

## Privacy notice for suppliers used by an academy/the trust

Under data protection law, individuals have a right to be informed about how an academy/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 of goods and services that an academy/the trust 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, Trinity Multi Academy Trust c/o Trinity Academy Halifax, Shay Lane, Halifax HX2 9TZ, 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 Miss A-M Holdsworth (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 an academy/the trust 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 an academy, the trust or an organisation of the trust
- Information about any access arrangements that may be required

In this case, our privacy notice for visitors to an academy/the trust will also apply. A copy of this can be obtained via the trust website or by contacting the DPO (see 'Contact Us' below).

### 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 an academy/the trust site, and keep all individuals safe

- Keep students and staff safe while you or your representatives, employees or agents are on an academy/the trust site
- Keep accurate records of visits to an academy/the trust

### **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
- Perform an official task in the public interest

Less commonly, we may also use this personal information where:

- 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 an academy/the trust'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 Records Management Policy and our statutory obligations.

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

Our Records Management Policy sets out how long we keep this information. This is available online from the trust website or from the DPO in hard copy (see 'Contact Us' below).

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:

- Local Authorities – to meet our legal obligations to share certain information with them, such as where supplier information is relevant to a safeguarding concern
- The Department for Education – to meet our statutory 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, which is in the public interest
- Other suppliers and service providers – to enable them to provide the service we have contracted them for e.g. payroll
- Our auditors – to demonstrate that we have conducted appropriate due diligence during procurement processes
- Your family or representatives – in case of emergencies such as a health matter
- Health authorities – to comply with legal or statutory obligations, to comply with investigations and to support legal entitlements
- 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 advisers and consultants – to comply with student and employee entitlements 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

### **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 an academy/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 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. (see 'Contact Us' below)

### **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:

Miss A-M Holdsworth  
Data Protection Officer  
Trinity Multi Academy Trust  
Trinity Academy Halifax  
Shay Lane  
Halifax  
HX2 9TZ