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October 2024

# PRIVACY STATEMENT



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The Wise Group is a leading social enterprise working to lift people out of poverty. As an enterprise, we build bridges to opportunity for the most vulnerable in our society. Every day we support our customers into jobs, work to lift people out of fuel poverty, and help people coming out of prison to build a better future.

This privacy statement sets out how we use and protect the personal information we process, and the rights of the individuals who trust us with their information. It also describes our commitment to data protection principles and how to get in touch with us. This statement is supplemented by more detailed and programme specific privacy notices, most of which are available on our website (<https://www.thewisegroup.co.uk/privacy/>). If you can't find what you're looking for, please get in touch by emailing [enquiries@thewisegroup.co.uk](mailto:enquiries@thewisegroup.co.uk) or call 0141 303 3131.

## About us

The Wise Group is registered with the Information Commissioner's Office (ICO) as a **data controller**. This means that when we process personal information on our own behalf, we are responsible for determining the purposes and means of that processing.

To deliver some of our projects and services we also act as a **data processor**. This means that we process personal information on behalf another data controller, acting on their instruction.

We process personal information in accordance with UK data protection legislation (specifically the UK GDPR and the Data Protection Act 2018). These laws exist to ensure that data is collected lawfully, stored safely, and used responsibly.

## 1. Personal data processing

Personal data means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We collect and use personal information in the following circumstances:

PURPOSE	PERSONAL DATA CATEGORIES	LAWFUL BASIS
<i>If you are referred to or access one of our services as a customer</i>	<ul style="list-style-type: none"><li>Name, contact information, details of your personal circumstances and support needs, and any other information relevant to the service you're accessing.</li></ul>	<ul style="list-style-type: none"><li>Consent:</li></ul> <p>Before joining a Wise Group service, the personal information we process will be explained to you so you can make an informed decision about whether you wish</p>



	<ul style="list-style-type: none"><li>Depending on the service you access and only if necessary, we might ask you to provide us more sensitive information (i.e., health-related information or information about past offending).</li></ul>	to participate. Find our service-specific privacy notices here: <a href="https://www.thewisegroup.co.uk/privacy/">https://www.thewisegroup.co.uk/privacy/</a>
<b><i>If you apply to a Wise Group vacancy</i></b>	<ul style="list-style-type: none"><li>Name, contact details, employment/education history, skills/knowledge/experience, and any other information we might need to determine your suitability for the role you applied for. We use this information to shortlist suitable candidates for interview, conduct interviews and make a job offer.</li><li>We also ask for equal opportunities information so we can conduct equal opportunities monitoring.</li><li>Conduct pre-employment checks including reference checks and making sure you have the right to work in the UK. Some roles may require criminal records check to be conducted</li><li>We ask individuals who have accepted a job offer to complete a health questionnaire so we can ensure we have all suitable and reasonable adjustments in place for you.</li></ul>	Performance of contract /legal obligations
<b><i>If you work with us as a Wise Group colleague</i></b>	<ul style="list-style-type: none"><li>Name, contact information, background details, performance and capability, learning and development, salary/payment and bank details (so we can pay you), health and safety assessments, and any other information we may need during your employment to meet our legal obligations as an employer.</li></ul>	Performance of contract /Legal obligation



<b><i>If you are a Trustee</i></b>	<ul style="list-style-type: none"><li>Name, contact information, and other details we may need to meet our legal obligations.</li></ul>	Legal obligation
<b><i>If you provide us with goods and services, or work with us in any other capacity</i></b>	<ul style="list-style-type: none"><li>Name, company, contact information, nature of relationship, payment, and bank details (if applicable), and any other information which is relevant to our relationship or helps us meet our legal and contractual obligations.</li></ul>	Performance of contract/legal obligation
<b><i>If you visit one of our hubs</i></b>	<ul style="list-style-type: none"><li>We process information so we know who you are and why you're visiting us, to protect you while you're visiting us and for security. We may take your photograph to produce a temporary security pass whilst you're on site. The ID is for verification purposes only, we don't record this information.</li></ul>	Legitimate Interest - Security & Safety Reasons
<b><i>If you attend an event that we organise</i></b>	<ul style="list-style-type: none"><li>Name, contact details, attendance, and other event-specific details. We may take photographs at events that we may use in appropriate publicity materials. We rely on your consent to process the personal data you give us to facilitate the event. This means you have the right to withdraw your consent at any time.</li></ul>	Consent - Our purpose for collecting this information is so we can facilitate the event and provide you with an acceptable service.
<b><i>If you use our websites</i></b>	<ul style="list-style-type: none"><li>IP address, browser, and other details of the devices you use. Full details can be found here: <a href="https://www.thewisegroup.co.uk/privacy/">https://www.thewisegroup.co.uk/privacy/</a></li></ul>	Legitimate interest
<b><i>If you make an enquiry/ complaint</i></b>	<ul style="list-style-type: none"><li>Name, contact information and details relevant to your enquiry or complaint to make sure we manage it appropriately.</li></ul>	



<p><b>For marketing purposes</b></p>	<ul style="list-style-type: none"> <li>Name, contact information and details relevant to inform you of additional services available through wider Wise Group Programmes, Services and Activities.</li> </ul>	<p>Legitimate Interest – means our interest in conducting and managing our activities and projects to enable us to give you the best service and experience.</p> <p>Consent - Our purpose for collecting this information is so we can provide additional support to help you meet your goals or improve your personal circumstances (relevant to your needs).</p>
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- If you are referred to or access one of our services as a customer**

We process information such as name, contact information, details of your personal circumstances and support needs, and any other information relevant to the service you’re accessing. We do this so we can provide a tailored support package to meet your individual needs. We gather details relevant to inform you of additional services available through wider Wise Group programmes, services, and activities.

Depending on the service you access, you might be asked for your permission for us to process some information about you which is more sensitive (for example, health-related information or information about past offending). We only ask this where it is relevant to the service and your consent is freely given (you are under no obligation to provide this).

Before joining a Wise Group service, the personal information we process will be explained to you so you can make an informed decision about whether you wish to participate. A range of service-specific privacy notices are published on our website:

<https://www.thewisegroup.co.uk/privacy/>

- If you apply to a Wise Group vacancy**

We process information such as name, contact details, employment/education history, skills/knowledge/experience, and any other information we might need to determine your suitability for the role you applied for. We use this information to shortlist suitable candidates for interview, conduct interviews and make a job offer.

During the recruitment process we also:

- Ask for equal opportunities information so we can conduct equal opportunities monitoring



- Conduct pre-employment checks including reference checks and making sure you have the right to work in the UK. Some roles may require criminal records check to be conducted
- Ask individuals who have accepted a job offer to complete a health questionnaire so we can ensure we have all suitable and reasonable adjustments in place for you.
- **If you work with us as a Wise Group colleague**  
We process information such as name, contact information, background details, performance, and capability, learning and development, salary/payment and bank details (so we can pay you), health and safety assessments, and any other information we may need during your employment to meet our legal obligations as an employer.
- **If you are a Trustee**  
We process information such as name, contact information, and other details we may need to meet our legal obligations.
- **If you provide us with goods and services, or work with us in any other capacity** We process information such as name, company, contact information, nature of relationship, payment, and bank details (if applicable), and any other information which is relevant to our relationship or helps us meet our legal and contractual obligations.
- **If you visit one of our hubs**  
We process information, so we know who you are and why you're visiting us, to protect you while you're visiting us and for security. We may take your photograph to produce a temporary security pass whilst you're on site.
- **If you attend an event that we organise**  
We process information such as name, contact details, attendance and other event-specific details. We may take photographs at events that we may use in appropriate publicity materials.
- **If you use our websites**  
We process information such as IP address, browser and other details of the devices you use. Full details can be found here: <https://www.thewisegroup.co.uk/privacy/>
- **If you make an enquiry or a complaint**  
We process information such as name, contact information and details relevant to your enquiry or complaint to make sure we manage it appropriately.

Please note that during our interactions with you we might provide you with links to other websites or signpost you to other services or platforms, including social media channels. We are not in control of these resources, so we strongly recommend that you exercise caution and look at the privacy statement applicable to the website, platform, or service.

## 2. Data protection rights

The rights available to individuals depends on the legal basis for processing, but generally individuals have the following rights:

- **Right of access**  
To receive confirmation if we process your personal information and receive a copy of your data.



- **Right to rectification**  
To require us to correct any inaccurate personal information we hold.
- **Right to restrict processing**  
If you contest the accuracy of your data and the lawfulness of processing but do not request such data being erased.
- **Right to object**  
If you ask us to stop processing your personal data, we will stop doing so unless we can demonstrate compelling grounds as to why the processing should continue in accordance with data protection law.
- **Right to data portability**  
To receive your personal data in a structured, standard machine-readable format to transmit such data to another controller.
- **Right to erasure** (also known as the right to be forgotten) To request that we delete the data we hold about you.
- **Right to withdraw consent**  
If you no longer give us consent to process personal information (this does not affect the lawfulness of processing before consent was withdrawn).
- **Automated decision making and profiling**  
To be informed when an automated decision has been taken and not to be subject to a decision based solely on automated processing, including profiling.

You also have the right to lodge a complaint with [the Information Commissioner's Office](#). If you wish to exercise any of these rights, please contact our Data Protection Officer using the contact details below. In instances where the Wise Group is not the data controller and we are processing your information on instruction from another organisation, we will tell you who to contact if you wish to exercise any of your rights.

### 3. Security

We have a range of technical and organisational controls to protect personal information. They are regularly evaluated to ensure current and emerging threats to privacy are managed effectively.

Any partners and suppliers we contract with, (including those who support our IT and computer systems) are carefully selected, managed, and bound by strict contractual and confidentiality terms.

### 4. Sharing your personal data

Wise Group may transfer Personal Data to third parties, the data processors who are acting on behalf of the Wise Group if this is necessary to achieve the purposes described above.

Such recipients of personal data may be:





- Suppliers - that need the Personal Data to provide services to Wise Group (e.g.) sub-contractors processing data on behalf of the Wise Group in their capacity as Data Processors and the Wise Group as Data Controller
- Financial institutions
- Government, governmental organisations and departments
- Competent authorities and judicial authorities, if required by law or in connection with a criminal investigation or proceedings and in accordance with local regulations
- Third parties providing marketing services

## 5. Record retention

Personal information will not be kept for longer than is necessary. Our record retention policy and associated schedule governs how long information is kept for, and ensures we comply with all obligations and applicable legislation.

## 6. Fees policy

Individuals will not have to pay a fee to access their personal data or to exercise any of their other rights. However, we may charge a reasonable fee for the administrative costs of complying with the request if it is clearly unfounded, repetitive, or excessive. We make all reasonable efforts to respond to all requests and queries within one month. Nonetheless, it could take us longer than a month in particularly complex circumstances, but we will provide updates throughout the process. We may need to request specific information from you to help us confirm your identity. We may also contact you to ask you for further information in relation to your request to speed up our response.





## 7. Our Data Protection Officer

Should you have any general queries or wish to know more about this statement, please contact the Wise Group by email or phone:

- [enquiries@thewisegroup.co.uk](mailto:enquiries@thewisegroup.co.uk) • 0141 303 3131

If you have any concerns regarding our use of your personal data, or wish to exercise any of your rights, then please contact our Data Protection Officer:

Email: Telephone: Post:

[dataprotection@thewisegroup.co.uk](mailto:dataprotection@thewisegroup.co.uk)

02070528289

Trilateral Research

One Knightsbridge Green London

SW1X 7QA

More information about data protection and how it applies to you can be found on the [Information Commissioner's Office website](#).

## 8. About this statement

We keep our privacy notices under regular review and may update this notice at any time, it will be made available to view on the Bob HR System.

Revision Version No.	Date	Whom	Comments
V1	23-4-2019	K Antoniak/Trilateral	Approved Draft
V2	8-6-2021	K Antoniak/Trilateral	More detailed descriptions of data processing activities (high-level) included
V3	April 2022	J Rutherford	Not recorded
V4	25-7-2023	T Armstrong, approved by J Rutherford	Transferred to new branded template; Version Control table added to revised wording of Section 8. Footer on last cover page changed to Q&I Team.
V4	31-10-24	T Armstrong	Reviewed, no changes required

This notice does not form part of any contract of employment or another contract to provide services.



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For further information please contact the Quality & Improvement Team

[thewisegroup.co.uk](http://thewisegroup.co.uk)