

[Nottingham Trent University – Privacy Notice](#)
[ISAAC DigiLab Service and ISAAC Mobile Lab Service](#)

Introduction

Your privacy and protection of your personal information is very important to us and we are committed to robust compliance with the retained EU law version of the General Data Protection Regulation (“**UK GDPR**”) and the Data Protection Act 2018.

This privacy notice explains what Nottingham Trent University (“**NTU**”, “**we**”, “**us**” or “**our**”) does with your personal information, your rights and how we protect it. This notice applies to all individuals (“**you**” or “**your**”) who access the ISAAC Digi Lab Service and ISAAC Mobile Lab Service at NTU (each a “**Service**” and together the “**Services**”).

The Services are provided by the ISAAC Research Centre at Nottingham Trent University. Each Service is a standalone service, offered to non-profit organisations engaged in heritage science research. The ISAAC Digi Lab Service will provide spectral imaging data processing and analysis such as clustering for large data sets, using an automated methodology. The ISAAC Mobile Lab Service will provide heritage institutions with access to: unique in-house developed cutting-edge mobile imaging and spectroscopy instruments (funded by UK Research Council grants); state-of-the-art commercial and bespoke instruments for in situ analysis in art conservation, history and archaeology; advanced data science methodologies for interpretation of results; and expertise in interdisciplinary research at the interface between science and heritage.

For more information about the Service visit our website: <https://www.isaac-lab.com/>.

We encourage you to review the privacy statements of any websites you choose to navigate to from our website (or navigate from to our website) or digital services that we provide links to so that you can understand how those websites collect, use and share your information as well. Any third party sites that you can access through the website are not covered by this Privacy Notice and we accept no responsibility or liability for these sites.

Who we are

For the purposes of the UK GDPR, NTU is a “controller” which means we are responsible for deciding how we hold and use personal information about you.

You can find us in the Information Commissioner’s register of organisations who have paid the controller fee [here](#).

If you have any questions about the use of your personal information within either of the Services, or wish to exercise your rights, please contact:

Tracy Landon – Legal Services Manager and Data Protection Officer

Nottingham Trent University

Address: 50 Shakespeare Street, Nottingham, NG1 4FQ

Email: DPO@ntu.ac.uk

We may need to update this Privacy Notice from time to time. If changes made to this Privacy Notice are considered to be material, we will notify you of the changes.

Personal information

NTU is committed to the responsible handling and protection of personal information.

Personal data, or personal information, means any information about an individual from which that person (a “**Data Subject**”) can be identified. It does not include data where the identity has been removed (anonymous data). The information will be personal data if a person can be identified either directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that person. For example personal data may include names, addresses, email addresses and telephone numbers; it may also include images in photographs or films and recorded telephone conversations.

Why we process your personal information

We process your personal information to enable us to deliver the Services and to assess your suitability for the Services.

Further information on the ways in which we handle your personal information is provided below.

We want to be clear about our privacy practices so that you are fully informed and can make choices about the use of your information, and we encourage you to contact us at any time with questions or concerns – Data Protection Officer at DPO@ntu.ac.uk.

The personal information we hold on participants

As a Service user, you will be involved in the Service directly with NTU. The following information for each Service user may be collected from you:

- name and contact details, such as place of work, job title, telephone number and email address;
- academic background and short CV; and
- your ORCID number.

We may also collect business details that is not personal information such as ownership details, registered company number, date of incorporation, name of employer and address and company turnover.

How we use your personal information

Initially, we will use your personal information to allow us to assess your, or your organisation's, eligibility for a Service and carry out the necessary checks.

We will use your personal information for the administration of your involvement in the Services and to keep in touch with you and to provide you with information about the Services and the benefits available to you (and your employer where applicable).

We will also use your information to provide statistics relating to the research undertaken as part of the Services. This will be through anonymisation; you will not be identifiable from the statistics we provide.

When processing personal data, we rely on a combination of the grounds permitted by data protection law.

Your rights as a Data Subject can depend on the legal basis relied upon (please see heading below "Your Rights").

Illustrative examples of the types of processing activities which fall under each of the legal bases are as follows:

Lawful basis	Summary of what the lawful basis involves	Examples of circumstances in which we process personal data on this basis (processing activity)
Consent	You have given consent for us to process your personal data.	<ul style="list-style-type: none">• Some forms of contact and invitations of support which are undertaken electronically (other forms of these communications fall

		<p>within the “legitimate interests” basis below).</p> <ul style="list-style-type: none"> • Targeting advertising for future Services or other services that may be relevant to you. • Processing information collected for our diversity monitoring purposes.
Contract:	The processing is necessary for us to “perform” a contract we have with you, or because you have asked us to take specific steps before entering a contract.	<ul style="list-style-type: none"> • To carry out our contractual obligations with you, which may include the operation and delivery of our services in respect of the Services and dealing with requests and enquiries. • To enable all financial transactions to and from us in respect of a Service, including payments.
Legal obligation	The processing is necessary for us to comply with any statutory or legal obligation to which we are subject.	<ul style="list-style-type: none"> • Where it is necessary to comply with a legal and/or statutory obligation. For example, we have to ensure compliance with the Prevent Duty under the Counter Terrorism & Security Act 2015.
Public task	The processing is necessary for the performance of a task carried out in the public interest	<ul style="list-style-type: none"> • To anonymise your personal data for the purposes of providing statistics relating to the research undertaken as part of the Services or otherwise for inclusion in a research publication, conference presentation or public talk.
Legitimate Interests	The processing is necessary for our legitimate interests or the legitimate interests of a third party, and there is no reason to protect your personal data which overrides those legitimate interests.	<ul style="list-style-type: none"> • If we do not have a contract in place with you and you have not asked us to take steps before entering into a contract, we may process your personal data to pursue the legitimate interest of the delivery of our services in respect of the Services, and dealing with requests and enquiries. • To identify opportunities, products and services that may be of interest to you, and to invite you to get involved with NTU activities, including events, fundraising, mentoring, guest speaking and research in circumstances where your consent is not required. This may include disclosing personal data to trusted third parties, such as appointed service providers, from time to time.

		<ul style="list-style-type: none"> • To personalise better and send communications to you in circumstances where your consent is not required. • To ensure the data we hold is up to date and accurate. • To identify future opportunities to get involved, which may be of interest to you, in circumstances where your consent is not required. • To notify you about changes to our services.
Vital interests	The processing is necessary to protect someone's life (either the data subject, or another person).	<ul style="list-style-type: none"> • Disclosures may be made to external parties to ensure the safety and wellbeing of individuals; eg we may share your contact details with emergency health services if you are taken unwell while on the premises during a Service.

Who we share your data with

For the purpose of the Services, we will not share your personal data beyond individual departments and functions of NTU directly.

Your personal information will not be shared for commercial or marketing purposes.

Where necessary we will share information required by law or in the public interest, with, for example, the police or HM Revenue and Customs, any relevant regulator or to exercise or defend our legal rights.

Where information is shared outside the UK and European Economic Area we take appropriate steps to ensure that personal information is processed, secured, and transferred according to applicable law. When we transfer personal information from the UK to other countries in which applicable laws do not offer the same level of data privacy protection as in the UK, we take measures to provide an appropriate level of data privacy protection.

This means your rights and protection remain with your data, ie: we use approved contractual clauses, multiparty data transfer agreements, intragroup agreements, and other measures designed to ensure that the recipients of your personal information protect it. If you would like to know more about our data transfer practices, please contact DPO@ntu.ac.uk.

Anonymised data is likely to form part of a research publication, conference presentation or public talk.

How long we keep your data for

We will not store your personal information for longer than is necessary to fulfil the purposes for which we collected it. This may mean holding on to your personal information for a certain period of time after you have ceased to have a relationship with NTU, such as for the purposes of satisfying any legal, accounting, or reporting requirements for the Services.

When determining the appropriate period of time to retain your personal information, we consider several factors, including the amount, nature, and sensitivity of the information, the potential risk of harm from unauthorised use or disclosure of your information, the purposes for which we handle and use your information and whether we can achieve those purposes through other means, and the applicable legal requirements. We securely erase your information once it is no longer needed.

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.

Security of your personal information

We have in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal information to those employees and other third parties who have a legitimate need to know. They will only process your personal information on our instructions, and they are subject to a duty of confidentiality.

NTU takes data security seriously and we use appropriate technologies and procedures to protect personal information. For example:

- Policies and procedures – measures are in place to protect against accidental loss and unauthorised access, use, destruction, or disclosure of data.
- Business Continuity and Disaster Recovery strategies that are designed to safeguard the continuity of our service to our clients and to protect our people and assets.
- Appropriate restrictions on access to personal information.
- Monitoring and physical measures, to store and transfer data securely.
- Data Privacy Impact Assessments (DPIA) in accordance with legal requirements and our business policies.
- Periodic training on privacy, information security, and other related subjects for employees and contractors.
- Vendor risk management.
- Contracts and security reviews on third-party vendors and providers of services.

Your rights

You have a range of rights over your personal information. Under certain circumstances, by law you have the right to:

- **Request access** to your personal information (commonly known as a "data subject access request"). This enables you to receive a copy of the personal information we hold about you.
- **Request correction** of any inaccuracies relating to your personal information we hold about you.
- **Request erasure** or deletion of your personal information when it is no longer required.
- **Object to processing** of your personal information where we are processing your personal information on the basis of our legitimate interest (or that of a third party) and there is something about your particular situation which makes you want to object to processing on this ground. You also have the right to object where we are processing your personal information for direct marketing purposes.
- **Request the restriction or suspension** of processing of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.
- **Object to any direct marketing** (for example, email marketing or phone calls) by us, and to require us to stop such marketing.
- **Request the transfer** of your personal information to another party.

If you wish to exercise your personal data rights or have any questions about how we use your data, please get in touch using the contact details at the top of this Privacy Notice.

If you believe that we have failed to manage your personal data appropriately, you have the right to complain to the statutory regulator – The Information Commissioner's Office.

The ICO contact details are: <https://ico.org.uk/global/contact-us/>

This privacy notice was last updated on 18 July 2022