

## Privacy Notice for Visitors

Under data protection law, individuals have a right to be informed about how a data controller uses any personal data that held 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.

Following Brexit, Regulation (EU) 2016/679, General Data Protection Regulation (GDPR) is retained EU law and known as UK GDPR. The UK GDPR sits alongside an amended version of the Data Protection Act 2018 that relate to general personal data processing, powers of the Information Commissioner and sanctions and enforcement. The GDPR as it continues to apply in the EU is known as EU GDPR.

This privacy notice explains how we collect, store and use personal data **for occasional and professional visitors, to the school who are required to sign in using the school's visitors' system.**

Parents/Carers visiting the school to drop off their child in the morning or collect their child at the end of the day, or who come to the school office to collect their child during the school day, or make enquiries, or

### Who we are

**Greenshaw High School** is part of Greenshaw Learning Trust. Greenshaw Learning Trust is the Data Controller for the purposes of the General Data Protection Regulations (GDPR) this means it is responsible for the personal data about you. The postal address of the Trust is: Greenshaw Learning Trust, Grennell Road, Sutton, Surrey, SM1 3DY.

The Data Protection Officer for the Trust is Judicium Consulting Limited.

Contact: Craig Stilwell.

Telephone: 0203 326 9174

As a Data Controller we are responsible for deciding how we hold and use personal information about you. We are required under data protection legislation to notify you of the information contained in this privacy notice. This notice does not form part of any contract of employment or other contract to provide services and we may update this notice at any time.

It is important that you read this notice, with any other policies mentioned within this privacy notice, so you understand how we are processing your information and the procedures we take to protect your personal data.

If you want to discuss, correct or update your personal information you should contact the school directly. You can leave a letter at reception or send one by post to:

Mr Alex Bingham  
Director of Operations – Data protection lead  
Greenshaw High School  
Grennell Road  
Sutton  
SM1 3DY

## **CATEGORIES OF INFORMATION WE COLLECT, PROCESS, HOLD AND SHARE**

We process data relating to those visiting our school. Personal data that we may collect, process, hold and share (where appropriate) about you includes, but not restricted to:

- Personal information and contact details such as name, title, addresses, phone numbers
- Information relating to your visit, e.g. your company or organisations name, arrival and departure time, car number plate;
- Information about any access arrangements you may need;
- Photographs for identification purposes for the duration of your visit;
- CCTV footage captured by the school.

### **Particularly Sensitive Information**

We may also collect, store and use information about you that falls into "special categories" of more sensitive personal data. This includes information about (where applicable):

- Disability, health and access requirements

Sensitive personal information (as defined under the UK GDPR as "special category data") require higher levels of protection and further justification for collecting, storing and using this type of personal information. We may process this data in the following circumstances:

- In limited circumstances, with your explicit written consent;
- Where we need to carry out our legal obligations in line with our data protection policy;

### **WHY WE USE THIS DATA & RETENTION**

The purpose of processing this data is to help us run the school, including to:

- Identify you and safely evacuate the school in the event of an emergency
- Ensure that appropriate access arrangements can be provided for visitors who require them

Except as otherwise permitted or required by applicable law or regulation, the School only retains personal data for as long as necessary to fulfil the purposes they collected it for, as required to satisfy any legal, accounting or reporting obligations, or as necessary to resolve disputes.

We will retain and securely destroy your personal information in accordance with our data retention policy. This can be found on the GLT website: [www.greenshawlearningtrust.co.uk](http://www.greenshawlearningtrust.co.uk).

### **OUR LAWFUL BASIS FOR USING THIS DATA**

We only collect and use personal information about you when the law allows us to. Most commonly, we use it where we need to:

- Comply with a legal obligation
- Carry out a task in the public interest
- Where we have legitimate interests in processing the data – for example, the use of photographs to enable us to clearly identify you in the event of an emergency evacuation

Less commonly, we may also use personal information about you where:

- You have given us consent to use it in a certain way
  - We need to protect your vital interests (or someone else's interests)
- 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 go about withdrawing consent if you wish to do so.

Some of the reasons listed above for collecting and using personal information about you overlap, and there may be several grounds which justify the school's use of your data.

## **COLLECTING THIS INFORMATION**

While the majority of information we collect from you is mandatory, there is some information that you can choose whether or not to provide to us.

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.

It is important that you read this notice, with any other policies mentioned within this privacy notice, so you understand how we are processing your information and the procedures we take to protect your personal data.

## **HOW WE STORE THIS DATA**

Personal data is stored in line with our Data Retention Policy. A copy of this is available on the GLT website. We maintain a visitor management system to store personal information about all visitors. The information contained in this file is kept secure and is only used for purposes directly relevant to work with the school.

When this information is no longer required, we will delete your information in accordance with our Data Retention Policy.

## **DATA SHARING**

We do not share information about you with any third party without your consent unless the law and our policies requires us to do so.

Where it is legally required, or necessary (and it complies with data protection law), the recipient of the information will be bound by confidentiality obligations, we require them to respect the security of your data and to treat it in accordance with the law.

## **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.

## **SECURITY**

We have put in place measures to protect the security of your information (i.e. against it being accidentally lost, used or accessed in an unauthorised way). In addition, we limit access to your personal information to those third parties who have a business need to know.

You can find further details of our security procedures within our Data Breach Procedure and our Cyber Security Procedure, which can be found on the GLT website.

It is important that the personal information we hold about you is accurate and current. Please keep us informed if your personal information changes during your working relationship with us.

#### Biometric Data

Greenshaw Learning Trust schools could request to use your information as part of an automated (i.e. electronically operated) recognition system. This is to allow access to the cashless catering system. The information that is used is referred to as 'biometric information'. This data will only be processed once we have obtained appropriate consent. For further information in relation to this, please see our Biometric Data Usage Procedure.

### **RIGHT OF ACCESS, CORRECTION, ERASURE AND RESTRICTION**

It is important that the personal information we hold about you is accurate and current. Please keep us informed if your personal information changes during your relationship with us.

Under certain circumstances by law you have the right to:

- Access your personal information (commonly known as a "subject access request"). This allows you to receive a copy of the personal information we hold about you and to check we are lawfully processing it. You will not have to pay a fee to access your personal information. However, we may charge a reasonable fee if your request for access is clearly unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances.
- Correction of the personal information we hold about you. This enables you to have any inaccurate information we hold about you corrected.
- Erasure of your personal information. You can ask us to delete or remove personal data if there is no good reason for us continuing to process it. Restriction of processing your personal information. You can ask us to suspend processing personal information about you in certain circumstances, for example, if you want us to establish its accuracy before processing it.
- To object to processing in certain circumstances (for example for direct marketing purposes).
- To transfer your personal information to another party.

### **RIGHT TO WITHDRAW CONSENT**

In the limited circumstances where you may have provided your consent to the collection, processing, and transfer of your personal information for a specific purpose, you have the right to withdraw your consent for that specific processing at any time. To withdraw your consent, please contact Alex Bingham. Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law.

We hope that Alex Bingham can resolve any query you raise about our use of your information in the first instance.

We have appointed a data protection officer (DPO) to oversee compliance with data protection and this privacy notice. If you have any questions about how we handle your personal information which cannot be resolved by Alex Bingham, then you can contact the DPO on the details below:

Data Protection Officer: Judicium Consulting Limited

Address: 72 Cannon Street, London, EC4N 6AE

Email: [dataservices@judicium.com](mailto:dataservices@judicium.com)

Web: [www.judiciumeducation.co.uk](http://www.judiciumeducation.co.uk)

Lead Contact: Craig Stilwell

## **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.

### **Contact**

We have appointed a data protection officer (DPO) to oversee compliance with data protection and this privacy notice. If you have any questions about how we handle your personal information which cannot be resolved by the school, then you can contact the DPO on the details below: -

Data Protection Officer: Judicium Consulting Limited

Address: 72 Cannon Street, London, EC4N 6AE

Email: [dataservices@judicium.com](mailto:dataservices@judicium.com)

Web: [www.judiciumeducation.co.uk](http://www.judiciumeducation.co.uk)

Lead Contact: Craig Stilwell

## **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 **Alex Bingham – School data contact**

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

**Last Updated**

We may need to update this privacy notice periodically so we recommend that you revisit this information from time to time. This version was last updated 16 Dec 2022