

Primary Advantage Privacy Notice: visitors

How we use visitors' information

Under data protection law, individuals have a right to be informed about how the federation 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 Visitors.

Primary Advantage Federation, (the Federation) is the 'Data controller' for the purposes of data protection law. Any references to "the federation" should also be taken to mean any of its schools. We have appointed Grow Education Partners Ltd as our data protection officer (DPO) and the responsible contact is Hassan Muzammal (see 'contact us' below).

1. The personal data we hold

We process data relating to those visiting our schools. Personal data that we may collect, use, store and share (when appropriate) about you includes, but is not limited to:

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

2. Why we collect and use this information

The purpose of collecting and processing this data is to help us run the federation efficiently, including but not limited to:

- Fulfilling our legal obligations in relation to Keeping Children Safe in Education
- Informing our operational procedures
- Complying with the law regarding data sharing.

3. Our lawful basis for using 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 federation.
- Processing is necessary for tasks in the public interest or exercise of authority vested in the federation (the provision of education).

4. Storing your data

Personal data is stored in accordance with our data protection & retention policy.

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:

- Ofsted - during a school inspection
- 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.

6. 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 federation 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
- 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 one month, as required under data protection legislation. However, we are able to extend this period by up to two months for complex requests or exceptional circumstances.

More information about how we deal with subject access requests is in our data protection & retention policy.

Your other rights regarding your data

You may:

- Withdraw your consent to processing at any time (This only relates to data for which the federation 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 European Economic Area
- 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
- Submit 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 Dan Hyslop via:

- governors@primaryadvantage.hackney.sch.uk
- 0207 2541010 Option 6
- Holy Trinity CE Primary School, Beechwood Road, London E8 3DY

The federation will comply with the data protection legislation in regard to dealing with all data requests submitted in any format, although individuals are asked to preferably submit their request in written format to assist with comprehension.

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 Federation's Governance Manager via governors@primaryadvantage.hackney.sch.uk and advise us without undue delay.

More information about how we deal with data breaches is in our data protection & retention policy.

7. 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 independent data protection officer Hassan Muzammal at Grow Education Partners: Hassan.Muzammal@london.anglican.org

Alternatively, you can refer 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

8. Contact us

If you have any questions, concerns or would like more information about anything mentioned in this privacy notice, please contact either the Federation's Data Protection Lead, Dan Hyslop via governors@primaryadvantage.hackney.sch.uk or our independent Data Protection Officer Hassan Muzammal via Hassan.Muzammal@london.anglican.org