



General Privacy Notice

Notice about how we use your personal information

This privacy notice has been prepared in accordance with the General Data Protection Regulation (EU) 2016/679 (“GDPR”) and explains how Bolton College collects, uses and protects personal data that we hold.

This notice applies to all visitors to the College including those using commercial operations, including but not restricted to:

- Visitors attending events organised by the College
- Those using commercial services, including Signature restaurant, sport hall or gym, theatre or hair and beauty salons.

This Privacy Notice may be updated from time-to-time. The latest version is published on our website.

What is personal data?

Personal data is information relating to an identified or identifiable living person. Identification can be by the information alone or in conjunction with other information available. From the 25th May 2018 the processing of personal data is governed by the EU General Data Protection Regulation (the “GDPR”) 2016 and the UK Data Protection Bill 2018. Links to these documents are provided below:

<https://www.eugdpr.org/>

<https://services.parliament.uk/bills/2017-19/dataprotection.html>

What personal data do we collect and for what purposes?

Depending on your reason for your visit we may collect a range of information including, but not limited to the following:

- Name, date of birth
- Contact information including, phone, email and postal addresses
- Employment information such as employment status and employment history
- Diversity data (e.g. sex, age, ethnicity, disability)
- Medical and health information, including allergies
- Financial information i.e. bank/payment details
- Information relating to contact preferences for marketing or surveys
- CCTV images on College property

- Photos or video media related to you, your activities within College or for publication of marketing materials or identification purposes.

Collecting this data helps us provide you with a service which meets your needs and enables us to meet our statutory duties. Specifically, we may use data:

- to keep our staff, students, visitors, property and premises safe.
- to contact you regarding bookings and services
- to customise our services so they work better for our customers
- to inform you of other related events/opportunities at the College

At no time will we assume your permission to use information that you provide for anything other than the reasons stated here or to provide additional services which we would be reasonably be expected to do so. We will never sell your information on to any third parties

How do we process your personal data?

We comply with our obligations under the GDPR and the UK Data Protection Bill by keeping personal data up to date; by storing and destroying it securely; by not collecting or retaining excessive amounts of data; by protecting personal data from loss, misuse, unauthorised access and disclosure and by ensuring that appropriate technical measures are in place to protect personal data.

We use organisational and technical methods to safeguard your data. The Data Protection policy provides more information.

We aim to provide you with access to your personal information. If that information is wrong, we strive to give you ways to update it quickly or to delete it – unless we have to keep that information for legitimate business or legal purposes.

What is the legal basis for processing your personal data?

Except in the circumstances highlighted below, we process this information on the basis of our legitimate interests:

- we have a legitimate interest in wishing to interact with you to manage and operate effectively our College and to ensure that the College is safe and secure for all persons visiting; and
- to be able to do so, we need to understand details of who is in the building and to be able to communicate with them.
- where you have engaged with the commercial services provided by the College then we will send you related information on the basis of our legitimate business interests. In doing so, we will offer you an opportunity to refuse marketing when your details are collected and in subsequent messages (by way of own unsubscribe).
- where we are required by law to hold certain records, then we collect and hold those records to comply with that legal obligation.

How do we share your personal information?

We may share your personal information as follows:

- when the College receives a request from an appropriate body we may share your personal data for law enforcement purposes, ie for the purposes of the prevention, investigation, detection or prosecution of criminal offences or the execution of criminal penalties, including the safeguarding against and the prevention of threats to public security.
- Information may be shared with third parties if it is in connection with the service we are providing to you, for example with market research companies contracted to undertake work on our behalf to assess your satisfaction with our service. Information Sharing Agreements will be in place for such circumstances.

In all cases data shared will be reviewed to ensure only the minimum required is shared.

How long do we keep your personal data?

We will keep your personal data for as long as is necessary for the purpose for which we are processing it, unless we have a legitimate reason for keeping it, for example, any legal requirement to keep the data for a set time period.

Beyond that we may retain some information anonymised to ensure you cannot be identified in order to inform trend analysis and profiles. Where we do not need to continue to process your personal data, it will be securely destroyed.

Further details of this are provided in our Personal Data Retention Schedule

Monitoring your use of the College's Computers

We keep an eye on how you use the College's equipment and computers and what websites you go on when you are browsing the internet at College. This is because we have legal obligations to protect you, and we also have a legitimate interest in making sure you are using our computer equipment correctly and that you are not looking at any inappropriate content.

If you want to browse the internet privately, you will need to use your own devices which are not linked to the College's network or internet connection.

Your rights and your personal data

Unless subject to an exemption under the data processing regulations, you have the following rights with respect to your personal data:

- the right to make a complaint to the Information Commissioner's Office (ICO) if you are unhappy about the way your personal data is being used – please refer to the ICO's website for further information about this (<https://ico.org.uk/>);
- the right to ask us what personal information about you we are holding and to have access to a copy of your personal information;
- the right to ask us to correct any errors in your personal information;

- the right, in certain circumstances such as where our use of your personal information is based on your consent and we have no other legal basis to use your personal information, to ask us to delete your personal information;
- the right, in certain circumstances such as where we no longer need your personal information, to request that we restrict the use that we are making of your personal information;
- the right, where our use of your personal information is carried out for the purposes of an agreement with us and is carried out by automated means, to ask us to provide you with a copy of your personal information in a structured, commonly-used, machine-readable format.

You can access the personal information that we hold about you by submitting a Subject Access Request (SAR) to the College. This request must be in writing and clearly specify the information you require. A SAR form is available on the College website to assist you with submitting a request.

If you would like to make a request regarding the processing of your personal data please contact the Data Protection Officer via the details provided below. However, restrictions do apply depending on the lawful processing reason and statutory requirements. Therefore, it is not always possible for requests to delete information to be fulfilled and the Data Protection Officer can provide you with more information on request.

Further information can be found in our Data Protection Policy (pdf).

Updating your Personal Data

The College has an obligation to ensure that the data we keep is kept as accurate as possible. Please provide updated information directly to the department whose services you are using.

Copies of College policies

Copies of our related policies are available from our website.

Complaints

We try to meet the highest standards when collecting and using personal information. For this reason, we take any complaints we receive about this very seriously. We encourage people to bring it to our attention if they think that our collection or use of information is unfair, misleading or inappropriate.

Contact Us

If you have any concerns or questions please email the College's Data Protection Officer: **dpo@boltoncc.ac.uk**

Or write to:

Data Protection Officer
Bolton College

Deane Road
Bolton
BL3 5BG

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