If you remain unhappy you also have a right of complaint to the Information Commissioner's Office. Please follow this link for further information on the complaints process.

[www.caerphilly.gov.uk/My-Council/Data-protection-and-freedom-of-information/Questions-and-complaints](http://www.caerphilly.gov.uk/My-Council/Data-protection-and-freedom-of-information/Questions-and-complaints)

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# Summary Privacy Notice

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## How we will use your information

Caerphilly County Borough Council – Caerphilly Adult Community Learning will use the information you provide when completing surveys / focus groups on digital exclusion for the purpose of exploring the reasons for digital exclusion. This information will be collated together into a report from which individuals will not be able to be identified. This report will be available to Welsh Government, all participating authorities and may be used to bid for funding in relation to digital exclusion projects.

The surveys/focus groups will be run by Basis Ltd on behalf of Caerphilly County Borough Council. The legal basis for processing this information is legitimate interests, and we will not keep this data in a form where individuals can be identified for longer than is necessary.

You have a number of rights in relation to the information including the right of access to information we hold about you and the right of complaint if you are unhappy with the way your information is being processed.

For further information on how we process your information and your rights please click the following link:

[{Hyperlink to Full Privacy Notice on our website}](#)