



WHITE ROSE
ACADEMIES

Privacy Notice for Suppliers



Leeds City Academy



Leeds East Academy

Leeds West Academy



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Contents

1. Introduction	2
2. Responsibilities	2
3. Who we are	3
4. Key Contact	3
5. The categories of personal data that we collect, process, hold & share	3
6. How is your personal information collected?	3
5. Lawful basis for processing	4
7. Special Category & Criminal Offence data	4
8. How does this work in practice?	5
9. How we may share personal information	6
10. International Transfers	6
11. Storage, Retention & Disposal	7
12. Data Security	7
13. Your rights	8
14. Complaints	10

1. Introduction

White Rose Academies Trust ("the Trust") is a charitable company limited by guarantee (registration number 07958615) whose registered office is Leeds City Academy, Woodhouse Cliff, Leeds, LS6 2LG. The Trust is the Data Controller for all the academies within the Trust.

This privacy notice describes how we collect and use personal information about you before, during and after your relationship with us as a supplier, in accordance with the UK General Data Protection Regulation (UK GDPR). The Trust is a "data controller". This means that we are responsible for deciding how we hold and use personal information about you as well as how you use data that we supply to you.

We are required under data protection legislation to notify you of the information contained in this privacy notice.

We will also explain what rights you have with regards to your personal data and how you can exercise those rights.

You can find details on specific areas of our privacy notice in the sections below:

1. Who we are
2. Key Contact
3. The categories of personal data that we collect, process, hold & share
4. How is your personal information collected?
5. Lawful basis for processing
6. Special Category & Criminal Offence Data
7. How does this work in practice?
8. How we may disclose personal information
9. International Transfers
10. Storage, Retention & Disposal
11. Your rights
12. Data Security
13. Complaints

This notice applies solely to data that we process on data subjects who are classed as suppliers of goods and services to the Trust and its academies.

2. Responsibilities

The Trust Data Protection Officer is responsible for ensuring that this notice is made available to data subjects prior to the Trust and its Academies collecting or processing their personal data.

The Trust and its Academies who interact with data subjects are responsible for ensuring that this notice is drawn to the data subject's attention and where necessary their consent to the processing of their data is secured.

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

3. Who we are

White Rose Academies Trust is a Multi Academy Trust that operates within the City of Leeds in West Yorkshire. Our organisation encompasses education provision across both the Primary and Secondary sector.

4. Key Contact

Please read this notice carefully. In the event that you have any questions or concerns regarding the processing of your data you can contact:

GDPR@whiteroseacademies.org

5. The categories of personal data that we collect, process, hold & share

We collect information from you for one or more of the following purposes:

- Setting up an account on our central Purchase Ledger
- Making payment for supply of goods/services
- Dealing with any queries regarding Purchase Orders or payments due to you
- Business management, administrative and planning purposes, including accounting and auditing
- Responding to complaints or investigations from stakeholders or our regulators
- Sending you communications connected with your role as a supplier
- Complying with health and safety obligations
- Complying with safeguarding obligations
- To prevent fraud
- To comply with the law regarding data sharing
- For the detection and prevention of crimes
- For the establishment, exercise or defence of legal claims.
- In appropriate circumstances to liaise with regulatory bodies, the Department for Education, the DBS and the Local Authority about your suitability to be a supplier or in connection with other regulatory matters

6. How is your personal information collected?

We collect personal information about suppliers at the point whereby you are requested by an Academy within the Trust to be set up as a supplier on our central Purchase Ledger. Contact is made by the Finance Team at the Trust to ensure that data stored about you is correct.

If by any means a request is made to the Trust to amend your data then you will be contacted again to ensure the data we have on your record is correct. If any of your personal data changes then it will be your responsibility to inform the Trust regarding these changes.

5. Lawful basis for processing

When processing your personal data we will rely on one of the following grounds as set out in Article 6 of UK GDPR:

- a) Contractual Obligation: The main lawful basis used for the processing of supplier personal data is 'contractual obligation' as we engage our third party supplier under a written contract.
- b) Legal Obligation: Many of our record keeping requirements are set by parliament through statutory legislation.
- c) Vital Interests: Sometimes we need to process data to protect the life of an individual such as in an emergency situation or when an individual is at risk of serious harm.
- d) Public Task: The processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller.
- e) Consent: There may be occasions when we seek your consent to process particular types of data. Where we have obtained consent to use personal data, this consent can be withdrawn at any time. We will make this clear when we ask for consent and explain how consent can be withdrawn.
- f) If you have changed your mind, or you are unhappy with our use of your personal data and cannot locate the contact details for your academy to withdraw your consent, please let us know by contacting the Trust Data Protection Officer (DPO) using the details in Section 2 of this privacy notice.

Some of the reasons listed above for collecting and using your personal data overlap, and there may be several grounds which justify the Trust's use of your data.

7. Special Category & Criminal Offence data

Under UK GDPR there are certain types of data that are recognised as needing greater protection due to its sensitive nature. We process some types of special category data such as racial or ethnic origin, religious or philosophical beliefs, trade union membership and data concerning sex life as well as data concerning health.

To process this type of data an organisation is required to identify an Article 9 exemption as well as an Article 6 lawful basis as set out in section 5 above.

The Trust will also process criminal offence data of its suppliers as part of our child protection obligations set out in law as well as the accompanying Department for Education's statutory guidance 'Keeping Children Safe in Education'.

8. How does this work in practice?

To assist with your understanding of how this all works in practice we have prepared a table.

Where White Rose Academies Trust and its Academies have obtained your personal data from another source other than the data subject (you), the source is also identified below :

<u>The data being processed</u>	<u>Our lawful basis</u>	<u>What else we need to tell you</u>
Personal contact details such as name, addresses, telephone numbers and personal email addresses	Contractual obligation	
Bank account details provided by you in order to make payment for goods and/or services supplied	Contractual obligation	
CCTV Images obtained if supply of goods/services necessitates your presence on our premises	Public Task	As our academies are monitored by CCTV we will inevitably record some images that may be classed as special category data. Our Article 9 exemption for this data would be that processing is necessary for the establishment, exercise or defence of legal claims.
Criminal conviction data collected as part of the DBS process	Legal obligation: Education (Independent School Standards) (England) Regulations 2014	Should a DBS check be required we will be provided with the relevant details by your employer. In addition, we rely on an Article 9 exemption as processing is necessary for reasons of substantial public interest, this being

		the safeguarding of children and of individuals at risk.
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9. How we may share personal information

We may have to share your data with third parties, including third-party service providers and other organisations. In particular, we may share your data with organisations including, but not limited to, the following:

- Finance system provider
- Banking provider
- HMRC
- the Local Authority
- the Department for Education
- the Education & Skills Funding Agency
- other academies or departments within the White Rose Academies Trust
- the Disclosure and Barring Service
- the Police or other law enforcement agencies
- our legal advisors
- other external consultants
- insurance providers
- Trust Auditors

We require third parties to respect the security of your data and to treat it in accordance with the law. Some of the organisations referred to above are joint data controllers. This means we are all responsible to you for how we process your data.

We do not share information about our suppliers with any third party without consent unless the law and our policies allow us to do so.

White Rose Academies Trust reserves the right to use or disclose any personal information as needed to satisfy any law, regulation or legal request, to fulfil your requests, or to cooperate in any law enforcement investigation or an investigation on a matter of public safety.

10. International Transfers

A small number of data processors used by the Trust are based outside the UK and so their processing of your personal data will involve a transfer of data outside the UK. These processors are predominantly applications and information systems used by the Trust to facilitate our teaching provisions (such as Seesaw & ABCYA). Some UK based processors may also use sub-processors (such as cloud service providers) which are located outside of the UK.

Whenever we transfer your personal data out of the UK, the Trust will ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- a. We will transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data by the Secretary of State.
- b. Where we use certain service providers who are outside of the adequacy regime, we will use standard data protection clauses approved by the Secretary of State which give personal data the same protection it has in the UK.

11. Storage, Retention & Disposal

The Trust will only store the minimum amount of personal data necessary to provide our services to you. Your data will be stored securely and will be subject to access controls.

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

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 as well as the applicable legal requirements.

In some circumstances we may anonymise your personal information so that it can no longer be associated with you, in which case we may use such information without further notice to you. Once you are no longer a supplier to the Trust we will retain and securely destroy your personal information in accordance with applicable laws and regulations.

All data will be disposed of in a secure and confidential manner. All electronic and physical data will be disposed of in such a manner that it cannot be reconstituted by any third party.

12. Data Security

We have put in place measures to protect the security of your information. Details of these measures are available upon request.

Third parties who are processing personal data on our behalf will only process your personal information on our instructions and where they have agreed to treat the information confidentially and to keep it secure.

We have put in place appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way including alteration or disclosure. In addition, we limit access to your personal information to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal information on our instructions and they are subject to a duty of confidentiality. Details of these measures may be obtained from the DPO.

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

13. Your rights

Under the United Kingdom General Data Protection Regulation 2018, you have the following rights: The right to be informed

As a data controller, we are obliged to provide clear and transparent information about our data processing activities. This is provided by this privacy notice and any related communications we may send you.

The right to rectification

When you believe we hold inaccurate or incomplete personal information about you, you may exercise your right to correct or complete this data. Please keep us informed if your personal information changes whilst you are a supplier of goods and/or services to the Trust.

This may be used with the right to restrict processing to make sure that incorrect/incomplete information is not processed until it is corrected.

The right to erasure

Where no overriding legal basis or legitimate reason continues to exist for processing personal data, you may request that we delete the personal data. This includes personal data that may have been unlawfully processed. We will take all reasonable steps to ensure erasure. This is also known as 'the right to be forgotten'.

The right to access

You may request a copy of the personal data we hold about you free of charge. Once we have verified your identity and, if relevant, the authority of any third-party requester, we will provide access to the personal data we hold about you as well as the following information:

- a) The purposes of the processing
- b) The categories of personal data concerned
- c) The recipients to whom the personal data has been disclosed
- d) The retention period or envisioned retention period for that personal data

- e) When personal data has been collected from a third party, the source of the personal data

If there are exceptional circumstances that mean we can refuse to provide the information, we will explain the same. If requests are malicious or manifestly unfounded we reserve the right to refuse them. If answering requests is likely to require additional time or occasions unreasonable expense (which you may have to meet), we will inform you.

The right to restrict processing

You may ask us to stop processing your personal data. We will still hold the data, but will not process it any further. This right is an alternative to the right to erasure. If one of the following conditions applies you may exercise the right to restrict processing:

- a) The accuracy of the personal data is contested.
- b) Processing of the personal data is unlawful.
- c) We no longer need the personal data for processing but the personal data is required for part of a legal process.
- d) The right to object has been exercised and processing is restricted pending a decision on the status of the processing.

The right to data portability

You may request your set of personal data be transferred to another controller or processor, provided in a commonly used and machine-readable format. This right is only available if the original processing was on the basis of consent, the processing is by automated means and if the processing is based on the fulfilment of a contractual obligation.

The right to object

The right to object to us processing certain types of information when:

- a) Processing is based on legitimate interest;
- b) Processing is for the purpose of direct marketing;
- c) Processing is for the purposes of scientific or historical research; or
- d) Processing involves automated decision-making and profiling.

The Information Commissioner's Office provides more information about these rights.

If you would like to contact us about any of these rights, please email us at GDPR@whiteroseacademies.org or write to us at:

Data Protection Officer
Leeds City Academy
Woodhouse Cliff
Leeds
LS6 2LG

We will respond to you within 30 days of receiving your request and you will not be charged for this service.

14. Complaints

Should you wish to discuss a complaint, please feel free to contact us using the details provided above. All complaints will be treated in a confidential manner.

Should you feel unsatisfied with our handling of your data, or about any complaint that you have made to us about our handling of your data, you are entitled to escalate your complaint to a supervisory authority. For the UK, this is the ICO (Information Commissioner's Office), which is also our lead supervisory authority. The ICO's contact information can be found at <https://ico.org.uk/global/contact-us/>.