

Privacy notice for suppliers used by an academy/the trust

Date	May 2024
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Under UK 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. References to "you" in this privacy notice cover all of these individuals.

Our trust, Trinity Multi-Academy Trust, Trinity MAT Central Offices, The Maltings, Maltings Road, Halifax HX2 0TJ, is the 'data controller' for the purposes of UK data protection law.

Our Data Protection Officer (DPO) is Mr Peter Knight (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 are 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, and vehicle 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 (available on our website).

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:

- 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

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

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 while on an academy/the trust site, and keep all individuals safe
- Keep students and staff safe while you are on an academy/the trust site
- Keep accurate records of visits to an academy/the trust

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 suppliers' 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 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 (in a life-or-death situation)

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 UK 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 are 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 UK 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 are 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 data

While the majority of information we collect about you is mandatory, there is some information that can be provided voluntarily.

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:

- Government departments or agencies
- Financial service organisations

How we store this data

We keep personal information about you while you work with an academy/the trust. We may also keep it beyond your work with an academy/the trust if this is necessary. Our Records Management Policy sets out how long we keep information about suppliers. 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 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.

Who we share data with

We do not share information about you without consent unless the law and our policies allow us to do so.

Where it is legally required or necessary (and it complies with UK data protection law), we may share personal information about you 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 to do
- 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 your personal data to a third-party country or territory, we will do so in accordance with UK data protection law.

In cases where we have to set up safeguarding arrangements to complete this transfer, you can get a copy of these arrangements by contacting us.

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 (subject to any exemptions that may apply):

- 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 us (see 'Contact us' below).

Your other rights regarding your data

Under data protection law, you have certain rights regarding how your personal data is used and kept safe. For example, you have the right to:

- Object to our use of your personal data
- Prevent your data being used to send direct marketing
- Object to, and challenge 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
- In certain circumstances, have the personal data we hold about you deleted or destroyed, or restrict its processing
- Withdraw your consent, where you previously provided it for the collection, processing and transfer of your personal data for a specific purpose
- In certain circumstances, be notified of a data breach
- Make a complaint to the Information Commissioner's Office
- Claim compensation for damages caused by a breach of the data protection regulations

To exercise any of these rights, please contact us (see 'Contact us' below).

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.

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

- Report a concern online at <https://ico.org.uk/make-a-complaint/>
- 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:

Mr Peter Knight - dataprotection@trinitymat.org