



Privacy Notice: Visitors

Date/Version : April 2024. V2



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1. Introduction

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 individuals we employ, or otherwise engage, to work for us.

We, Grow Education Partners Ltd, at 36 Causton Street, London, SW1P 4AU, are the Data Controller for the purposes of data protection law. Our Data Protection Officer (DPO) is David Coy (see contact details below).

1.1 The Personal Data we process

- Name
- Company/Institution details
- Vehicle registration details
- Closed-circuit television Images (CCTV) images
- Disclosure and Barring Service details
- Photo ID.

1.2 Why we collect and use this data.

The purpose of collecting and processing this data is to help us to run Grow Education Partners efficiently, including to:

- Fulfilling our legal obligations in relation to Health & Safety.
- Informing our operational procedures
- Complying with the law regarding data sharing.

1.3 Our lawful basis on which we use this data.

This section contains information about the legal basis that we are relying on when handling your information. These are defined under Data Protection legislation and for personally identifiable information are:

- Processing is necessary to comply with the legal obligations of the organisation
- Processing is necessary for tasks in the public interest.

1.4 How we store this data.

Your data will be stored in the electronic visitor entry system for seven years.

1.5 Who we share information with

In order for us to legally, effectively and efficiently function we are required to share data with appropriate third parties, including but not limited to:

- Security organisations - to create a secure environment for all
- Our auditors, to ensure our compliance with our legal obligations

- Public bodies, such as NHS England
- Professional advisers and consultants - for us to develop our services and best provide our public service
- Police forces, courts, tribunals and security services.

1.6 Transferring data internationally

We may send your information to other countries when:

- we or a company we work with store information on computer servers based overseas; or
- we communicate with you when you are overseas.

We conduct due diligence on the companies we share data with and note whether they process data in the UK, EEA (which means the European Union, Liechtenstein, Norway and Iceland) or outside of the EEA.

The UK and countries in the EEA are obliged to adhere to the requirements of the GDPR and have equivalent legislation which confer the same level of protection to your personal data. For organisations who process data outside the UK and EEA we will assess the circumstances of how this occurs and ensure there is no undue risk.

Additionally, we will assess if there are adequate legal provisions in place to transfer data outside of the UK.

1.7 Data Protection Rights

Access rights

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 can:
- 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
- NOT provide information where it compromises the privacy of others
- 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.

In most cases, we will respond to subject access requests within 1 month, as required under data protection legislation. However, we are able to extend this period by up to 2 months for complex requests or exceptional circumstances.

Your other rights regarding your data:

You may;

- Withdraw your consent to processing at any time (This only relates to data for which the school relies on consent as a lawful basis for processing)
- Ask us to rectify, erase or restrict processing of your personal data, or object to the processing of it in certain circumstances and where sufficient supporting evidence is supplied

- Prevent the use of your personal data for direct marketing
- Challenge processing which has been justified on the basis of public interest, official authority or legitimate interests
- Request a copy of agreements under which your personal data is transferred outside of the United Kingdom.
- Object to decisions based solely on automated decision making or profiling (decisions taken with no human involvement, that might negatively affect you)
- Request a cease to any processing that is likely to cause damage or distress
- Be notified of a data breach in certain circumstances
- Refer a complaint to the ICO
- Ask for your personal data to be transferred to a third party in a structured, commonly used and machine-readable format (in certain circumstances)

If you would like to exercise any of the rights or requests listed above, please contact our DPO, David Coy

- Email: david.coy@london.anglican.org
- Phone: 020 3837 5145
- Address: Grow Education Partners, London Diocesan House, 36 Causton Street, London, SW1P 4AU

We will comply with the Data Protection legislation in regard to dealing with all data requests submitted in any format, but individuals are asked to preferably submit their request in written format to assist with comprehension.

We reserve the right to verify the requester's identity by asking for Photo ID. If this proves insufficient, then further ID may be required.

1.8 Data Protection Breaches

If you suspect that your or someone else's data has been subject to unauthorised or unlawful processing, accidental loss, destruction or damage, we ask that you please contact the DPO (see contact details below) and advise us without undue delay.

1.9 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 (DPO), David Coy (david.coy@london.anglican.org, 020 3837 5145).

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

- Report a concern online at <https://ico.org.uk/concerns/> or call 0303 123 1113
- Or write to: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF

1.10 Contact us

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

- Email: david.coy@london.anglican.org
- Phone: 020 3837 5145
- Address: Grow Education Partners, London Diocesan House, 36 Causton Street, London, SW1P 4AU



Changes to this Privacy Notice

We reserve the right to update this privacy notice at any time, and we will provide you with a new privacy notice when we make any substantial updates. We may also notify you in other ways from time to time about the processing of your personal information.