



## Privacy Notice: Supplier (Sole Trader only)

The following is a description of the way we, Education Swanage Limited operating as The Swanage School, hold and process supplier information.

### Supplier Information

We may gather some information from other customers and other agencies (see the data sharing list below). We will only gather personal information from you if it is required by us to carry out our official functions or to fulfil a contractual obligation. The information we collect, hold and share will normally be limited to:

- Personal details (such as name and contact details)
- Goods and services
- Financial details and
- Visual images (CCTV security system)

We may in certain circumstances such as the provision of professional services or direct services to students hold and share additional personal information including:

- Family, lifestyle and social circumstances
- Vetting checks
- Educational and employment details

We may, where processing is necessary for the purpose of carrying out our official functions including safeguarding also collect, hold and share sensitive data including

- Physical or mental health details
- Racial or ethnic origin
- Religious or other beliefs of a similar nature
- Political opinions as may be required by the duty to prevent extremism
- Sexual/gender orientation
- Offences and alleged offences (including criminal proceedings and outcomes)

### Why we collect and use this information

We use this data:

- To maintain our own accounts and records
- To administer the school properly
- To provide education, welfare and related support services

We also use CCTV and biometric systems to maintain security and for cashless payments.

### Lawful Basis

The lawful basis for the above processing is to:

- enable the School to discharge its responsibilities as a Public Authority.
- comply with contractual obligations
- comply with legal obligations
- enable any "legitimate interest" processing that may be required by the school to fulfil its charitable purpose but only if this function is deemed to fall outside the school's Public Authority remit

## Data Sharing

We may need to share some of your personal information with other organisations including:

- suppliers of other product/services with whom the sole trader's product /service will need to co-exist or interact
- associates and representatives of the sole trader whose personal data we are processing
- professional advisors and consultants
- past, current or prospective customers
- government departments and agencies, to whom we are required by law, to provide information such as HMRC police forces
- Police forces
- courts and tribunals
- security organisations

In the case of sole traders who provide a direct service to students we may also need to share personal information with educators, examining bodies, healthcare professionals as well as social and welfare organisations.

## Data: Its retention and how it is held and processed

Your information will be held for no longer than is necessary. Though the School may, in the public interest, continue to hold some data for archival, statistical and/or research purposes.

Your information will be held and processed securely and will not be transferred outside the European Economic Area (EEA) except to those countries or international organisations which are deemed suitable by the ICO.

The School does not make use of "automated individual decision making" (decisions made by automated means without any human involvement) nor does it use "profiling" (automated processing of personal data to evaluate or predict certain events or behaviours about an individual).

## Your rights

You have the right to request access to information that we hold about you. To make a request for your personal information contact the School's Bursar.

You also have the right to:

- object to processing of personal data that is likely to cause, or is causing, damage or distress
- prevent processing for the purpose of direct marketing
- object to decisions being taken by automated means
- in certain circumstances, have inaccurate personal data rectified, blocked, erased or destroyed;

If you have a concern about the way we are collecting or using your personal data, we request that you raise your concern with us in the first instance. Subsequently, you may contact the Information Commissioner's Office at <https://ico.org.uk/concerns/>

## Contact

If you would like to discuss anything in this privacy notice or make a complaint, please contact the Data Protection Officer at The Swanage School: by letter at the School's address, by telephone on 01929 500599 or by email to [dpo@theswanageschool.co.uk](mailto:dpo@theswanageschool.co.uk) .

## Status of this privacy notice

This privacy notice was last reviewed in October 2024.