

Supplier Privacy Notice

Wellspring Academy Trust (“the Trust”) is committed to protecting the privacy and security of your personal information. The Trust is a charitable company limited by guarantee (registration number 08120960) whose registered office is Digital Media Centre, County Way, Barnsley, England, S70 2JW. The Trust is the Data Controller for all the academies within the Trust. The Data Protection Officer for the Trust is Jonny Wathen, who can be contacted at: privacy@wellspringacademies.org.uk 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 General Data Protection Regulation (GDPR). The Trust is a “data controller”. This means that we are responsible for deciding how we hold and use personal information about you. We are required under data protection legislation to notify you of the information contained in this privacy notice.

Data protection principles

We will comply with data protection law. This says that the personal information we hold about you must be:

- a) Used lawfully, fairly and in a transparent way.
- b) Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes.
- c) Relevant to the purposes we have told you about and limited only to those purposes.
- d) Accurate and kept up to date.
- e) Kept only as long as necessary for the purposes we have told you about. f) Kept securely.

The type of information we hold about you

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data). There are “special categories” of more sensitive personal data which require a higher level of protection. We will collect, store, and use the following categories of personal information about you:

- Personal contact details such as name, addresses, telephone numbers, and personal email addresses
- Bank account details provided by you in order to make payment for goods/services supplied
- CCTV footage obtained if supply of goods/services necessitates your presence on our premises

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 with you 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.

How we will use information about you

We will only use your personal information when the law allows us to. Most commonly, we will use your personal information in the following circumstances:

- a) Where we need to perform the contract we have entered into with you
- b) Where we need to comply with a legal obligation
- c) Where we need to protect your interests (or someone else's interests)
- d) Where it is needed in the public interest or for official purposes

Situations in which we will use your personal information

The situations in which we will process your personal information are listed below.

- 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
- 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

Some of the above grounds for processing will overlap and there may be several grounds which justify our use of your personal information. In addition, the Academy may also use CCTV cameras around the Academy site for security purposes and for the protection of staff and pupils. CCTV footage may be referred to during the course of investigating. CCTV footage involving suppliers will only be processed to the extent that it is lawful to do so. Please refer to the individual Academy CCTV policy for more details.

If you fail to provide personal information

If you fail to provide certain information when requested, we may be prevented from complying with our legal obligations or we may be unable to discharge our obligations which may be in the public interest or for official purposes.

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.

Please note that 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.

Data sharing

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
- the Wellspring Academy 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.

Why might we share your personal information with third parties?

We will share your personal information with third parties where required by law, where it is needed in the public interest or for official purposes.

Which third-party service providers process your personal information?

“Third parties” includes third-party service providers (including contractors and designated agents). The following third-party service provider’s process personal information about you for the following purposes: finance system and banking provider to the Trust for the purposes of making BACS payments to you for goods/services supplied.

How secure is your information with third-party service providers?

All our third-party service providers are required to take appropriate security measures to protect your personal information in line with our policies. We do not allow our third-party service providers to use your personal data for their own purposes. We only permit them to process your personal data for specified purposes and in accordance with our instructions.

What about other third parties?

We may share your personal information with other third parties, for example if there are changes to the Trust in future. We may also need to share your personal information with a regulator or to otherwise comply with the law.

From time to time, we may disclose your personal data in response to a request for information pursuant to the Freedom of Information Act 2000 or following a data subject access request.

We may approach you for your consent but, in any event, we will only disclose your personal data if we are satisfied that it is reasonable to do so in all the circumstances. This means that we may refuse to disclose some or all of your personal data following receipt of such a request.

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, altered or disclosed. 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.

DATA RETENTION: How long will we use your information for?

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. Details of retention periods for your personal information are available in our Data Retention Policy. 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, and 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.

RIGHTS OF ACCESS, CORRECTION, ERASURE, AND RESTRICTION: Your duty to inform us of changes

It is important that the personal information we hold about you is accurate and current. Please keep us informed if your personal information changes whilst you are a supplier of goods/services to the trust.

Your rights in connection with personal information

Under certain circumstances, by law you have the right to:

- **Request access** to your personal information (data subject access request). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.
- **Request correction** of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
- **Request erasure** of your personal information. This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing (see below).
- **Object to processing** of your personal information where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground. You also have the right to object where we are processing your personal information for direct marketing purposes.
- **Request the restriction** of processing of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.
- **Request the transfer** of your personal information to another party.

If you want to review, verify, correct or request erasure of your personal information, object to the processing of your personal data, or request that we transfer a copy of your personal information to another party, please contact the DPO in writing.

The legal timescales for the trust to respond to a Subject Access Request is one calendar month. As the trust has limited staff resources outside of term time, we encourage you to submit any Subject Access Requests during term time and to avoid sending a request during periods when the Trust is closed or is about to close for the holidays where possible. This will assist us in responding to your request as promptly as possible. For further information about how we handle Subject Access Requests, please see our Data Protection Policy.

No fee usually required

You will not have to pay a fee to access your personal information (or to exercise any of the other rights). However, we may charge a reasonable fee if your request for access is manifestly unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances.

What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access the information (or to exercise any of your other rights). This is another appropriate security measure to ensure that personal information is not disclosed to any person who has no right to receive it.

Data protection officer

We have appointed a data protection officer (DPO) to oversee compliance with this privacy notice. If you have any questions about this privacy notice or how we handle your personal information, please contact the DPO Jonny Wathen at: privacy@wellspringacademies.org.uk

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues.

You can contact the Information Commissioners Office on 0303 123 1113 or via email <https://ico.org.uk/global/contact-us/email/> or at the Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire. SK9 5AF.