

Privacy Notice Visitors and Commercial Users on Site

Under the data protection law ([the General Data Protection Regulation](#)), individuals have a right to be informed about how the Trust uses any personal data that we process.

‘Processing data’ refers to collecting, using, storing and sharing data (when appropriate)

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 our Visitors and commercial users on site.

Primitas Learning Partnership, The Old Mining College, Queen Street, Burntwood, WS7 4QH, Tel: 01543 229937 is the ‘data controller’ for the purposes of data protection law and is responsible for how your personal information is processed and for what purposes.

Primitas Learning Partnership is registered for this purpose with the Information Commissioner’s Office (ICO).

The Data Protection Officer (DPO) for Primitas is Jackie Hesslegrave who can be contacted via dpo@primitas.co.uk.

The Personal Data We Hold

Personal data that we may collect, use, store and share (when appropriate) about students includes, but is not restricted to:

We collect many different categories of information, for example:

- Personal details Name, title,
- Contact details, contact preferences, identification numbers e.g. DBS
- Financial details such as business bank details
- Criminal records information such as DBS checks

We also are required to collect and use information that is given additional protection under the GDPR, for example;

- Demographic information required for monitoring equal opportunities
- Photographs and CCTV images (signing in systems and site CCTV)

We may also hold data that we have received from other organisations, including other schools or academies, local authorities and the Department for Education.

Why We Use This Data

The personal data collected is essential, in order for the Trust, and its Academies to fulfil their official functions and meet legal obligations.

We use this data to:

- To enable you to work with us
- To maintain a safe environment for our students and facilitate safe recruitment as part of safeguarding obligations towards students
- To meet the statutory duties placed upon us
- To ensure your health and safety

Use of Personal Data in Automated Decision-Making and Profiling

We do not currently process any visitors or commercial users 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 including the right to object to it.

Our Legal Basis for Using this Data

Depending on the purpose, our use of your information will be legal due to one of the following:

- To meet the terms of a contract
For example: Recording your personal and contact details
- To meet a legal requirement GDPR [Article 6(1)(c)]
For example: Providing information to DfE
- To protect the vital interests of you or someone else GDPR [Article 6(1)(d)]
For example: Giving your contact details to emergency services
- Delivering a public task GDPR [Article 6(1)(b)]
For example: Facilitating the education of students in our Academies

Academy Trusts, under the [Academy Trust Handbook](#) have a legal duty to provide the governance information as detailed above.

Where we use special category personal data we process this under the following exemptions from Section 9 of GDPR:

- Information used in the field of employment GDPR [Article 9(2)(b)]
For example: Using information about ethnic origin for equality monitoring purposes

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 Trust's use of your data.

Change of Purpose

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

We may process your personal information without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

Collecting This Information

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 providing it is mandatory or optional. If it is mandatory, we will explain the possible consequences of not complying and our legal basis for doing so.

How We Store this Data

We keep personal information about visitors and commercial users on site while they are attending academies within our trust. We may also keep it beyond their attendance our trust if this is necessary in order to comply with our legal obligations. Our [Document Retention Policy](#) sets out how long we keep information about Visitors and commercial service users.

Data Sharing

We do not share information about Trustees, Members or Governors with any third party without consent unless the law and our policies or internal procedures allow us to do so.

We routinely share this information with:

- **Local Authority**
To meet our legal obligations to share certain information with it such as safeguarding concerns
- **Judiciary & policy bodies**
To meet our legal obligations to share certain information such as criminal concerns or legislative matters.

Transferring Data Internationally

Where we transfer personal data to a country or territory outside the UK, we will do so in accordance with data protection law.

Rights Regarding Personal Data

Individuals have a right to make a **‘subject access request’** to gain access to personal information that the Trust holds about them.

If you make a subject access request, and if we do hold information about you, we will:

- 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
- 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

Individuals also have the right for their personal information to be transmitted electronically to another organisation in certain circumstances.

If you would like to make a request please [contact our data protection officer](#)..

Other Rights

Under data protection law, individuals have certain rights regarding how their personal data is used and kept safe, including the right to:

- Object to the use of personal data if it would cause, or is causing, damage or distress
- Prevent it being used to send direct marketing
- Object to decisions being taken by automated means (by a computer or machine, without any human intervention)
- In certain circumstances, have inaccurate personal data corrected, deleted or destroyed, or restrict processing

To exercise any of these rights, please [contact our data protection officer](#).

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 on 3rd March 2025.

Complaints

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 follow our complaints procedure](#).

Contact Us

To exercise any of these rights, please [contact our data protection officer](#).