



Revised: 3rd April 2024

Bryce Space and Technology, Ltd.

Data Protection Policy

Bryce Space and Technology, Ltd. (Bryce) maintains the following policy to comply with GDPR regulations within the context of Monitoring and Evaluation (M&E) for the UK Space Agency's Levelling Up programme. References to Responsible Person refer to Mr. Simon Potter (simon.potter@brycotech.com)

Introduction

This policy applies to all personal and other data collected through the Monitoring and Evaluation (M&E) activities of the UK Space Agency's Levelling Up programme, which includes the Space Ecosystem Development programme, and the Space Cluster Infrastructure Fund (SCIF) programme. As part of these activities Bryce is conducting monitoring and evaluation surveys (the "survey", the "surveys").

These surveys are conducted by Bryce Space and Technology Ltd ("Bryce", "us", "we", or "our"), on behalf of the UK Space Agency. Participation is voluntary. For the purposes of this survey, you will provide data to Bryce Space and Technology (the 'data processor') and the UK Space Agency (the 'data controller').

The [UK Space Agency](#) is an executive agency of the UK government, sponsored by the Department for Business, Energy & Industrial Strategy. It is responsible for all strategic decisions on the UK civil space programme and provide a clear, single voice for UK space ambitions.

[Bryce Space and Technology Ltd](#) is an analytics and engineering firm that partners with technology and advanced R&D clients. We deliver government programme support and business consulting. Our company number is 11306005 registered at Companies House. Our trading address is Friary Court, 13-21 High Street, Guildford, Surrey, United Kingdom, GU1 3DL. Our ICO reference number is ZB027182.

Where surveys are hosted on the [SmartSurvey](#) platform - all data collected is encrypted both in transmission and at rest, and stored in the UK in a secure data centre.

We intend to comply with our legal obligations under the **Data Protection Act 2018** (the '2018 Act') and the **EU General Data Protection Regulation** ('GDPR') in respect of data privacy and security. Further, we will ensure that data about your company will be handled in **absolute confidence**.

Bryce takes the security and privacy of your data seriously. We need to gather and use personal data and other data about your company as part of this survey. 'Personal data' is defined by the 2018 Act as 'any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier'. 'Other data' comprises all other data provided through the survey.

Data protection principles

Bryce is committed to processing personal data in accordance with its responsibilities under the GDPR. Article 5 of the GDPR requires that personal data shall be:

- a. Processed lawfully, fairly and in a transparent manner in relation to individuals;
- b. Collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes; further processing for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes shall not be considered to be incompatible with the initial purposes;
- c. Adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed;
- d. Accurate and, where necessary, kept up to date; every reasonable step must be taken to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay;
- e. Kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed; personal data

may be stored for longer periods insofar as the personal data will be processed solely for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes subject to implementation of the appropriate technical and organisational measures required by the GDPR in order to safeguard the rights and freedoms of individuals; and

- f. Processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures.”

Storage & Processing of Personal Data

Any personal data provided (e.g. name, email address) will only be used for the purposes of assisting you with the survey, or to contact you regarding any further queries or questions we have regarding your responses, and is processed subject to our respective privacy policies:

- [UK Space Agency Privacy Notice](#)
- [Bryce Space and Technology Privacy Notice](#)

Personal data will only be kept for as long as it is necessary under the stated purposes set out in the BryceTech privacy policy. Confidential personal records stored electronically will be permanently deleted, including backups, and shredded if in hard copy. Non-confidential records may be destroyed by recycling. Personal data will be deleted or destroyed within 120 days of the conclusion of monitoring and evaluation activities, upon a request from an individual exercising their right to be forgotten, or following a periodic reviews on the necessity to continue retaining data throughout the programme.

It may sometimes be necessary to retain personal data or access historical personal data if, for example, we are contractually bound to do so or if we are involved in legal proceedings in which the personal data is relevant.

Storage & Processing of Other Data

Any other data provided through the survey will be handled with **strictest confidence** by Bryce and the UK Space Agency. Data will be published solely in aggregate and anonymised form.

Data collected will be processed by Bryce to provide aggregate M&E analysis of the UK Space Agency's Levelling Up programme.

Security

- a. Bryce shall ensure that personal data is stored securely using modern software that is kept up to date.
- b. Access to personal data shall be limited to personnel who need access and appropriate security should be in place to avoid unauthorised sharing of information.
- c. When personal data is deleted, this should be done safely such that the data is irrecoverable.
- d. Appropriate back-up and disaster recovery solutions shall be in place.

Breach

In the event of a breach of security leading to the accidental or unlawful destruction, loss,

alteration, unauthorised disclosure of, or access to, personal data, Bryce shall promptly assess the risk to people's rights and freedoms and if appropriate report this breach to the ICO.