St Paul's C of E Primary School

Life in all its fullness

Privacy Notice for Suppliers of Goods and Services

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Agreed and Signed by Chair of Governors	*Alex Smith* *El De Vaux*
Name	Alex Smith, El de Vaux

School supported by:

the ict service.

GDPR DPO Service provided by The ICT Service

dpo@theictservice.org.uk | **0300 300 0000**
www.theictservice.org.uk/gdpr-dpo-service

Training available upon request

Privacy Notice for Third Party Suppliers

Under Data Protection Law, individuals have a right to be informed about how St Paul's CofE VA Primary School, Coronation Street, CB2 1HJ, uses any personal data held about them. We comply with this right by providing privacy notices to individuals where we are processing their personal data.

This privacy notice explains how we collect, store and use personal data about Visitors to the school.

We, St Paul's CofE VA Primary School are the 'Data Controller' for the purposes of Data Protection Law.

Our Data Protection Officer is The ICT Service (see 'Complaints' / 'Contact us' below).

The personal data we hold:

We process data relating to those visiting St Paul's CofE VA Primary School. Personal data that we may collect, use, store and share (when appropriate) about you includes, but is not restricted to:

- Names, characteristics and contact details
- References, CVs and details of an individual's employment history, if collected as part of a bidding, tendering or engagement process
- Bank details and other financial information where it relates to an individual, such as if you're operating as a sole trader
- Any other personal information necessary to fulfil the terms of a contract we have with you
- Information relating to visits to the school, e.g. the individual's company or organisation name, arrival and departure time, car number plate

If our contract with you requires you to visit or carry out any work at the school site, our privacy notice for visitors to the school will also apply.
https://www.stpauls.cambs.sch.uk/gdpr-and-privacy-notices/

We may also collect, use, store, and share (when appropriate) information about you that falls into "special categories" of more sensitive personal data. This includes, but is not restricted to:

- Information about any access arrangements that may be required.
- Photographs for identification purposes.
- CCTV images captured in school.

We may also hold data about you that we have received from other organisations, including other schools and social services.

Why we use this data:

The purpose of processing this data is to:

a) Decide whether to engage you.
b) Fulfil the terms of our contract with you, including payment.
c) Keep accurate records of the suppliers that we use.
d) Identify you while on the school site and keep all individuals safe.

e) Keep pupils and staff safe while you are on the school site.
f) Keep accurate records of visits to the school.

Use of your personal data for marketing purposes

Where you have given us consent to do so, we may send you marketing information by email or text promoting school events, campaigns, charitable causes or services that may be of interest to you.

You can withdraw consent or 'opt out' of receiving these emails and/or texts at any time by clicking on the 'Unsubscribe' link at the bottom of any such communication, or by contacting us (see 'Contact us' below).

Use of your personal data in automated decision making and profiling

We do not currently process any personal data through automated decision making or profiling. If this changes in the future, we will amend any relevant privacy notices in order to explain the processing to you, including your right to object to it.

Our lawful basis for using this data:

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

- Comply with a legal obligation.
- Carry out a task in the public interest.

Less commonly, we may also use personal information about you where:

- You have given us consent to use it in a certain way.
- We need to protect your vital interests (or someone else's interests).

Where you have provided us with consent to use your data, you may withdraw this consent at any time. We will make this clear when requesting your consent and explain how you go about withdrawing consent if you wish to do so.

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

Where you have provided us with consent to use your data, you may withdraw this consent at any time. We will make this clear when requesting your consent, and explain how you would go about withdrawing consent if you wish to do so.

Our basis for using special category data:

For 'special category' data, we only collect and use it when we have both a lawful basis, as set out above, and one of the following conditions for processing as set out in Data Protection Law:

- We have obtained your explicit consent to use your personal data in a certain way.
- We need to perform or exercise an obligation or right in relation to employment, social security or social protection law.
- We need to protect an individual's vital interests (i.e. protect your life or someone else's life), in situations where you're physically or legally incapable of giving consent.
- The data concerned has already been made manifestly public by you.
- We need to process it for the establishment, exercise or defence of legal claims.

- We need to process it for reasons of substantial public interest as defined in legislation.
- We need to process it for health or social care purposes, and the processing is done by, or under the direction of, a health or social work professional or by any other person obliged to confidentiality under law.
- We need to process it for public health reasons, and the processing is done by, or under the direction of, a health professional or by any other person obliged to confidentiality under law.
- We need to process it for archiving purposes, scientific or historical research purposes, or for statistical purposes, and the processing is in the public interest.

For criminal offence data, we will only collect and use it when we have both a lawful basis, as set out above, and a condition for processing as set out in Data Protection Law. Conditions include:

- We have obtained your consent to use it in a specific way.
- We need to protect an individual's vital interests (i.e. protect your life or someone else's life), in situations where you're physically or legally incapable of giving consent.
- The data concerned has already been made manifestly public by you.
- We need to process it for, or in connection with, legal proceedings, to obtain legal advice, or for the establishment, exercise, or defence of legal rights.
- We need to process it for reasons of substantial public interest as defined in legislation.

Collecting this information:

While most of the information we collect from you is mandatory, there is some information that you can choose whether or not to provide 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.

Most of the data we hold about you will come from you, but we may also hold data about you from:

- Local authorities
- Government departments or agencies
- Police forces, courts, tribunals

How we store this data

Personal data we collect as part of the visitor process is stored in line with [St Paul's CofE VA Primary School] Data Protection Policy. https://www.stpauls.cambs.sch.uk/gdpr-and-privacy-notices/.

We will retain, and dispose of, the personal data of all visitors in accordance with the Retention Schedule set out in the Information and Record Management Society's Toolkit for Schools. This can be found **here (Maintained Schools).

We have put in place appropriate security measures to prevent your personal information 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 you with any third party without your 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 personal information about you with:

- Our local authority – to meet our legal obligations to share certain information with it, such as safeguarding concerns.
- Suppliers and service providers – to enable them to provide the service we have contracted them for, such as catering.
- Financial organisations
- Our auditors
- Survey and research organisations
- Health authorities
- Security organisations
- Health and social welfare organisations
- Professional advisers and consultants
- Charities and voluntary organisations
- Police forces, courts, tribunals

Transferring data internationally:

Where we transfer personal data to a country or territory outside the United Kingdom, 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 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 Helen Darrell – 01223 568840

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 processing.
- Claim compensation for damages caused by a breach of the data protection regulations.

To exercise any of these rights, please contact Helen Darrell – 01223 568840.

Complaints

We take any complaints about our collection and use of personal information 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.

To make a complaint, please contact Helen Darrell – 01223 568840.

You can also contact our Data Protection Officer:

The ICT Service
Email: dpo@theictservice.org.uk
Tel: 0300 300 00 00 option 1
Address: Speke House, 17 Compass Point Business Park, Stocks Bridge Way, St Ives, Cambridgeshire, PE27 5JL

Alternatively, you can make a complaint to the Information Commissioner's Office:

- Report a concern online at https://ico.org.uk/concerns/
- Call: 0345 196 8075
- Or write to: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF

Contact us:

If you have any questions, concerns or would like more information about anything mentioned in this privacy notice, please contact:

Helen Darrell – 01223 568840

This notice is based on the Department for Education's model privacy notice, amended to reflect the way we use Third Party data in this school.