



<b>Date of issue:</b>	June 2021
<b>Responsible sub-committee:</b>	Risk and Governance Committee
<b>Review Date:</b>	June 2026

<b>Version</b>	<b>Section</b>	<b>Amendments</b>	<b>Date</b>	<b>Author</b>
<b>1.0</b>	<b>n/a</b>	<b>New document</b>	June 2021	Director of IT

# General Privacy Notice

(Suppliers, Customers, Visitors and Others who get in touch with us)

## Policy Statement

During your time or work with us, we will gather and use information relating to you. Information that we hold in relation to individuals is known as their "personal data". This will include data that we

obtain from you directly and data about you that we obtain from other people and organisations. We might also need to continue to hold your personal data for a period after your child has left the Trust. Anything that we do with an individual's personal data is known as "processing".

This document sets out what personal data we will hold about you, why we process that data, who we share this information with, and your rights in relation to your personal data processed by us.

### **What information do we process in relation to you?**

We may need to collect, hold, share, and otherwise use the following information about you:

- Personal information (such as name, address, mobile numbers, employer, qualifications, personal email address, or emergency contact details)
- Financial details (such as bank account or credit card details if we are making payments to you)
- CCTV footage and images obtained when you attend the Trust site(s).

If we need to collect special categories of data such as gender, age, ethnic group, sex, or sexual orientation, religious or similar beliefs, information about health, genetic information and biometric data, these types of personal data are subject to additional requirements.

### **Where do we get your personal data from?**

We will obtain an amount of your personal data from you, by way of information gathering exercises at appropriate times such as when you agree a contract for supply or purchase from us, and when you attend the Trust site(s) and are captured by:

- Our CCTV system
- Visitor record logs
- Visitors to our websites
- Use of our guest Wi-Fi.

We may also obtain information about you from other sources. This might include information from your employer (for suppliers and customers) local authorities or other professionals or bodies.

### **Lawful conditions for using your information**

We can only collect, store, and use your information where we meet a lawful condition. The lawful conditions used to process your data are as follows:

#### **Public Interest**

We process your information as part of exercising our functions as a Public Authority. This condition applies to data processing required to provide trust functions such as the provision of education and supporting any of your specific needs and requirements.

#### **Legitimate Interests**

We process your information where we legitimately need it to support the trusts functions that are not directly related to the provision of education e.g., the use of CCTV.

## **Consent**

Sometimes we need permission to use your information. This includes taking pictures or videos of you to be used on our website or in the newspaper. Before we do these things, we will ask you or, if necessary, your parents/carers for permission.

There may also be circumstances where we need to use your information in relation to legal claims, or to protect your vital interests and where you are unable to provide your consent.

## **Why do we use your personal data?**

We will process your personal data for the following reasons:

1. Where we are required by law, including:
  - To provide reports and other information required by law in relation to the performance of a child (i.e., if you are visiting us in connection with a student – educational assistance, social care, health etc.)
  - To raise or address any concerns about safeguarding
  - To the Government agencies including the police
  - To obtain relevant funding for the school
  - To manage our business and sector relationships
  - To provide or obtain services or supplies from you.
2. Where the law otherwise allows us to process the personal data as part of our functions as a Trust, or we are carrying out a task in the public interest, including:
  - To confirm your identity
  - To communicate matters relating to the Trust to you
  - To safeguard you, our pupils, and other individuals
  - To enable payments to be made to/from the Trust and you/your company
  - To ensure the safety of individuals on the Trust site(s)
  - To aid in the prevention and detection of crime on the Trust site(s)
3. Where we otherwise have your consent

Whilst most of the processing of personal data we hold about you will not require your consent; we will inform you if your consent is required and seek that consent before any processing takes place.

## **Why do we use special category personal data?**

We may process special category personal data in relation to you for the following reasons:

1. Where the processing is necessary to ensure your health and safety on the Trust site(s), including making reasonable adjustments for any disabilities you may have

2. Where the processing is necessary for reasons of substantial public interest, including for purposes of equality of opportunity and treatment, where this is in accordance with our Data Protection Policy
3. Where we otherwise have your explicit written consent.

There may also be circumstances where we need to use your information in relation to legal claims, or to protect your vital interests or those of a child, and where it is not possible to seek your consent.

### **Failure to provide this information**

If you fail to provide information to us, we may be prevented from complying with our legal obligations.

### **How long will we hold your personal data for?**

We will hold your personal data only for as long as necessary. How long we need to hold on to any information will depend on the type of information as set out in our Retention Policy.

### **Who will we share your personal data with?**

We may need to share information about you with:

- Local authorities, to assist them in the exercise of their responsibilities in relation to education and training, youth support and safeguarding purposes
- The Department for Education and/or the Education and Skills Funding Agency, in compliance with legal obligations of the Trust as part of statutory data collections
- Contractors, such as payment processing providers to enable payments to be made by you to the Trust
- Auditors to comply with statutory duties.

The Department for Education may share information that we are required to provide to them with other organisations. For further information about the Department's data sharing process, please visit: <https://www.gov.uk/guidance/data-protection-how-we-collect-and-share-research-data>. Contact details for the Department can be found at <https://www.gov.uk/contact-dfe>.

### **Your rights in relation to your personal data held by us**

You have the right to request access to personal data that we hold about you, subject to several exceptions. To make a request for access to your personal data, you should contact the Data Protection Officer:

[dataprotectionofficer@inovamat.org](mailto:dataprotectionofficer@inovamat.org)

Please also refer to our Data Protection Policy for further details on making requests for access to your personal data.

You also have the right, in certain circumstances, to:

- Object to the processing of your personal data

- Ask us to delete your information
- Have inaccurate or incomplete personal data about you rectified
- Restrict processing of your personal data
- Object to the making of decisions about you taken by automated means
- Have your data transferred to another organization
- Claim compensation for damage caused by a breach of your data protection rights

If you want to exercise any of these rights, then you should contact the Data Protection Officer. The law does not oblige the Trust to comply with all requests. If the Trust does not intend to comply with the request, then you will be notified of the reasons why in writing.

### **Concerns**

If you have any concerns about how we are using your personal data, then we ask that you contact our Data Protection Officer in the first instance. However, an individual can contact the Information Commissioner's Office should you consider this to be necessary, at <https://ico.org.uk/concerns/>.

### **Contact**

If you would like to discuss anything in this privacy notice, please contact the Data Protection Officer: [dataprotectionofficer@inovamat.org](mailto:dataprotectionofficer@inovamat.org)