

Privacy Notice for Suppliers used by the School

Under data protection law, individuals have a right to be informed about how the school 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 of goods and services that the school contracts with, including their individual representatives, employees and agents ("you", "your"), in line with the General Data Protection Regulation (GDPR) and Data Protection Act 2018.

We, Denbigh Primary School, Denbigh Road, Luton, Beds, LU3 1NS, 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 is Chris Beeden (see 'Contact us' below).

The personal data we hold

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 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
- 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

If our contract with you requires you or your representatives, employees or agents to visit or carry out any work at the school site, we may also collect, use and store:

- Information relating to the visit, e.g. the individual's company or organisation name, arrival and departure time, car number plate
- Photographs for identification purposes
- CCTV images captured in school
- Information about any access arrangements that may be required

In this case, our privacy notice for visitors to the school will also apply.

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 that we use

- Identify you and your representatives, employees and agents while on the school site, and keep all individuals safe
- Keep pupils and staff safe while you or your representatives, employees or agents are on the school site
- Keep accurate records of visits to the school

Our lawful basis for using this data

We only collect and use your personal information 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

Less commonly, we may also use this personal information 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 an individual's vital interests (save someone's life)

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 your personal information overlap, and there may be several grounds which justify the school's use of this data.

Collecting this information

Some of the information we collect from you is mandatory, and in some cases it is optional.

Whenever we seek to collect personal information from you, we make it clear whether providing it is mandatory or optional. If it is mandatory, we will explain the possible consequences of not complying.

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

How we store this data

Where personal information is relevant to our contract with you, we keep it according to our record retention schedule and our statutory obligations.

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

Our record retention schedule sets out how long we keep this 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 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:

- *Our local authority – to meet our legal obligations to share certain information with it, such as where supplier information is relevant to a safeguarding concern*
- *The Department for Education*
- *Educators and examining bodies*
- *Our regulator [specify as appropriate e.g. Ofsted, Independent Schools Inspectorate]*
- *Other suppliers and service providers*
- *Central and local government*
- *Our auditors – to demonstrate that we have conducted appropriate due diligence during procurement processes*
- *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*
- *Professional bodies*

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 personal information we hold about you

Individuals have a right to make a **‘subject access request’** to gain access to personal information that the school 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 the 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.

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 by 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 our data protection officer.

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 our data protection officer.

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

- Report a concern online at <https://ico.org.uk/concerns/>
- Call 0303 123 1113
- 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 our **data protection officer**:

- Chris Beeden - contact@school-dpo.co.uk