



PRIVACY NOTICE FOR VISITORS

1. ABOUT THIS PRIVACY NOTICE

City College Plymouth is committed to protecting the privacy of personal information it obtains from you or is given on your behalf during and after your visit to the College. This privacy notice describes how the College will collect and use your personal information and also explains your rights regarding your personal information.

The College will use your personal information in accordance with the General Data Protection Regulation (EU) 2016/679 (“GDPR”), the Data Protection Act 2018 and any other applicable laws and regulations which relate to data protection and privacy.

2. DATA CONTROLLER

City College Plymouth is the data controller responsible for your personal data (collectively referred to as “the College”, “we”, “us” or “our” in this privacy notice).

We are:

CITY COLLEGE PLYMOUTH
Kings Road, Devonport, Plymouth, PL1 5QG
01752 305300

info@cityplym.ac.uk

www.cityplym.ac.uk

City College Plymouth is deemed to be a public authority under the definition within the Freedom of Information Act 2000.

City College Plymouth is registered with the Information Commissioner’s Office (ICO) and our ICO registration number is Z49441564.

3. DATA PROTECTION OFFICER

The Data Protection Officer for the College is Roger Henderson, Legal Officer. If you have any questions about this notice or the ways in which we use your personal information, including any requests to exercise your rights, please contact the:

Data Protection Officer, City College Plymouth
Kings Road, Devonport, Plymouth, PL1 5QG
01752 305735

legal@cityplym.ac.uk

4. YOUR RIGHTS REGARDING DATA

The General Data Protection Regulation (GDPR) ensures that individuals have the following rights in relation to personal and special category information processed by the College.

Requests to exercise any of the rights below can be made by contacting the Data Protection Officer for the College, Roger Henderson, at:

City College Plymouth
Kings Road, Devonport, Plymouth, PL1 5QG
01752 305735
legal@cityplym.ac.uk

- **Right to be informed**
You may ask the College what personal information we are holding, whether electronically or on paper.
- **Right of access/subject access request**
You may ask the College for a copy of your personal information held by the College. This will be provided free of charge except where a request is manifestly unfounded, excessive or repetitive, in which case a reasonable fee can be charged, based on the administrative cost of providing the information.
- **Right to rectification**
You have the right to ask the College to rectify any personal data if it is inaccurate or incomplete. If the College has disclosed your personal information to third parties, the College will inform them of the rectification where possible.
- **Right to erasure/right to be forgotten**
You have the right in certain circumstances, such as where the College's use of your personal information is based on your consent and the College has no other legal basis to use your personal information, to ask the College to delete your personal information.
- **Right to restrict processing**
You have the right in certain circumstances, such as where the College no longer needs your personal information, to request that the College restricts its' use of your personal information.
- **Right to data portability**
You have the right where processing is based on consent or the performance of a contract and is carried out by automated means, to ask the College to provide you with a copy of your personal information in a structured, commonly used, machine readable format.

➤ **Right to object**

Where processing has been based on legitimate interests, the performance of a task in the public interest or for direct marketing purposes, you can object to the processing. The College, however, may still continue to process and hold your personal information if it can demonstrate legitimate grounds for processing or the processing is for the establishment, exercise or defence of legal claims.

➤ **Right to complain**

If you have any questions about your personal information or the way in which your information is being used, please contact the Data Protection Officer for the College, Roger Henderson, at:

City College Plymouth
Kings Road, Devonport, Plymouth, PL1 5QG
01752 305735
legal@cityplym.ac.uk

If you wish to complain about how your complaint was handled or appeal against any decision made following a complaint, you may lodge a further complaint via the College's Talkback complaint procedure.

This can be done by emailing talkback@cityplym.ac.uk , by telephoning 01752 305707 or by writing to the Talkback Team at City College Plymouth. Further details can be found on the College website.

You may also complain to the Information Commissioners' Office (ICO) which is the UK supervisory authority for data protection issues. The details are:

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire SK9 5AF

0303 1231113 or 01625 545745
casework@ico.org.uk
<https://ico.org.uk/>

5. DATA PROTECTION PRINCIPLES

The data protection laws state your personal information must be collected and used fairly, stored safely and not disclosed unlawfully. These rules apply whether your information is stored electronically, on paper or on other materials.

The College will ensure your personal information will be held and processed in accordance with the principles set out in the GDPR, namely that personal information must:

- be processed lawfully, fairly and transparently
- be obtained only for specific, lawful purposes
- be adequate, relevant and not excessive
- be accurate and kept up-to-date
- not be held for any longer than is necessary
- be processed in accordance with the rights of the data subject
- be protected by appropriate security measures
- not be transferred outside the European Economic Area, unless that country or territory also ensures an adequate level of data protection.

6. DEFINITIONS

For definitions of “personal information” or “special category information” or what is “processing”, please [click here](#).

7. THE PERSONAL INFORMATION WE COLLECT AND USE

As a visitor to the College, we will collect and process your personal information, which may include:

- name, address, date of birth, contact details, phone numbers, e-mail address
- visitor book information
- visitor badge details
- car parking permits
- company/ organisation name and details
- banking/financial details
- car/motorbike registration number
- CCTV surveillance footage
- education and employment details if enquiring about a course or attending an open event
- further additional information specific to your visit. For example, for PL1 restaurant and Deli visitors, details of any food allergies, access needs or other special requirements; for hair and beauty, Stars or Creative Solutions visitors, details of any allergies, health conditions or other special requirements; for sports therapy, sport, gym or fitness class visitors, details regarding health , injuries, medication, etc.

8. OUR USE OF YOUR PERSONAL INFORMATION

As part of your visit to the College we store and use your personal details and information about your visit for the purposes of managing and operating the College. This includes its clubs, societies and extra-curricular activities.

The College has an obligation to safeguard the wellbeing of its visitors, students, staff and customers. The College processes data for the purpose of recording which individuals are present on College premises and at what times.

The College must manage and comply with health and safety regulations, including information for the proprietary online health and safety system OSHENS including accident and incident investigations, auditing and risk assessment; also information is needed for the EVOLVE educational visit management system.

The College uses CCTV surveillance for the purposes of crime prevention, security and health and safety and therefore, the College will capture and process images of visitors to the College.

9. THE LEGAL BASIS FOR COLLECTING AND USING YOUR PERSONAL INFORMATION

Your personal information is processed on the basis of our legitimate interests:

We have a legitimate interest during your visit in wishing to interact with you to manage and operate the College effectively and to ensure that the College is safe and secure for all visitors. In order to do this, the College needs to have and understand details of who is present on College sites, the purpose of their visit and to be able to communicate with them.

Where your information is special category personal information, e.g. health/medical information or criminal record details, we will process it because there is a substantial public interest for us to do so.

In addition, some information is necessary to comply with legal or statutory obligations and also to ensure performance of contracts.

Marketing information is processed on the basis of a combination of our legitimate business interests and on the basis of consent (which can be withdrawn at any time).

10. SHARING OF YOUR PERSONAL INFORMATION

We may share your personal information with numerous individuals, organisations or third parties, including:

- College staff, management and governance
- College pastoral support and Student Journey

- College safeguarding personnel and external safeguarding authorities
- current and potential employers/apprentice organisations
- career advisors and organisations including Careers South West
- first aiders and emergency services such as ambulance/paramedics
- contracted transport operators such as Stagecoach and Citybus

Personal and special category information may be disclosed without your consent to the Police, probation and other law enforcement agencies where disclosure of your information is needed to prevent crime/fraud, apprehend offenders assist with court proceedings and/or to protect and safeguard the rights, property or safety of the College, its students, staff and all other users.

11. HOW LONG WE KEEP YOUR PERSONAL INFORMATION FOR

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

CCTV images will be retained for a minimum of 20 days but will be automatically deleted within **28 days**. Images retained for legal, criminal or civil procedures will be stored on CD and kept securely by the Estates Manager.

PL1 and Deli visitors- information will be kept for **one year** following your last visit/contact.

Sports/gym/fitness class visitors- information will be kept for as long as you attend sessions and then for **one year** after your last visit/leaving.

Hair and Beauty, Stars and Creative Solutions visitors- information will be kept for as long as you are a client and then for **two years** after your last appointment/leaving.

Open events and course enquiries which do not convert to an application for a course are kept for **two years** from the event/enquiry.

Where visitors have consented to photographs/video for marketing purposes, these images will be kept for **two years** from the date of consent.

The College is obliged to keep certain information for a longer period in order to comply with statutory/legal obligations, eg safeguarding, Health and Safety legislation. Further information can be found in the College Retention policy.

12. CHANGES TO OUR PRIVACY NOTICE

We keep our privacy notices under regular review and reserve the right to make small changes to ensure notices remain up to date and accurate. Significant changes to this privacy notice will be made and approved by the Senior Leadership Team. This notice will be reviewed annually.

Date June 2018

Next review date June 2019