Privacy Notice for Suppliers

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1. Introduction

Under UK data protection law, individuals have a right to be informed about how our trust uses any personal data that we hold about them. We comply with this right by providing 'privacy notices' (sometimes called 'fair processing notices') to individuals where we are processing their personal data.

This privacy notice explains how we collect, store and use personal data about suppliers of goods and services that the trust contracts with, including their individual representatives, employees, or agents. References to "you" in this privacy notice cover all these individuals.

The trust, The Propeller Academy Trust, Fitzwaryn School, Denchworth Road, Wantage, OX12 9ET, is the 'data controller' for the purposes of UK data protection law.

2. The personal data we hold

Personal data that we may collect, use, store and share (when appropriate) about you includes, but is not restricted to:

- Your name
- Contact details
- References, CVs and details of an individual's employment history, if collected as part of a bidding, tendering or engagement process
- Bank details and other financial information where it relates to an individual, such as if you are operating as a sole trader
- Any other personal information necessary to fulfill the terms of a contract we have with you
- Information relating to visits to the school, e.g. the individual's company or organization name, arrival and departure time, vehicle number plate
- Information about your use of our information and communication systems, equipment and facilities

If our contract with you requires you to visit or carry out any work at our school sites/premises, our privacy notice for visitors to the school will also apply. The visitor privacy notice is available on the trust's website https://www.thepropelleracademytrust.org.uk/page/?title=Data+Protection&pid=24.

We may also collect, use, store and share (where appropriate) information about you that falls into 'special categories' of more sensitive personal data. This includes, but is not restricted to:

- Information about any access arrangements that may be required
- Photographs for identification purposes
- CCTV images captured in school

We may also hold data about you that we have received from other organisations, including other schools or trusts and local authorities.

3. Why we use this data

We collect and use the data listed above to:

a) Decide whether to engage you

b) Fulfil the terms of our contract with you, including payment

c) Keep accurate records of the suppliers that we use

d) Identify you while on the school site, and keep all individuals safe

e) Keep pupils and staff safe while you are on site

f) Keep accurate records of visits to school

g) Make sure our information and communication systems, equipment and facilities (e.g. school computers) are used appropriately, legally, and safely

h) Meet legal requirements placed upon us

If you fail to provide certain information when requested, we may not be able to perform the contract we have entered into with you, or we may be prevented from complying with our legal obligations.

We will only use your personal information for the purposes for which we have 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 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.

3.1 Use of your personal data for marketing purposes

Where you have given us consent to do so, we may need to send you marketing information by email or text prompting school events, campaigns charitable causes or services that may be of interest to you.

You can withdraw consent or 'opt out' of receiving these emails and/or texts at any time by selecting the 'Unsubscribe' link at the bottom of such communication, or by contacting us (see 'Contact us' below).

3.2 Use of your personal data in automated decision-making and profiling

We do not currently process any suppliers' personal data through automated decision-making or profiling. If this changes in the future, we will amend any relevant privacy notices in order to explain the processing to you, including your right to object to it.

3.3 Use of your personal data for filtering and monitoring purposes

While you're in any of our trust's schools, we may monitor your use of our information and communication systems, equipment and facilities (e.g. school computers). We do this so that we can:

- Comply with health and safety and other legal obligations

- Comply with our policies e.g. child protection policy, IT acceptable use policy and our legal obligations
- Keep our network(s) and devices safe from unauthorised access, and prevent malicious software from harming our network(s)

4. Our lawful basis for using this data

Our lawful bases for processing your personal data for the purposes listed in section 3 above are as follows:

- For the purposes of a), b), in accordance with the 'contract' basis – we need to process personal data to fulfil a contract with you or help you enter into a contract with us.
- For purposes of e), h), in accordance with the 'legal obligation' basis – we need to process data to meet our responsibilities under law.
- For the purposes of a), c), d), e), f), g), in accordance with the 'legitimate interest' basis where there's minimal privacy impact and we have a compelling reason.

Where you have provided us with consent to use your data, you may withdraw this consent at any time. We will make this clear when requesting your consent, and explain how you would go about withdrawing consent if you wish to do so.

4.1 Our basis for using special category data

For 'special category' data, we only collect and use it when we have both a lawful basis, as set out above, and 1 of the following conditions for processing as set out in UK data protection law:

- We have obtained your explicit consent to use your personal data in a certain way
- We need to perform or exercise an obligation or right in relation to employment, social security or social protection law
- We need to protect an individual's vital interests (i.e. protect your life or someone else's life), in situations where you're physically or legally incapable of giving consent
- The data concerned has already been made manifestly public by you
- We need to process it for the establishment, exercise or defence of legal claims
- We need to process it for reasons of substantial public interest as defined in legislation
- We need to process it for health or social care purposes, and the processing is done by, or under the direction of, a health or social work professional or by any other person obliged to confidentiality under law
- We need to process it for public health reasons, and the processing is done by, or under the direction of, a health professional or by any other person obliged to confidentiality under law
- We need to process it for archiving purposes, scientific or historical research purposes, or for statistical purposes, and the processing is in the public interest

For criminal offence data, we will only collect and use it when we have both a lawful basis, as set out above, and a condition for processing as set out in UK data protection law. Conditions include:

- We have obtained your consent to use it in a specific way
- We need to protect an individual's vital interests (i.e. protect your life or someone else's life), in situations where you're physically or legally incapable of giving consent
- The data concerned has already been made manifestly public by you
- We need to process it for, or in connection with, legal proceedings, to obtain legal advice, or for the establishment, exercise or defence of legal rights
- We need to process it for reasons of substantial public interest as defined in legislation

5. Collecting this data

We will only collect and use your data when the law allows us to (as detailed above in section 4 of this notice). While the majority of information we collect about you is mandatory, there is some information that can be provided voluntarily.

Whenever we seek to collect information from you, we make it clear whether you must provide this information (and if so, what the possible consequences are of not complying), or whether you have a choice.

Most of the data we hold about you will come from you, but we may also hold data about you from:

- Your employer or organisation
- Other schools, trusts, or public bodies
- Professional refeers
- Local authorities
- Government departments or agencies
- Police forces, courts or tribunals

6. How we store this data

We keep personal information about you while you work with our trust. We may also keep it beyond your work with our trust if this is necessary to comply with our legal requirements or to meet our regulatory requirements. Our data retention schedule sets out how long we keep information about suppliers. Please contact us (see 'Contact us' below) for a copy of the retention schedule.

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.

We will dispose of your personal data securely when we no longer have a legal requirement to retain it.

7. Who we share data with

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

Where it is legally required, or necessary (and it complies with UK data protection law), we may share personal information about you with:

- Our local authorities, Oxfordshire and Bracknell Forest – to meet legal, regulatory, safeguarding or contractual requirements.
- Suppliers and service providers that support the operation of the trust, such as finance, IT, procurement, visitor management and contract management systems
- Financial organisations, including payment providers and banks
- Professional advisors and consultants including legal, audit and insurance providers
- Government departments, agencies and our regulators including Department for Education and Ofsted where required
- Police forces, courts and tribunals

7.1 Transferring data internationally

We do not routinely transfer supplier personal data outside the United Kingdom. Where a service provider processes personal data outside of the UK, we will ensure that appropriate safeguards are in place in accordance with UK data protection law.

8. Your rights

8.1 How to access personal information that we hold about you

You have a right to make a 'subject access request' to gain access to personal information that we hold about you.

If you make a subject access request, and if we do hold information about you, we will (subject to any exemptions that may apply):

- Give you a description of it
- Tell you why we are holding it, how we are processing it, and how long we will keep it for
- Explain where we got it from, if not from you
- Tell you who it has been, or will be, shared with
- Let you know whether any automated decision-making is being applied to the data, and any consequences of this
- Give you a copy of the information in an intelligible form

You may also have the right for your personal information to be transmitted electronically to another organisation in certain circumstances.

If you would like to make a request, please contact us (see 'Contact us' below).

8.2 Your other rights regarding your data

Under data protection law, you have certain rights regarding how your personal data is used and kept safe. For example, you have the right to:

- Object to our use of your personal data where it is likely to cause, or is causing damage or distress
- Prevent your data being used to send direct marketing
- Object to and challenge the use of your personal data for decisions being taken by automated means (by a computer or machine, rather than by a person)
- In certain circumstances, have inaccurate personal data corrected or blocked
- In certain circumstances, have the personal data we hold about you deleted or destroyed, or restrict its processing
- Withdraw your consent, where you previously provided it for the collection, processing and transfer of your personal data for a specific purpose
- In certain circumstances, be notified of a data breach
- Make a complaint to the Information Commissioner's Office if you feel we have not used your information the right way
- Claim compensation for damages caused by a breach of the data protection regulations

We may refuse your information rights request for legitimate reasons, which depend on why we're processing it. Some rights may not apply in these circumstances:

- Your right to have all personal data deleted or destroyed doesn't apply when the lawful basis for processing is legal obligation or public task

- Your right to receive a copy of your personal data, or have your personal data transmitted to another controller, does not apply when the lawful basis for processing is legal obligation, vital interests, public task or legitimate interests
- Right to object to use of your private data doesn't apply when the lawful basis for processing is contract, legal obligation or vital interests. And if the lawful basis is consent, you don't haven't the right to object, but you have the right to withdraw consent

See information on types of lawful basis in section 4 of this privacy notice.

To exercise any of these rights, please contact us (see 'Contact us' below).

9. Complaints

We are committed to upholding your data protection rights under the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018. If you think that our collection or use of personal information is unfair, misleading or inappropriate, or have any other concerns about our data processing, we encourage you to let us know.

In compliance with our statutory duties under the Data (Use and Access) Act 2025. We have established a formal process for handling data protection complaints.

You can submit a complaint in any of the following ways:

- Online: Complete and submit the online form
- Email: Send the details of your concern to dpl@propellertrust.org
- Post: Write to our Data Protection Lead, The Propeller Academy Trust, The Lambourn, Wyndyke Furlon, OX14 1UJ.
- Verbally: You can raise a verbal complaint with a member of our staff who will ensure that it is logged formally

We will acknowledge your complaint within 30 days of receipt and keep you updated on our investigation progress.

If you are not satisfied with our final response, you have the right to escalate your complaint to the Information Commissioners Officer. You can find out more information about this on the ICO's website https://ico.org.uk/make-a-complaint/.

10. Contact us

If you have any questions or concerns, or would like more information about anything mentioned in this privacy notice, please contact our **Data Protection Lead (DPL)** on dpl@propellertrust.org.