



Issue Date: December 2023

Review Cycle (Years): Annually

Next Review Date: 5th December 2024

Person Responsible: Head of Governance

GDPR: PRIVACY NOTICE POLICY (GENERAL) 2023-2024

APPROVAL/CONSULTATION REQUIREMENTS

WHO BY	REQ?	DATE	WHO BY	REQ?	DATE
SLT	Y <input type="checkbox"/>		Corporation	Y <input checked="" type="checkbox"/>	15-12-22
Health-Safety Comm.	Y <input type="checkbox"/>		Finance-Resources Comm.	Y <input type="checkbox"/>	
Trades Union	Y <input type="checkbox"/>		Audit Comm.	Y <input type="checkbox"/>	
Education-Standards Comm.	Y <input type="checkbox"/>		Remuneration Comm.	Y <input type="checkbox"/>	
POLICY LOCATION: Internal <input checked="" type="checkbox"/> (Sharepoint) External <input checked="" type="checkbox"/> (Website)					
Related Documents: •					

1. NOTICE ABOUT HOW WE USE YOUR PERSONAL INFORMATION

- 1.1 We are the data controller of personal information about you. We are Coventry College. Our address is: 50 Swanswell Street, Coventry CV1 5DG.
- 1.2 Our Data Protection Officer is the Chief Finance and Operating Officer. If you have any questions about this policy or the ways in which we use your personal information, please contact our Data Protection Officer at 50 Swanswell Street, Coventry CV1 5DG.
- 1.3 This privacy notice has been prepared in accordance with the General Data Protection Regulation (EU) 2016/679 ("GDPR") and the Data Protection Act 2018.
- 1.4 This notice sets out how we use your personal information and in particular:
 - the information that you give us and the uses made of your personal information;
 - the legal basis on which we collect and use your personal information;
 - how long we keep your personal information;
 - how we share your personal information;
 - how we transfer your personal information outside of Europe
 - automated decisions we make about you; and
 - your rights over your personal information.
- 1.4 In each case, you have certain rights, including how to get a copy of your data, how to get it corrected or deleted, and how to complain. These rights are set out in more detail below.
- 1.5 Please note that on occasions we may process "special categories" of information about you. This is information revealing racial or ethnic origin, political opinions, religious or philosophical beliefs or trade union membership, and the processing of genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person's sex life or sexual orientation.

2 THE INFORMATION THAT YOU GIVE US

2.4 College Visitors

- 2.4.1 As part of your visit to the College we store and use your personal details and information about your visit for the purposes of managing and operating the College.
- 2.4.2 We use CCTV at our buildings for the purposes of crime prevention, security and health and safety and maintain an electronic visitor registration system; accordingly, we will capture basic personal details and imagery of visitors to the College.

2.5 Suppliers and Contractors

- 2.2.1 In order to engage and manage our suppliers and contractors, where you are a supplier (or where if it is a company, you are its representative) we collect and store your contact information and, where appropriate, your bank account details.
- 2.2.2 You may also be asked to provide details of your occupation and your CV.
- 2.2.3 In addition, where you visit a building we will collect and process the information set out in the “College Visitor” section above.

2.6 Website users

- 2.3.1 In order to improve your experience of using our website we may collect, store and use the following kinds of personal data:
- information about your computer and about your visits to and use of this website (including your IP address, geographical location, browser type, referral source, length of visit and number of page views)
 - information that you provide to us for the purpose of registering an enquiry
 - information that you provide to us for the purpose of subscribing to any website services, email notifications and/or newsletters
 - any other information that you choose to send to us
 - cookies which enable the server to identify and track the browser used

3. THE LEGAL BASIS ON WHICH WE COLLECT AND USE YOUR PERSONAL INFORMATION

- 3.1 Except in the circumstances highlighted below, we process this information on the basis of our legitimate interests:
- we have a legitimate interest in wishing to interact with you to manage and operate effectively our College and to ensure that the College is safe and secure for all persons visiting; and
 - to be able to do so, we need to understand details of who is in the building and to be able to communicate with them.
- 3.2 Where we are required by law to hold certain records, then we collect and hold those records to comply with that legal obligation.

4. HOW LONG WE KEEP YOUR PERSONAL INFORMATION

- 4.1 We will not keep your personal information for longer than we need it for the purposes we have explained above. Details of how long we keep each type of information can be found in the College’s retention schedule.

5. HOW WE SHARE YOUR PERSONAL INFORMATION

- 5.1 We may share the personal information that you give us with the following organisations for the following purposes:

College Visitors

Organisation: Constabularies
Purpose: Investigation of a crime

Suppliers/Contractors

Organisation: Banks and other financial institutions
Purpose: Processing of payments and receipts

Website Users

Organisation: Google Analytics, Google AdSense
Purpose: To analyse and report on the use of the website and to provide advertisements based on website visits

6. HOW WE TRANSFER YOUR PERSONAL INFORMATION OUTSIDE EUROPE

- 6.1 We do not store or transfer your personal data outside of Europe.

7. AUTOMATED DECISIONS WE MAKE ABOUT YOU

- 7.1 We do not make automated decisions using this information.

8. YOUR RIGHTS

- 8.1 You have a number of rights over your personal information, which are:

- the right to make a complaint to the Information Commissioner's Office (ICO) if you are unhappy about the way your personal data is being used – please refer to the ICO's website for further information about this (<https://ico.org.uk/>);
- the right to ask us what personal information about you we are holding and to have access to a copy of your personal information;
- the right to ask us to correct any errors in your personal information;
- the right, in certain circumstances such as where our use of your personal information is based on your consent and we have no other legal basis to use your personal information, to ask us to delete your personal information;
- the right, in certain circumstances such as where we no longer need your personal information, to request that we restrict the use that we are making of your personal information;
- the right, in certain circumstances, to ask us to review and explain our legitimate interests to you; and
- the right, where our use of your personal information is carried out for the purposes of an agreement with us and is carried out by automated means, to ask us to provide you with a copy of your personal information in a structured, commonly-used, machine-readable format.

9. CHANGES TO OUR PRIVACY POLICY

- 9.1 We keep our privacy policy under regular review and will update it from time to time to make sure it remains up-to-date and accurate.

10. REVIEW OF POLICY

- 10.1 The above policy will be reviewed by the relevant parties annually, or as required.

11. ENVIRONMENTAL IMPACT ASSESSMENT

- 11.1 The College is fully committed to the sustainability agenda.
- 11.2 All policies take into consideration, at the time of writing and approval with the Senior Leadership Team, their impact on the agenda.
- 11.3 Policies may not be approved or be amended if they impact significantly on our commitment to improving our carbon footprint and our corporate social responsibility.

12. GENERAL DATA PROTECTION REGULATION (GDPR)

- 12.1 All policies which are approved by the Corporation are in line with our GDPR suite of policies and procedure.