

## Privacy Notice

### SDS Collaborative PhD Programme

#### Who are we?

The Skills Development Scotland Co. Limited (“SDS”, “we”, or “us”) is the national skills body supporting the people and businesses of Scotland to develop and apply their skills.

#### SDS PhD Programme

The SDS PhD Programme is a collaborative research partnership with the Scottish Graduate School of Social Science ([SGSSS](#)) to provide rigorous policy-focused research relevant to the skills agenda. SGSSS lead on academic aspects of the Programme while SDS supports research dissemination, student engagement and policy impact.

#### Who is this Privacy Notice for?

This Privacy Notice provides information for PhD students on the SDS Collaborative PhD Programme on how their personal data will be collected and processed in the context of their participation in the programme.

#### What personal information do we collect and process?

- Information you provide as part of your registration with the Host University to undertake a PhD as part of the SDS Collaborative Programme. This includes your name and University email address.
- Additional contact information that you provide to SDS on request. This includes your email address or mobile phone number.
- Information your university provides about changes to the duration of your PhD. This may include information about periods of leave, extensions or other circumstances affecting the duration of your studies, including, where relevant, medical or welfare information.
- Information you provide at the request of SDS in the form of a quote or comments about your participation in the PhD Programme.
- Photographs of you taken or provided for SDS PhD Programme communications or promotional materials, where you have consented to SDS using your image for these purposes.
- Information calculated by SDS relating to the cost of your PhD studies, including stipend, university fees and any Research Training Support Grant (RTSG) amount awarded to you.
- Information we collect about your participation in SDS PhD student networking activity and programmes, such as SDS PhD Student Seminars and the Annual PhD Networking Event.

- Information relating to engagement with SDS PhD Sponsors, including discussions or updates on student progress during the PhD
- Information recorded as part of annual review meetings with academic supervisors, students and SDS Sponsors about the direction and progress of the PhD. This may include information provided by the student or sponsor about progress, challenges or circumstances affecting the PhD, including, where relevant, health or welfare information.
- Contact details of students as part of our alumni network.
- Information about former students, such as current job title or role, where this is used to inform SDS PhD Programme brochures or similar promotional materials.
- Information relating to additional support requirements and/or disabilities, for the specific purpose of SDS making reasonable adjustments. Providing SDS with this type of information will be the choice of the individual.

### How does SDS use your personal information?

	Type of personal information	What does SDS use it for?	What is SDS' legal basis for using it?
1.	The personal information listed in the section above.	<ul style="list-style-type: none"> <li>• To deliver the SDS Collaborative PhD Programme in partnership with the SGSSS.</li> <li>• To maintain a record of SDS PhD students, including contact details, PhD topic, study duration and university information.</li> <li>• To maintain financial records for the SDS PhD Programme budget.</li> <li>• To allocate an SDS PhD Sponsor and ensure you receive an appropriate level of support during your PhD.</li> <li>• To gather feedback about your experience of the SDS PhD Programme.</li> <li>• To monitor the direction and progress of your PhD.</li> <li>• To maintain contact with former students through the SDS PhD alumni network.</li> <li>• To contact you about SDS PhD Programme events and related opportunities.</li> </ul>	Fair and lawful because it is: <ul style="list-style-type: none"> <li>• necessary for SDS to comply with its legal obligations</li> <li>• necessary for SDS to perform a task in the public interest</li> <li>• based on your consent (this only applies to optional promotional use)</li> <li>• necessary for reasons of substantial public interest, paragraph 6 and 8 of Schedule 1 of the Data Protection Act 2018 (statutory and government purposes, equality of opportunity or treatment)</li> </ul>

		<ul style="list-style-type: none"> <li>• To support your welfare and safety while you are on SDS premises.</li> <li>• To make reasonable adjustments where requested by the individual.</li> <li>• To decide whether to agree to an extension of your PhD studies and/or increase SDS' contribution to co-funding your PhD.</li> <li>• To use your quotes, comments or photograph in SDS PhD Programme promotional materials, such as the SDS PhD Brochure or SDS intranet articles.</li> </ul>	
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**When might we share your information?**

The information provided will be shared with the SGSSS for the purpose of delivering the SDS Collaborative PhD Programme.

The information you provide to us in the form of quotes or comments may be shared with SGSSS for the purposes of promoting the PhD Programme (e.g. as part of the PhD Brochure).

SDS may share your photograph with third-party organisations where you have provided your consent.

**How do we protect your information?**

Skills Development Scotland maintain a high standard of both physical and network security designed to protect paper or electronic forms of storage to hold and process your personal information.

Information that we hold about you will be subject to rigorous safeguards to ensure that it isn't accessed or disclosed inappropriately. We also take steps to ensure that your information is not damaged or rendered unavailable to those who have a right to see it.

To meet confidentiality requirements for our customers, stakeholders, and staff, Skills Development Scotland has Confidentiality, Data Protection and Information Technology notices in place and we ensure that staff are fully aware of these and the associated guidance in relation to your personal information. These also apply when

we dispose of paper records and delete electronic information in ways that ensure that your information cannot be recreated.

### How long do we store your information?

SDS will retain your contact information for up to 10 years after completion of your PhD. This enables us to provide follow-on support, such as responding to reference requests, and to invite you to SDS alumni events. Where your personal information has been included in SDS PhD Programme brochures, case studies or similar promotional materials, SDS may retain copies of those materials for up to 10 years for record-keeping, audit and governance purposes, and to evidence how the Programme has been promoted.

SDS will retain personal information relating to the funding and administration of your PhD studentship for up to 7 years following the final payment of programme funding. This is necessary to support post-award audit, assurance, monitoring and evaluation activity, and to evidence the appropriate use of public funds.

All other personal information, including any health or welfare information, will be securely deleted at the end of your PhD Programme

If you require any further detail or clarification on how long we will keep your personal information for and our reason for doing so, please feel free to get in touch with us through the contact information provided in the contact section below.

### Your Rights

Under Data Protection legislation – including the UK GDPR and Data Protection Act 2018 - you have a number of rights in relation to how your personal information is processed.

If you wish to find out what these rights are, please see [www.sds.co.uk/privacy](http://www.sds.co.uk/privacy) and get in touch with [DPO@sds.co.uk](mailto:DPO@sds.co.uk) if you wish to find out more information or enact one of those rights.

### Updating Information

Please let us know if the personal information which we hold about needs to be corrected or updated.

## Notice Amendments

We may update this privacy notice by posting a new version on the website and, where appropriate, we will notify you by email. Please check back frequently to see any updates or changes.

## Data Controller

The data controller responsible in respect of the information collected is The Skills Development Scotland Co. Limited, which is notified to the Information Commissioner as a data controller with registration number Z1445093.

Your host University will also be a separate data controller for any of your personal data that they process for their own purposes.

If you remain dissatisfied with our response following any review related to a request you have made regarding your personal data, you are entitled to appeal to the Information Commissioner. Such an application should be sent to the following address:

Information Commissioners Office

Wycliffe House, Water Lane, Wilmslow SK9 5AF

Phone: 0303 123 1113

Website: [ico.org.uk/](https://ico.org.uk/)

## How to make a complaint

If you have any concerns about the way your personal information is managed, or if you wish to make a complaint, please complete our [Customer Complaints Form](#). Should you remain dissatisfied with how we have handled your personal information, you are entitled to escalate your complaint to the Information Commissioner via the [ICO website](#).

## Contact

If you wish to get in touch regarding any queries about your rights, or for any other matter, please contact the Data Protection team at [DPO@sds.co.uk](mailto:DPO@sds.co.uk).