



SPRITE+

Privacy Policy

Version 4 .0

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SPRITE+ Project Team, Humanities Bridgeford Street, University of Manchester, Oxford Road M13 9P



Introduction

SPRITE+ is committed to protecting the privacy and security of our members' personal data. This policy explains what information we collect, how we use it, where it is stored, and the rights you have under the UK General Data Protection Regulation (UK GDPR). By becoming a SPRITE+ member, you acknowledge that your information will be processed in accordance with this policy.

We collect and store the minimum information necessary for us to carry out our functions and to enable you to participate in SPRITE+ activities. We keep your information until you tell us to remove it, or until SPRITE+ ends, whichever is earlier.

Definition of a SPRITE+ Member

A **SPRITE+ Member** is an individual who has registered to join the SPRITE+ community. Members typically include researchers, practitioners, industry partners, policymakers, and other stakeholders with an interest in digital trust, security, privacy, and related interdisciplinary themes. By joining SPRITE+, members gain access to communications, events, funding opportunities, and collaborative initiatives coordinated by the SPRITE+ team. Membership information is held securely and used solely for the administration and delivery of SPRITE+ activities in line with UK GDPR requirements.

Definition of SPRITE+ Expert Fellows

SPRITE+ Expert Fellows are members appointed to contribute specialist knowledge, insight, and sectoral perspectives to SPRITE+ activities. Expert Fellows come from academia, industry, government, law enforcement, and the third sector, and are selected for their expertise. Their information is collected and used to support the administration of the Expert Fellows programme, including communications, coordination of activities, and engagement with the wider SPRITE+ community.

Definition of SPRITE+ Event Participants

SPRITE+ Event Participants are individuals who attend SPRITE+ activities - online or in person – whether or not they are Members. These participants may sign up through external platforms or partner organisations to access specific events, workshops, or webinars. Their information is collected solely for the purpose of managing attendance, delivering event-related communications, and ensuring the smooth running of the activity. Event Participant data is held securely and processed in accordance with UK GDPR requirements.



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1. What Personal Data We Collect

As part of the membership process and ongoing engagement, SPRITE+ collects (or creates) and then stores the following information:

- Full name
- Email address
- Organisation or institution
- Job title or role
- Unique membership ID
- Attendance records for SPRITE+ events and activities
- Any additional information you voluntarily provide as part of your membership, such as your background, website, or mailing list preferences.

We only collect information that is necessary for managing your membership and delivering SPRITE+ activities.

2. How Your Data is Used

We process your personal data for the following purposes:

- Managing and administering your SPRITE+ membership
- Communicating with you about SPRITE+ activities, opportunities, and events
- Tracking attendance at events to support reporting and programme evaluation, if you have opted for this
- Managing access to member-only resources and opportunities
- Ensuring compliance with funder and institutional reporting requirements
- Maintaining accurate internal records

When it comes to our Members, we do **not** use your data for automated decision-making or profiling.

However, this is different in the case of Expert Fellows where a SPRITE+ Co-Director will decide on the application and the Delivery Team may profile Expert Fellows (based on their expertise) to match them to relevant projects.



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3. Attendance at SPRITE+ Workshops and Events

When SPRITE+ holds in-person events, such as workshops and lectures, we typically collect information on participants including:

- Full name
- Email address
- Organisation or institution
- Job title or role
- Unique membership ID – if applicable
- Interest for attending the event
- Travel bookings, including rail, air, and car mileage
- Dietary requirements

This information may be retained for future auditing purposes. Please note that while we can remove all records from SPRITE+ databases, the University of Manchester's financial records may still include line items attributed to you for travel or accommodation reimbursement for auditing purposes. Please contact the SPRITE+ Team for guidance on how you can erase your data.

4. Where Your Data is Stored

SPRITE+ uses the online database tool [Airtable](#) as a secure cloud-based platform to store and manage membership information. Airtable acts as a data processor on behalf of SPRITE+.

Airtable implements industry-standard security measures, including encryption in transit and at rest. Data may be stored on servers located outside the UK; where this occurs, Airtable provides appropriate safeguards in line with GDPR requirements.

We may also keep data regarding for example funding applications and contracting and finance in Microsoft Office application files and/or PDFs. These are stored in secure drive within the university of Manchester.

Access to your data is restricted to authorised SPRITE+ Delivery and Management team members only and selected partners with whom we are co-delivering an event or programme. We will publish on our website a list of all active partner organisations and the programmes and/or events that they are or have been involved in. Some University of Manchester staff- not directly part of SPRITE+ -may also access data in PDF, Excel or MS-word files for the purposes contracting and processing payments.

The data may be processed using [Airtable](#). The data is not shared with any other third parties and Airtable themselves do not access the data, except if required to do so by law; see [Airtable's own privacy policy](#) for more details. The information



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might be kept by us for (e.g. for post-event communications such as the circulation of slides) but will be deleted when it is no longer need and, in any case, no later than the end of the SPRITE+.

5. Analytics, Engagement Monitoring, and EDI Data

SPRITE+ uses analytics to understand how members engage with our activities and to evaluate the impact of our programme. This helps us improve our events, resources, communications, and funded project outcomes. All analytics are processed in line with UK GDPR requirements, and Members may opt out where applicable.

Use of Airtable for Analytics

SPRITE+ uses **Airtable** to store membership information and to generate internal dashboards that help us monitor engagement. The following types of data may be processed for analytics purposes:

- Attendance at SPRITE+ events
- Engagement with SPRITE+ resources, communications, or opportunities
- Participation in funded projects
- Membership activity over time

This processing is carried out under SPRITE+'s initiative to evaluate programme performance, impact, and to ensure effective delivery. Analytics are used internally by the SPRITE+ Delivery and Management Teams and are not shared externally in a form that allows individuals to be identified.

Opting Out of Analytics

You may opt out of analytics processing that relates to engagement monitoring. If you choose to opt out, your data will still be stored for membership administration, but it will not be included in dashboards or reports used to analyse engagement trends.

To opt out, please contact the SPRITE+ team at any time:

spriteplus@manchester.ac.uk

Please note:

- Opting out does **not** affect your membership status.
- Opting out does **not** remove your records from the system, as these may be required for producing aggregate statistics for the purpose reporting to our funders, but it will exclude them from internal analytics of engagement.
- Opting out does **not** remove your key, personal information required for booking travel, accommodation, or catering for our events.



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Equality, Diversity, and Inclusion (EDI) Data

As part of our commitment to Equality, Diversity, and Inclusion, SPRITE+ may collect optional EDI information during the membership sign-up process. This may include data relating to:

- Ethnicity
- Gender
- Disability status
- Other demographic characteristics

Providing EDI information is **entirely optional**, and members may choose **“Prefer not to disclose”** for any or all fields. EDI data is processed solely for monitoring and reporting purposes to help SPRITE+ understand the diversity of its membership and ensure equitable access to opportunities.

EDI data is processed under the UK GDPR provisions for:

- **Explicit consent** (as you choose whether to provide it)
- **Substantial public interest**, where applicable for equality monitoring

EDI data is stored securely, access is strictly limited, and it is never used to make decisions about individual members.

Opting Out of EDI Data Collection

If you do not wish to provide EDI information, simply select “Prefer not to disclose” during sign-up. You may also request that any previously submitted EDI data be deleted or anonymised at any time by emailing spriteplus@manchester.ac.uk.

6. Mailing Lists, Newsletters, and Website

SPRITE+ uses **JiscMail** and **EmailOctopus** to manage mailing lists and distribute newsletters, updates, and information about events, opportunities, and programme activities. These platforms act as data processors on behalf of SPRITE+ and store only the information necessary to deliver these communications.

Since migrating some newsletters to EmailOctopus, only SPRITE+ members who consented to being a part of the JiscMail mailing list have been migrated to EmailOctopus.



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What Data Is Processed

When you subscribe to a SPRITE+ mailing list or opt in during membership registration, the following information may be processed:

- Your full name
- Your email address
- Your organisation or affiliation (if provided)
- Your communication preferences
- Engagement data such as email opens or link clicks (EmailOctopus only)

This information is used solely for the purpose of sending newsletters, updates, and relevant programme communications.

Legal Basis for Processing

Mailing list and newsletter communications are processed under:

- **Consent**, where you have actively opted in to receive updates
- **Legitimate interests**, where communications are necessary for administering your SPRITE+ membership or participation in funded activities.

You may withdraw consent at any time.

How JiscMail and EmailOctopus Handle Your Data

Both platforms implement industry-standard security measures to protect your information. Data may be stored on servers outside the UK; where this occurs, appropriate safeguards are in place to ensure compliance with UK GDPR requirements.

Access to mailing-list data is restricted to authorised SPRITE+ team members.

Analytics and Engagement Tracking

EmailOctopus provides basic analytics (such as email open rates and link clicks) to help SPRITE+ understand how members engage with our communications. This information is used to improve the relevance and effectiveness of our newsletters.

You may opt out of analytics processing at any time by contacting the SPRITE+ team or by unsubscribing from the mailing list.

Opting Out of Mailing Lists

You can unsubscribe from SPRITE+ newsletters or mailing lists at any time by contacting the SPRITE+ team directly at spriteplus@manchester.ac.uk.

Unsubscribing will not affect your SPRITE+ membership status or access to member-only resources.



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The SPRITEHub Website

Our website ([SPRITEHub](#)) uses several plugins for functionality and has its own [Privacy Policy](#) and [Cookie Policy](#).

7. Sharing Your Data

We do **not** sell or share your personal data with third parties for marketing or other purposes not explicitly mentioned elsewhere in this document.

Your data may be shared:

- With The University of Manchester (as the host institution for SPRITE+)
- With funding bodies where reporting is required
- With event partners or collaborators, only where necessary and with appropriate safeguards
- If and when we are required to do so by law

Any sharing is strictly limited to what is necessary for programme delivery and compliance.

8. Your Rights Under GDPR

Under the UK General Data Protection Regulation (UK GDPR), you have important rights regarding how your personal data is collected, used, and stored. SPRITE+ is committed to ensuring these rights are upheld and that you remain informed and in control of your information (see also, [a list of all your rights under GDPR](#)).

Right to be Informed

You have the right to be informed about the collection and use of your personal data. This privacy policy explains what information we collect, why we collect it, how it is used, and who it may be shared with. We will always communicate changes to this policy clearly and transparently.

Right of Access

You have the right to request a copy of the personal data we hold about you. This includes information stored in Airtable and any related internal systems. We will provide this information in a clear and accessible format.

Right to Rectification

If any of the information we hold about you is inaccurate or incomplete, you have the right to request that it be corrected. We will update your records promptly once notified.



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Right to Erasure (Right to be Forgotten)

You have the right to request that your personal data be deleted in certain circumstances, such as when it is no longer needed for the purpose for which it was collected, or if you withdraw consent (where consent is the legal basis for processing). Some data may need to be retained for reporting or audit purposes, but we will explain this if applicable.

Right to Restrict Processing

You may request that we limit the way we use your data. This may apply, for example, if you contest the accuracy of the information or if you object to how it is being processed.

Right to Data Portability

You have the right to request that your data be transferred to you or another organisation in a structured, commonly used, and machine-readable format, where technically feasible.

Right to Object

You have the right to object to the processing of your personal data in certain situations, including processing based on legitimate interests or for direct communication purposes.

Right to Withdraw Consent

Where we rely on your consent (for example, for optional communications), you may withdraw this consent at any time. This will not affect the lawfulness of processing carried out before consent was withdrawn.

Right to Lodge a Complaint with a Supervisory Authority

If you believe your privacy rights have been infringed, you have the right to lodge a complaint with the relevant supervisory authority. In the UK, this is the **Information Commissioner's Office (ICO)**. The ICO can be contacted via:

<https://ico.org.uk>

We encourage you to contact the SPRITE+ team first so we can address your concerns directly.



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9. Legal Basis for Processing Your Personal Data

SPRITE+ processes your personal data under the following lawful bases:

- **Contractual necessity:** where your participation in funded activities requires formal documentation or reporting.
- For the purposes of **legitimate interests**. For example, where we collect data for the purposes of registering you for an event or for you to apply for funding.
- **Consent:** for sending newsletters or optional communications where required.

10. The Data Controller

The University of Manchester

Oxford Road

Manchester

M13 9PL

11. Emailing SPRITE+

The SPRITE+ email account, spriteplus@manchester.ac.uk, is accessed only by the SPRITE+ Director and Delivery Team. We retain emails as long as we need to, to carry out our activities.

12. SPRITE+ Contact

Mark Elliot

The University of Manchester

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M13 9PL

mark.elliott@manchester.ac.uk

13. For More Information or to Unsubscribe

If you wish to know more or unsubscribe from the SPRITE+ membership list, its information list and/or discussion group then please email spriteplus@manchester.ac.uk



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