



Privacy Notice for Suppliers to the Trust

Under data protection law, individuals have a right to be informed about how the trust uses any personal data that we hold about them. We comply with this right by providing 'privacy notices' (sometimes called 'fair processing notices') to individuals where we are processing their personal data.

This privacy notice explains how we collect, store and use personal data about suppliers to the trust in line with the General Data Protection Regulation (GDPR) and the Data Protection Act 2018.

We, Carlton Academy Trust, are the 'data controller' for the purposes of data protection law. This means that we are responsible for deciding how we hold and use personal information about you.

Our Data Protection Officer (DPO) is Mr D Harvey-Hill and can be contacted in writing:

Mr D Harvey-Hill
University Academy
Green Head Road
Utley
Keighley
BD20 6EB

The personal data we hold

Personal data what we may collect, use, store and share (when appropriate) about you includes, but is not restricted to:

- ✓ Names, characteristics and contact details of representatives and other individuals employed by you or working on your behalf who we liaise with, and who are carrying out duties under your contract with us
- ✓ References, CVs and details of an individual's employment history, if collected as part of a bidding, tendering or engagement process
- ✓ Information relating to the visit, e.g. the individual's company or organisation name, arrival and departure times, vehicle registration details
- ✓ Bank details and other financial information where it relates to an individual, such as if you are operating as a sole trader
- ✓ Photographs for identification purposes for the duration of your visit
- ✓ CCTV images captured in school
- ✓ Information about any access arrangements you may need
- ✓ Any other personal information necessary to fulfil the terms of a contract we have with you



Why we use this data

We use this data to:

- ✓ Decide whether to engage you
- ✓ Fulfil the terms of our contract with you, including payment
- ✓ Keep accurate records of the suppliers we use
- ✓ Identify you and your representatives, employees and agents and keep you safe while visiting the trust sites
- ✓ Keep students and staff safe
- ✓ Maintain accurate records of visits to our schools
- ✓ Provide appropriate access arrangements

Our lawful basis for using this data

We only collect and use your personal data when the law allows us to. Most commonly, we use it where we need to:

- ✓ Fulfil a contract we have entered into with you
- ✓ Comply with a legal obligation
- ✓ Perform an official task in the public interest

Less commonly, we may also process your personal data in situations where:

- ✓ We need it to perform an official task in the public interest
- ✓ We have obtained consent to use it in a certain way
- ✓ We need to protect someone's vital interests (save your life or someone else's)

Where we have obtained consent, this consent can be withdrawn at any time. We will make this clear when we ask for consent, and explain how to withdraw it.

Some of the reasons listed above for collecting and using personal information about you overlap, and there may be several grounds which justify our use of your data.

Collecting this information

Some of the information we collect from you is mandatory, and in some cases you can choose whether or not to provide the information to us.

Whenever we seek to collect information from you, we make it clear whether you must provide this information (and if so, what the possible consequences are of not complying), or whether you have a choice.

We will only collect data that we need in order to fulfil our purposes, which are set out above.

How we store this data

We will keep your personal data whilst you are visiting our schools. We may also keep it beyond this, if necessary, to comply with our legal obligations. We also keep personal information about you, your representatives, employees and agents whenever you/they visit our site. We may keep it beyond the visit if this is necessary in order to comply with legal obligations.

Our DPO can provide information regarding how long we keep information. We have put in place appropriate security measures to prevent your personal information from being accidentally lost,



used or accessed in an unauthorised way, altered or disclosed. We will dispose of your personal data securely when we no longer need it.

Data sharing

We do not share information about suppliers or their representatives, employees or agents with any third party without consent unless the law and our policies allow us to do so. Where it is legally required, or necessary (and it complies with data protection law) we may share your personal information with:

- ✓ The Local Authority; to meet our legal obligations to share certain information with it, such as where the visitor information is relevant to a safeguarding concern
- ✓ The Department for Education; to meet statutory and legal obligations to share certain information with them
- ✓ Educators and examining bodies; necessary in the performance of our education function
- ✓ Our regulator, Ofsted; to enable it to evaluate the education we provide and which is in the public interest
- ✓ Suppliers and service providers; to enable them to provide the service we have contracted them for
- ✓ Central and local government; to meet statutory and legal duties and to enable the performance of contract
- ✓ Auditors; to demonstrate that we have taken appropriate action in providing our education service
- ✓ Your family or representatives, in cases of emergency, such as a health matter
- ✓ Health authorities; to assist where there are legal obligations
- ✓ Security organisations; with regard to legal or safeguarding investigations and to assist in crime prevention, detection and prevention of fraud
- ✓ Health and social welfare organisations; to enable us to comply with our duty of care and statutory safeguarding duties for your wellbeing
- ✓ Professional advisors and consultants; to support a legal entitlement and to assist with insurance claims
- ✓ Police forces, courts, tribunals; in order to uphold law and order
- ✓ Professional bodies; to verify information for legal purposes
- ✓ The organisation/company you are representing; to verify business interests and to verify information for legal purposes.

Transferring data internationally

Where we transfer personal data to a country or territory outside the European Economic Area, we will do so in accordance with data protection law.

Your rights: How to access the personal information we hold about you

Individuals have a right to make a 'subject access request' to gain access to personal information that the trust/schools holds about them. If you make a subject access request, and if we do hold information about you, we will:

- ✓ Give you a description of it
- ✓ Tell you why we are holding and processing it and how long we will keep it for
- ✓ Explain where we got it from, if not from you
- ✓ Tell you who it has been, or will be, shared with
- ✓ Let you know whether any automated decision making is being applied to the data and any consequences of this



- ✓ Give you a copy of the information in an intelligible form

You may also have a right for your personal information to be transmitted electronically to another organisation in certain circumstances.

If you would like to make a request please contact our Data Protection Officer, as above.

Your other rights regarding your data

Under data protection law, individuals have certain rights regarding how their personal data is used and kept safe. You have the right to:

- ✓ Object to the use of your personal data if it would cause, or is causing, damage or distress
- ✓ Prevent your data being used to send direct marketing
- ✓ Object to the use of your personal data for decisions being taken by automated means (by a computer or machine, rather than a person)
- ✓ In certain circumstances, have inaccurate personal data corrected, deleted or destroyed, or restrict its processing
- ✓ Claim compensation for damages caused by a breach of the data protection regulations

To exercise any of these rights please contact our Data Protection Officer, as above.

Complaints

We take any complaints regarding our collection and use of personal data very seriously. If you think that our collection or use of personal information is unfair, misleading or inappropriate, or have any other concern about our data processing, please raise this with us in the first instance by writing to our Data Protection Officer, as above.

- ✓ Alternatively, you can make a complaint to the Information Commissioner's Office:
- ✓ Report a concern online at www.ico.org.uk/concerns
- ✓ Call: 0303 123 1113
- ✓ In writing to Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF