

Privacy notice for visitors/commercial users of the site

Introduction

Under data protection law you have a right to be informed about how we use any personal data that is held about you. This **privacy notice** is designed to provide you with that information and to make sure that we, Academy Transformation Trust and our academies, are complying with the law.

Data controller and data processors

Academy Transformation Trust is the **data controller** for the purposes of data protection law. We are therefore the organisation in charge of how your personal information is collected and used.

Your academy, along with some authorised third party organisations (such as ParentPay) collect, process and 'use' data on our behalf and are therefore **data processors**.

The postal address of Academy Transformation Trust is Unit 4 Emmanuel Court, Reddicroft, Sutton Coldfield B73 6AZ.

If you want to contact us about your personal information you can contact the Data Protection Lead within the academy. You can speak to them in school or you can leave a letter at reception or send one by post.

The Trust's Data Protection Officer is Andy Gannon, who can be contacted at DPO@academytransformation.co.uk.

We will ensure that your personal data is processed fairly and lawfully, is accurate, is kept secure and is stored for no longer than necessary.

The categories of personal data we hold

We hold information about you to make sure that we can provide you with services and ensure you are safe while on site.

We hold information including

- personal information – your name, address and contact details
- financial details – such as bank or credit card details
- details, where relevant, about training or qualifications and insurance for using our premises
- criminal records information, if relevant, including DBS checks for volunteers
- other information, including photographs, images on CCTV and biometric data (in some cases).

We may also use special categories of data such as gender, age, ethnicity, sex or sexual orientation, religious or similar beliefs, information about health conditions, genetic information and biometric data. This information is subject to additional requirements.

Why we use this data

We use this data

- where required to by law, including

- to check your eligibility where appropriate
- to comply with legal and statutory requirements
- to safeguard users of our services
- where the law otherwise allows us to in order to carry out a task for contractual, legal or legitimate business interest reasons, including
 - to confirm your identity
 - to provide you with any services that you have purchased or received
 - to notify you if we will be unable to provide a service you have booked before
 - for research and analysis so we can develop and improve our services for your benefit
- where we otherwise have your consent to do so – including to provide marketing communications and to tailor our communications to you to ensure relevance.

We may process special category personal data in relation to you

- where the processing is necessary for reasons of substantial public interest, including for the purposes of equality of opportunity and treatment
- where the processing is necessary in order to ensure your health and safety while on site, including making any reasonable adjustments in respect of disabilities
- where we otherwise have your explicit consent in writing.

There may also be circumstances where we need to use your information in relation to legal claims or to protect your vital interests. In these cases, it will not always be possible to seek your consent.

Our lawful basis for using this data

We will only collect and use your information where the law allows us to. Most often we will use your information where

- we need to in order to comply with the law
- we need to use it to carry out a task in the public interest (this includes providing your child with an education).

Sometimes we will also use your personal information where

- you have given us permission (known as consent) to use it in a particular way
- we need to protect your (or someone else's) health interests.

If we ask for permission from you to use information, you can withdraw this permission at any time. We will make this clear when we ask for permission and tell you how to go about withdrawing it.

Some of our reasons for using data overlap, and there may be several reasons that justify our use of your data.

If you fail to provide information to us we may be prevented from complying with our legal and/or statutory obligations. In some cases, we will not be able to provide these services/facilities in the absence of the data.

How we store the data

We will hold information as long as necessary. We retain personal information as long as we consider it useful to contact you, or as needed to comply with our legal/statutory obligations. When data is no longer needed, we will promptly and securely destroy it.

If CCTV footage is being stored in the event of an incident, we may retain it until any investigations are concluded.

You can find out how long we will keep your information in the 'retention and destruction of data' section of our *Data protection policy*.

We may keep information about you in a variety of formats, including on paper, electronically or in the form of video or audio recordings.

Data sharing

We will not share your data outside our Trust, unless you have provided explicit written consent.

The only exception to this might be where we have to fulfil specific legal duties, such as

- communicating with government agencies in regard to auditing functions
- communicating with health or emergency services in the event of an accident or incident on site.

Services provided by other third parties (commercial users only)

Sometimes third parties will use our facilities for delivering their own services. Where this takes place the third party will remain the controller of the data for the services that they provide. The data will not enter our database unless the individual that takes part in these services also provides us with their personal data directly or has provided this information to us previously.

For these services the third party will be responsible for upholding and responding to the rights of individuals. You should check to make sure you understand their approach to data protection.

Communicating with you (commercial users only)

There are certain communications we need to send to you so we can provide our services. We call these service communications and include service/booking related updates and financial correspondence. We would not be able to provide you with services if we did not send these communications.

If you enter into a fixed period booking/service with a specific end or renewal date, we will contact you at the appropriate time to remind you that your service is coming to an end and how you can renew/extend it.

Your rights

We only keep your information for as long as we need to or for as long as the law requires us to. You can find out more about how long we keep information in the 'retention and destruction of data' section of our *Data protection policy*.

You have other rights in relation to your personal data:

- You can ask us for a copy of the information we have about you by making a 'subject access request' via the DPL in your academy
- You can ask us to correct any information we have about you if you think it is wrong
- You can ask us to erase information about you (although there may be a good reason why we cannot always do this)
- You can ask us to limit what we do with your information (again, we may not always be able to agree to limit what we do if there is a legal reason why we cannot)
- You can object to what we are doing with your information
- You can ask us to transfer your information to another organisation in a format that makes it easy for them to use.

You can find out more information about these rights in our *Data protection policy* or by asking your DPL.

Contact and complaints

You can contact the Trust DPO by emailing DPO@academytransformation.co.uk.

If you have a complaint about how we are handling your personal data, you should address it using our complaints policy. Address your concern in the first instance to the DPL at your academy, or to the DPO at the address above.

You can also complain to the Information Commissioner's Office in one of the following ways:

- www.ico.org.uk/concerns
- Call 0303 123 1113
- Write to the Information Commissioner's Office, Wycliffe House, Water Lane, WILMSLOW SK9 5AF.