

Sovereign AI R&D Procurement Scheme Privacy Notice

This notice sets out how we will process your personal data, and your rights. It is made under Articles 13 and/or 14 of the UK General Data Protection Regulation (UK GDPR).

This privacy notice covers all personal data processing carried out by the Sovereign AI Fund within the Department for Science, Innovation and Technology (DSIT) under the R&D Procurement Scheme.

For data protection purposes, the Department for Business, Innovation, Science and Trade (BIST) is the data controller for this scheme. BIST was established following the July 2026 Machinery of Government changes, under which relevant functions transferred from the Department for Science, Innovation and Technology (DSIT), which was the former data controller.

1. Your Data

We will process the following personal data:

- Names, job titles, email addresses and telephone numbers of key individuals associated with the applicant organisation
- Contact details provided through the Expression of Interest (EOI) and Full Application processes, where they relate to identifiable individuals
- Personal information provided as part of conflict of interest declarations submitted by applicants e.g. personal, professional or financial interests that could create a conflict
- Information about key personnel submitted to support application, including CVs, professional experience, qualifications and project roles
- Names and personal details of project partners, consortium members and subcontractors
- Ownership and shareholding data relating to identifiable individuals

Where personal data has not been obtained from the data subject, it may have been obtained from third parties including project partners, subcontractors, government departments, due diligence providers (such as Creditsafe and Spotlight), public registers (including Companies House), sanctions databases, publicly available media sources, financial records and other public sector bodies where necessary.

2. Purpose

The purpose(s) for which we are processing your personal data is:

- To facilitate the operational delivery of the Sovereign AI R&D Procurement Scheme
- To assess eligibility for inclusion on the approved supplier list and to make contract award decisions
- To conduct due diligence on applicants, directors, project partners and subcontractors
- To enable monitoring and evaluation of the scheme to understand its impact and inform adjustments
- To conduct fraud prevention, sanctions screening, financial crime prevention and other integrity assurance checks
- To identify and manage conflicts of interest
- To manage, monitor and administer contracts and contract payments under the scheme
- To communicate with suppliers and subcontractors
- To carry out audit, assurance, reporting and compliance activities associated with the use of public funds
- To refer contractors to broader Sovereign AI cross-government support functions with your consent

Legal basis of processing

The legal basis for processing your personal data under Article 6 of the UK GDPR is:

1(e)Public task: Processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the data controller. The public task is to award and administer procurement awards via the Research and Development Exemption under the Procurement Act 2023. By procuring novel AI capabilities that support wider government priorities, the R&D Procurement Scheme will advance Sovereign AI's mission to anchor and grow strategically important AI companies in the UK and deliver public benefit.

3. Recipients

Beyond Sovereign AI and wider DSIT/BIST personnel, your personal data may be shared by us with:

- External technical assessors (subject matter experts) engaged to assess procurement applications

- Government departments participating in the scheme as Challenge Owners, (which may include MOD, DHSC, NCSC and others) for the purposes of assessing applications and overseeing project delivery
- Our appointed third-party evaluation partners to carry out monitoring and evaluation of the programme
- Due diligence providers, including Creditsafe and Spotlight, for the purposes of identity verification, sanctions screening, financial checks and fraud risk assessments
- Other public bodies where information sharing is necessary to assess eligibility, manage public funds, investigate suspected fraud, or comply with legal obligations

We may share your data if we are required to do so by law, for example by court order or to prevent fraud or other crime.

As part of our IT infrastructure, your personal data will be stored in the UK on systems provided by our data processors – Microsoft and Amazon Web Services. This does not mean we actively share your personal data with these entities; rather, they are technical service providers who host infrastructure supporting our IT systems.

4. Retention

Your personal data will be kept by us until 31 March 2030, in line with the end of the Sovereign AI R&D Procurement Scheme. A refreshed Privacy Notice will be published should there be an extension of the scheme beyond this date.

5. International Transfers

Your personal data will be processed in the UK and European Economic Area (EEA) with the needed safeguards in place, notably the UK Adequacy Regulations, the EU's Standard Contractual Clauses together with an international data transfer addendum, or the International Data Transfer Agreement.

6. Your Rights

You have the right to request information about how your personal data are processed, and to request a copy of that personal data.

You have the right to request that any inaccuracies in your personal data are rectified without delay.

You have the right to request that any incomplete personal data are completed, including by means of a supplementary statement.

You have the right to request that your personal data are erased if there is no longer a justification for them to be processed.

You have the right in certain circumstances (for example, where accuracy is contested) to request that the processing of your personal data is restricted.

You have the right to object to the processing of your personal data where it is processed.

To exercise your rights please contact the Data Protection Officer using the contact details below.

7. Contact Details

The data controller for your personal data is the Department for Business, Innovation, Science and Trade (BIST). During Sovereign AI's transition phase to BIST, you can contact the DSIT Data Protection Officer at:

DSIT Data Protection Officer
Department for Science, Innovation & Technology
22-26 Whitehall
London
SW1A 2EG

Email: dataprotection@dsit.gov.uk

New BIST contact details will be provided in due course.

If you are unhappy with the way we have handled your personal data, please write to the department's Data Protection Officer in the first instance using the contact details above.

8. Complaints

If you consider that your personal data has been misused or mishandled, you may make a complaint to the Information Commissioner, who is an UK independent regulator. The Information Commissioner can be contacted at:

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

Telephone: 0303 123 1113
<https://ico.org.uk/make-a-complaint/>

Any complaint to the Information Commissioner is without prejudice to your right to seek redress through the courts.

9. Updates to this notice

If this privacy notice changes in any way, we will place an updated version on this page. Regularly reviewing this page ensures you are always aware of what information we collect, how we use it, and under what circumstances we will share it with other parties. The 'last updated' date at the bottom of this page will also change.

If these changes affect how your personal data is processed, we will take reasonable steps to let you know.

Last updated: 24.08.26