



Visitor and Contractor Privacy Notice

SIPS Education Ltd is committed to protecting your personal information and being transparent about what information we hold about you. We take our responsibilities very seriously and we continuously strive to be fully compliant with General Data Protection Legislation (GDPR) 2018.

SIPS is a 'data controller' for the purposes of GDPR. This privacy notice is for all customers and visitors who work at and visit SIPS Education. It is intended to give you a clear explanation about your rights, how we keep personal information safe, the legal basis we rely on to use information and the purposes for which we use the information we collect from you and relevant third parties.

The personal data we hold

The personal data we may collect, store, use and share about you includes, but is not restricted to that captured via CCTV systems; and accident and incident reporting processes.

CCTV System

A Closed Circuit Television (CCTV) system, is installed as part of our commitment to safety and security. We use the CCTV system fairly, within regulatory guidelines and law, with the personal privacy of individuals using the building and the objective of recording incidents for safety and security in mind. Security cameras are clearly visible and accompanied by signs indicating that CCTV is in use. SIPS Education operates a robust policy governing the use of the CCTV system; in case of queries, please contact our Data Protection Officer.

The communal areas of Guardian House, of which SIPS Education are located, have CCTV in operation, which is operated by the landlord, Bond Wolfe.

Accidents and Incidents Reporting

In the event of an accident or incident, SIPS Education Ltd will request the

visitor/contractor to complete an Incident Report Form. This will include personal data from the injured party or person suffering from ill health, such as name, address, date of birth, next of kin and details of the incident to include any relevant medical history. The data is collected as SIPS Education has a legal duty to document workplace incidents/accidents and to report certain types of accidents, injuries and dangerous occurrences arising out of its work activity to the relevant enforcing authority.

Incidents and accidents will be investigated to establish what lessons can be learned to prevent such incidents/accidents re-occurring including introduction of additional safeguards, procedures, information, instructions and training, or any combination of these. Monitoring is undertaken but on an anonymised basis. The information is also retained in the event of any claims for damages.

Legal Basis for processing

The legal basis of processing is set out as follows:

| Area | Legal basis | Information |
|-----------------------------------|----------------------|---|
| CCTV | Legitimate Interests | To ensure that there is a safe environment for every person visiting SIPS Educations premises |
| Accidents and Incidents reporting | | |

Data sharing

We do not share personal information with any third party (unless otherwise stated in this privacy notice) without consent, unless the law requires us to do so.

Disclosures

SIPS Education Ltd would only disclose information from the CCTV system, which is required to detect or prevent crime. This is usually on receipt of a Police issued personal data request form, required under Police Investigations Section 29(3) of DPA 1998. There are instances such as prevention of threat to life or serious injuries, where personal information may be provided without a signed police DPA form.

Security of your personal data

We have appropriate safeguards in place (both in terms of our procedures and the technology we use) to keep your personal information as confidential and as secure as possible. We will:

- protect data against accidental loss
- prevent unauthorised access, use, destruction or disclosure
- ensure business continuity and disaster recovery
- restrict access to personal information
- train staff and contractors on data security
- manage third party risks, through use of contracts and security reviews

Your data will only be accessible to authorised staff. We will ensure, as far as reasonably possible, that any third parties we use for processing your personal information will do the same.

Information will be stored only for as long as it is needed or required by statute and will be disposed of appropriately. As part of the recruitment process, data will be held for a period of 6 months for unsuccessful candidates.

We undertake to report any personal data breaches in accordance with the General Data Protection Regulation requirements.

Your Rights as a Data Subject

Data subjects have the following rights with regards to their personal information, as follows:

- Confirmation that their personal data is being processed
- Access to a copy of the data
- The purpose of the data processing
- The categories of personal data concerned
- Who the data has been, or will be, shared with
- How long the data will be stored for, or if this isn't possible, the criteria used to determine this period
- Where relevant, the existence of the right to request rectification, erasure or restrictions, or to object to such processing
- The right to lodge a complaint with the ICO or another supervisory authority
- The source of the data, if not the individual

- The safeguards provided if the data is being transferred internationally

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

Subject Access Requests

If you wish to access the information held on you by SIPS Education, you may submit a Subject Access Request. Such request must be directed to the Data Protection Officer. A request can be made verbally or in written format.

SIPS Education is registered as a Data Controller with the Information Commissioner. The Director for Corporate Risk Management, Laura Hadley is the Data Protection Officer for the Company. The Deputy Data Protection Officer for the Company is the Service Manager for Safety Management Services, Amanda Moore.

Complaints.

We take any complaints about our collection and use of personal information very seriously. 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 contact our Data Protection Officer or Deputy Data Protection Office, as noted above.

You can also report a concern online to the Information Commissioners Office at <https://ico.org.uk/concerns>

Telephone Number 0303 123 1113

Address: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF 12.

Changes to this privacy notice

This privacy notice may be updated from time to time. We encourage you to check this privacy notice periodically to ensure you understand how your data will be used and to see any minor updates. If material changes are made to the privacy notice, for example, how we would like to use your personal data, we will provide a more prominent notice (for example, email notification or correspondence of privacy notice changes).