



DRAGON

DEVELOPING RESISTANCE AGAINST GROOMING ONLINE

Privacy Notice

Project DRAGON-S and Project DRAGON+ (<https://www.swansea.ac.uk/project-dragon-s/>), are Swansea University research projects primarily funded by the Safe Online Initiative at End Violence (<https://www.end-violence.org/safe-online>) and the Tech Coalition Safe Online Research Fund 2023-24.

We are committed to protecting the privacy and security of your personal information.

Under data protection law, we (Project DRAGON-S and Project DRAGON+ within Swansea University) are a “data controller”. This means that we hold personal information about you and are responsible for deciding how we store and use that personal information.

As a data controller, we are required to inform individuals whose personal information we collect, obtain, store and use. That information is contained in this document (Privacy Notice).

The purpose of this notice is to promote transparency in the use of personal data, and to outline how we collect and use personal data during and after your interaction with us, in accordance with the General Data Protection Regulation 2016 and the Data Protection Act 2018.

It is important that you read this document, so you are aware of how and why we are using your personal information and the rights you have in relation to this information.

Identity and contact details of the Data Controller and Data Protection Officer:

Swansea University is the Data Controller and is committed to protecting the rights of individuals in line with the Data Protection Act 2018 and the UK General Data Protection Regulation (UK GDPR). Swansea University has a Data Protection Officer who can be contacted through dataprotection@swansea.ac.uk. For project specific information, please contact the Project DRAGON-S/DRAGON+ teams via: project.dragons@swansea.ac.uk / Project.dragonsplus@swansea.ac.uk.

Your personal data and its processing:

“Personal data” is defined as information relating to a live, identifiable individual. “Processing” is defined as any operation which we carry out using your personal data e.g., obtaining, storing, transferring or deleting.

Personal data is only processed for specified purposes, and if it is justified in accordance with data protection law.

What information do we collect about you?

The following are examples of personal data which may be collected, stored and used:

- Personal contact details such as title, name, telephone number and email address.
- Gender.
- Social media handles.
- Marketing and Communications data – preferences for receiving marketing.
- Business role and organisation information.
- Photographs/Filming/Testimonials.
- Financial data including billing address, account details, bank account holder details and bank card details.
- Information about engagement with the projects e.g., event attendance, meetings.
- Records of communications sent to you from the projects or that we receive from you.
- If participating in a research study, personal information collected may also include special category data. However, this will be outlined in the specific research consent forms for you to provide written consent to the processing of this data. Full information will be provided where required.

Special category data is personal data that includes race, religion/belief, sexual orientation, disability, pregnancy and gender reassignment. This data will not be processed outside of the special circumstances detailed above.

To put this into context, it includes personal information collected as a result of:

- Data held for delivery of our funded project/s.
- If you contact us.
- If you attend/book an event/training organised by us.
- If you are a stakeholder.
- If you supply goods or services to us.
- All forms of communication with us, including e-mail, social media, verbal and telephone communication.

What will we use your personal information for and what are our legal bases for doing so?

We only process data for specified purposes and if it is justified in accordance with data protection law. The legal basis that applies to our data processing is as follows:

1. Where processing is necessary for the performance of a contract with you; or
2. Where you have given consent to the processing of your personal data for one or more specific purposes; or
3. Where processing is necessary for compliance with a legal obligation to which we are subject; or
4. Where processing is necessary in order to protect the vital interests of you or of another natural person; or
5. Where processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in us (the controller); or
6. Where processing is necessary for the purposes of legitimate interests pursued by us or a third party, except where such interests are overridden by the interests or

fundamental rights and freedoms of yourself which require the protection of personal data.

To put the use of the six legal bases we use for processing personal data into context, we will use the personal data and information we collect for the following purposes:

- To reply to any enquiry, you make and to provide you with information regarding the services we provide.
- To deliver on any of our training/tool licenses and other services we offer.
- To conduct necessary research as outlined in relevant and specific participatory consent forms.
- To make a payment to you including a transfer of funds on completion of a transaction on which you have provided services to us.
- To manage our relationship with you.
- To comply with our legal and regulatory obligations.
- To undertake checks we deem necessary to confirm your identity.
- To deal with any feedback or complaint you may make.
- To administer, develop and improve our business.
- To protect our business e.g., defend any legal claim.
- To make suggestions and recommendations to you about the services we offer and which may be of interest to you.
- To invite you to any events (physically and online) we may hold or of which we may be a party, and which may be of interest to you.

How do we store your personal information?

Your personal information will be stored on our secure electronic systems and databases and will be shared with relevant colleagues within the University and to our partners where appropriate. Personal information is protected by us and will not be disclosed to third parties without consent except when necessary, as part of our contractual obligations e.g., to partners of the project supporting your interaction with us, or where the University engages a third-party data processor under contract.

Data Protection legislation requires us to keep your information secure. This means that your confidentiality will be respected, and all appropriate measures will be taken to prevent unauthorised access and disclosure. Only members of staff who need access to relevant parts or all of your information will be authorised to do so. Information about you in electronic form will be subject to password and other security restrictions, saved on our secure networks. We predominately a paper-free projects and therefore do not require physical paper file storage and security measures.

How long do we keep your data for?

We only keep and process personal data for as long as there is a contractual or business requirement to do so or we are otherwise obliged to keep the data under any contractual, regulatory or legal requirement. Once the requirement has expired, the information is deleted safely and securely from our systems and done so in accordance with current security regulations. Swansea University has a Records Retention Schedule, and individual funding bodies which we are contractually obligated to adhere to may also set document retention expectations to meet.

Who do we share your information with?

We may need to disclose your information to a third party as part of ongoing management and audit requirements. Third parties include:

- External advisors or consultants who are bound by confidentiality requirements in their contracts.
- Organisations who provide funding.
- Our professional advisers (e.g., legal, finance).
- Third party service providers who provide administrative or delivery services to us.
- HMRC.

We will ensure that if information is required to be shared, then it will be shared securely. You will be informed that we have shared it, who we have shared it with and how we shared it.

International transfer of your information:

Wherever possible, your personal data will be processed within the UK. In some circumstances, it might be necessary to transfer your personal data outside of the UK – for example where we use third party supplier to process data on our behalf. In the event of an international transfer of data, appropriate safeguards will be implemented and processing will be based on documented instructions from us.

Your responsibility:

As part of our responsibility to ensure that information we hold about you is up to date, we rely on you to keep us updated. We request that where any of your details change, that you inform us so that we may update our records accordingly.

Your rights:

Data protection legislation provides individuals with a number of different rights in relation to their data, these are:

- You have a right to access your personal information,
- You have a right for incorrect information held about you to be rectified,
- You have a right for information which you no longer wish us to hold to be erased (also known as the right to be forgotten),
- You have a right for the processing of your information to be restricted,
- You have a right to data portability – for your personal information to be transported in a structured, commonly used, recognisable format,
- You have a right to object to the processing of your personal information,
- You have a right not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning you or significantly affects you.

You also have the right to make a Subject Access Request. As part of this process, you will be able to ascertain:

- Whether or not your data is processed, and if so why,
- The categories of personal data concerned,
- The source of the data if you have not provided the original data,
- To whom your data may be disclosed, including outside the European Economic Area and the safeguards that apply to such transfers.

How to make a complaint:

If you are unhappy with the way in which your personal information has been processed you may in the first instance contact the University Data Protection Officer using the contact details above.

If you remain dissatisfied then you have the right to apply directly to the Information Commissioner for a decision. The Information Commissioner can be contacted at: -

Information Commissioner's Office,
Wycliffe House,
Water Lane,
Wilmslow,
Cheshire,
SK9 5AF

ico.org.uk