

## Capel Manor College General Privacy Notice

We are the data controller of personal information about you. We are Capel Manor College and we are located at five sites across the Greater London area. Our centre addresses are:

Capel Manor College  
Bullsmoor Lane  
Enfield  
Middlesex  
EN1 4RQ

Capel Manor College  
Crystal Palace Park Centre  
Ledrington Road  
London  
SE19 2BS

Capel Manor College  
Gunnersbury Park  
Centre  
Popes Lane  
Acton  
London  
W3 8LQ

Capel Manor College  
Regent's Park Centre  
Inner Circle  
Regent's Park  
London  
NW1 4NR

Capel Manor College  
Mottingham Lane  
Mottingham  
London  
SE12 9AW

Our Data Protection Officer is Richard Davies. 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: [dataprotection@capel.ac.uk](mailto:dataprotection@capel.ac.uk)

This privacy notice has been prepared in accordance with the General Data Protection Regulation (EU) 2016/679 ("GDPR") and the Data Protection Act 2018.

If you are a visitor to our College or our website, or you are one of our chosen suppliers this notice sets out how we use your personal information. 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.

### As a Visitor to our College or our website

- [the information that we collect about you and why we collect it;](#)
- [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;](#)
- [automated decisions we make about you](#)
- [how we transfer your personal information outside of Europe](#)

### The Information we collect about you and why we collect it

We store and use the personal details you provide to us and information about your visit for marketing and administration purposes.

The information may include details of parents, guardians or carers, people employed by our suppliers who interact with us, employees of agencies with which we interact and general visitors to our sites. The information may include name, address, email address and employer.

We use CCTV at our buildings for the purposes of crime prevention, security and health and safety and will capture imagery of visitors to the College.

### **The legal basis on which we collect and use your personal information**

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 our College effectively and to ensure that the College is safe and secure for all persons visiting;
- 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;
- we have legitimate interest to engage with prospective leads and enquiries for marketing and administrative purposes.

Where we are required by law to hold certain records, then we collect and hold those records to comply with that legal obligation.

### **How long we keep your personal information**

We will only retain your personal data for as long as necessary to fulfil the purposes for which we collected it, including for the purposes of satisfying any legal, accounting, or reporting requirements.

### **When and with whom we share your personal information**

Vendors, consultants and other third party service providers. We may share your data with third party vendors service.

### **Automated decisions we take about you**

We do not make automated decisions using this personal data.

### **How we transfer your personal information outside of Europe**

In general, we do not store or transfer your personal data outside of Europe.

### **As a chosen supplier of services to our College**

- [the information that you give us;](#)
- [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;](#)
- [automated decisions we take about you](#)
- [how we transfer your personal information outside Europe](#)

## **The Information we collect about you and why we collect it**

We will store and use your information for the purposes of managing our suppliers and contracts in respect of the supply of goods and services that our College may need.

In order to engage and manage our suppliers, 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.

You may also be asked to provide details of your occupation and your CV.

In addition, where you visit a building we will collect and process the information set out in the "visitor to our College" section above.

## **The legal basis on which we collect and use your personal information**

Except in the circumstances highlighted below, we process this information on the basis of our legitimate interests:

- we have a legitimate interest in engaging and managing our suppliers; and
- to be able to do so, we need to hold details of who those suppliers are.

Where we are required by law to hold certain records for health and safety purposes, then we hold those records to comply with that statutory obligation.

Where we hold your bank account details, we do so on the basis that it is necessary for us to perform our contract with you.

## **How long we keep your personal information**

We will only retain your personal data for as long as necessary to fulfil the purposes for which we collected it, including for the purposes of satisfying any legal, accounting, or reporting requirements.

We will not keep your personal information for longer than we need it for the purposes we have explained above.

## **How we share your personal information**

We may share the personal information that you give us with the following organisations (or types of organisation) for the following purposes:

- Organisation / type of organisation:  
Supplier of Goods
- Purpose:  
Fulfilment of contractual obligation, meet College legal obligations and to safeguard the health and safety of our staff, students and visitors.
- Organisation / type of organisation:

## Supplier of Services

- Purpose:

Fulfilment of contractual obligation, meet College legal obligations and to safeguard the health and safety of our staff, students and visitors.

- Organisation / type of organisation:

Central Government

- Purpose:

Fulfilment of contractual obligation, meet College legal obligations and to safeguard the health and safety of our staff, students and visitors.

- Organisation / type of organisation:

Local Government

- Purpose:

Fulfilment of contractual obligation, meet College legal obligations and to safeguard the health and safety of our staff, students and visitors.

## **Automated decisions we take about you**

We do not make automated decisions using this personal data.

## **How we transfer your personal information outside of Europe**

In general, we do not store or transfer your personal data outside the European Economic Area (EEA). However, we may transfer your data outside the EEA in the process of using different email systems.

Countries outside the EEA do not always offer the same levels of protection to your personal data, so European law has prohibited transfers of personal data outside the EEA unless the transfer meets certain criteria.

Some of our third parties service providers are based outside the EEA so their processing of your personal data will involve a transfer of data outside the EEA.

Whenever we transfer your personal data out of the EEA, we do our best to ensure a similar degree of security of data by ensuring at least one of the following safeguards is in place:

- We will only transfer your personal data to countries that the European Commission have approved as providing an adequate level of protection for personal data by; or
- Where we use certain service providers, we may use specific contracts or codes of conduct or certification mechanisms approved by the European Commission which give personal data the same protection it has in Europe; or
- If we use US based providers that are part of EU-US Privacy Shield, we may transfer data to them, as they have equivalent safeguards in place.

If none of the above safeguards is available, we may request your explicit consent to the specific transfer. You will have the right to withdraw this consent at any time.

### **Keeping Your Personal Information Secure**

We have appropriate security measures in place to prevent personal information from being accidentally lost, or used or accessed in an unauthorised way. We limit access to your personal information to those who have a genuine business need to know it. Those processing your information will do so only in an authorised manner and are subject to a duty of confidentiality.

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

### **Your Rights Over Personal Information**

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.

### **Changes to our Privacy Policy**

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.