Privacy Notice for suppliers of goods and services
(in line with UK GDPR)

Introduction

Under UK data protection law, individuals have a right to be informed about how we, either directly or through one or more of our schools, 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 we, either directly or through one of our schools, contracts with, including their individual representatives, employees and agents**. References to "you" in this privacy notice cover all of these individuals.

Venn is the 'data controller' for the purposes of UK data protection law.

Our data protection officer is Helen Turner (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
- 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, vehicle number plate
- Information about your use of our information and communication systems, equipment and facilities.

If our contract with you requires you to visit or carry out any work at our school sites/premises, our privacy notice for visitors to the school will also apply.

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:

- Information about any access arrangements that may be required
- Photographs for identification purposes
- CCTV images captured in school.

We may also hold data about you that we have received from other organisations, including other schools or trusts and social services.

Why we use this data

We use the data listed above 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 the school site, and keep all individuals safe

- Keep pupils and staff safe while you are on the school site
- Keep accurate records of visits to the school
- Make sure our information and communication systems, equipment and facilities (e.g. school computers) are used appropriately, legally and safely.

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 or Venn wide 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 visitors' 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.

Use of your personal data for filtering and monitoring purposes
While you are in our school, we may monitor your use of our information and communication systems, equipment and facilities (e.g. school computers). We do this so that we can:
- Comply with health and safety and other legal obligations
- Comply with our policies and our legal obligations
- Keep our network and devices safe from unauthorised access, and prevent malicious software from harming our network.

Our lawful basis for using this data
Any personal data we process is done in accordance with Article 6 and Article 9 of the UK GDPR.

Our lawful basis for processing your personal information for reasons listed above are:
- Public task in line with Article 6(1)(e)
- Legal obligation in line with Article 6(1)(c)
- Consent in line with Article 6(1)(a) and explicit consent Article 9(2)(a)
- Vital interests in line with Article 6(1)(d) and Article 9(2)(c)
- Legitimate interests in line with Article 6(1)(f)
- Substantial public interest in line with Article 9(2)(g).

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.

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:

- Local authorities
- Government departments or agencies
- Police forces, courts or tribunals

How we store this data

We keep personal information about you while you are visiting our school or Venn office. We may also keep it beyond your visit with our school or Venn office if this is necessary. Our data retention schedule sets out how long we keep information about visitors.

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.

Who we share data with

We keep personal information about you while you work with Venn or one or more of our schools. We may also keep it beyond your work with Venn or one or more of our schools if this is necessary. Our data retention schedule sets out how long we keep information about suppliers.

We do not share information about you with any third party 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:

- Our local authorities – to meet our legal obligations to share certain information with them, such as safeguarding concerns
- Government departments or agencies
- Our regulator, Ofsted
- Suppliers and service providers
- Financial organisations
- Our auditors
- Survey and research organisations
- Health authorities
- Security organisations
- Health and social welfare organisations
- Professional advisers and consultants
- Charities and voluntary organisations
- Police forces, courts or tribunals

Transferring data internationally

We may share personal information about you where different data protection legislation applies:

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 that we hold about you

You have a right to make a 'subject access request' to gain access to personal information that we hold about you.

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 UK 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 your school's Data Protection Lead (School Business Manager/ Office Lead) in the first instance, or the Data Protection Officer.

Data Protection Officer – Helen Turner, 01482 505030, dpo@vennacademy.org.