

## St Mary's Colchester Visitor Privacy Notice

### Introduction

Welcome to the St Mary's School (Colchester) Limited's ("St Mary's Colchester") privacy notice for visitors to St Mary's Colchester.

St Mary's Colchester respects your privacy and is committed to protecting your personal data. This privacy notice informs visitors to the school as to how we look after your personal data when you visit us and tells you about your privacy rights and how the law protects you.

### 1. Important information and who we are

#### Purpose of this privacy policy

This privacy notice aims to give you information on how St Mary's Colchester collects and processes your personal data when you visit us.

It is important that you read this privacy notice.

#### Controller

St Mary's Colchester is the data controller and responsible for any personal data collected by it when you visit the school (collectively referred to as St Mary's Colchester, "we", "us" or "our" in this privacy notice).

We have appointed a data protection manager who is responsible for overseeing questions in relation to this privacy notice. If you have any questions about this privacy notice, including any requests to exercise your legal rights, please contact Elizabeth Bevan on: [dpm@stmaryscolchester.org.uk](mailto:dpm@stmaryscolchester.org.uk) in the first instance. Our Data Protection Officer (DPO) is the Information Governance Service who can be contacted by email on [iqs@essex.gov.uk](mailto:iqs@essex.gov.uk) or by telephone on 03330 322970.

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK regulator for data protection issues ([www.ico.org.uk](http://www.ico.org.uk)). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

#### Changes to the privacy policy

We keep our privacy policy under regular review.

### 2. The data we collect about you

Personal data, or personal information, means any information about an individual from which that person can be identified. When you visit us we may collect, use, store and transfer different kinds of personal data about you. This includes "Identity Data" being your first name, last name, car registration, name of any company for whom you may be attending the school on behalf of, a photograph of you and your signature.

We do not collect any **Special Categories of Personal Data** about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health, and genetic and biometric data). Nor do we collect any information about criminal convictions and offences.

### 3. How is your personal data collected?

When you visit us, your personal data will be collected via the SignIn App.

#### How we use your personal data

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data when you visit us because it is necessary for our legitimate interest and your interest and fundamental rights do not override those interests. Your personal data may also be used because we need to comply with a legal obligation.

Please see below to find out more about the types of lawful basis that we will rely on to process your personal data.

#### Purposes for which we will use your personal data

We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

Purpose/Activity	Type of data	Lawful basis for processing
Creating an identity badge for you to wear whilst on our premises	Identity Data	Legitimate interest in ensuring we are aware of who is on our premises, for various reasons including safeguarding of children  Compliance with legal obligations
Logging that you are on our premises	Identity Data	Legitimate interest in ensuring we are aware of who is on our premises, for various reasons including safeguarding of children  Compliance with legal obligations
Naming you on the fire register	Identity Data	Compliance with legal obligations

## **Change of purpose**

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

## **4. Disclosures of your personal data**

We may share your personal data with the parties set out below for the purposes set out in the table above:

- Sign In App Ltd

## **5. International transfers**

We do not transfer your personal data outside the UK.

## **6. Data security**

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

## **7. Data retention**

### **How long will you use my personal data for?**

We will only retain your personal data for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory or reporting requirements. We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you. Generally, we will retain your personal data for 90 days.

To determine the appropriate retention period for personal data, we consider the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your

personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal, regulator or other requirements.

In some circumstances you can ask us to delete your data: see your legal rights below for further information.

## **8. Your legal rights**

Under certain circumstances, you have rights under data protection laws in relation to your personal data. Please see below to find out more about these rights:

- Request access to your personal data.
- Request correction of your personal data.
- Request erasure of your personal data.
- Object to processing of your personal data.
- Request restriction of processing your personal data.
- Request transfer of your personal data.
- Right to withdraw consent.

If you wish to exercise any of the rights set out above, please contact us.

### **No fee usually required**

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we could refuse to comply with your request in these circumstances.

### **What we may need from you**

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

### **Time limit to respond**

We try to respond to all legitimate requests within one month. Occasionally it could take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

## **9. Glossary**

### **LAWFUL BASIS**

**Legitimate Interest** means the interest of our school in conducting and managing our school, including the business of the school, to enable us to provide the best possible educational services and the best

experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by contacting us.

**Comply with a legal obligation** means processing your personal data where it is necessary for compliance with a legal obligation that we are subject to.

## **YOUR LEGAL RIGHTS**

You have the right to:

**Request access** to your personal data (commonly known as a “data subject access request”). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.

**Request correction** of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.

**Request erasure** of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

**Object to processing** of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

**Request restriction of processing** of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios:

- If you want us to establish the data’s accuracy.
- Where our use of the data is unlawful but you do not want us to erase it.
- Where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims.
- You have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

**Request the transfer** of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

**Withdraw consent at any time** where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

Reviewed/Approved: July 2024  
Next review: Summer 2025