Privacy Notice for Visitors (including Guest Wifi)

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Together, pursuing life in all its fullness

Version	Date	Author	Changes
V1	March 2024	School to TLC / Louise Beale	Initial Issue
V1.1	August 2026	Deb Bacon	Review and no changes

Review frequency	2 years
Review date	August 2028
Ratified by	Trust Leadership Team
Date of ratification	
Lead/owner	Head of Operation and Compliance
Target audience	Visitors to an academy
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The electronic version is the definitive version of this document.

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1.0 Introduction

This Privacy Notice for visitors and Guest WiFi users explains how and why we store personal information about those who visit a Trust academy and those who access our Guest WiFi. It provides a guide to our legal obligations and their own rights. Like any organisation which handles personal data, The Trust is the 'Data Controller' as such, we are registered with the ICO (Information Commissioner's Office) and we comply with UK General Data Protection Regulation (UK GDPR). Our ICO registration number is ZA000718.

2.0 Categories of Visitor and Guest WiFi User Information That We Process

We process the following personal information from Visitors and Guest WiFi Users:

Name
Email address
Vehicle registration number (if applicable)

3.0 Why We Collect and Use Visitor and Guest WiFi User Information

We use visitor and Guest WiFi data to:

- Ensure the safeguarding of young people and vulnerable adults
- Maintain high standards of health and safety

Under the UK General Data Protection Regulation (UK GDPR), the legal basis / bases we rely on for processing personal information for general purposes are:

(6b) Performance of a Contract: the processing is necessary for the performance of a contract to which the data subject is party.

(6c) A Legal obligation: the processing is necessary for us to comply with the law.

(6e) Public task: the processing is necessary for us to perform a task in the public interest or for our official functions, and the task or function has a clear basis in law.

The lawful bases for processing personal data are set out in Article 6 of the UK General Data Protection Regulation.

4.0 Storing Visitor and Guest WiFi User Information

We hold data securely for the set amount of time shown in our Data Retention Schedule. For more information on our Data Retention Schedule and how we keep your data safe, please see our Data Protection Policy and our IT and Information Security Policy available from our website here.

5.0 Who We Share Visitor and Guest WiFi User Information With

We do not share visitor information with third parties unless we are legally required to do so.

We share Guest WiFi User information with our guest WiFi and network provider in order to perform the service of providing the guest WiFi. We do not share Guest WiFi User information with any other third parties unless we are legally required to do so.

6.0 Requesting Access to Your Personal Data

Under data protection legislation, you have the right to request access to information about you that we hold. To make a request for your personal information, contact the academy office.

Depending on the lawful basis used for processing data (as identified above), you may also have the right to:

- have your personal data rectified if it is inaccurate or incomplete;
- request the deletion or removal of personal data where there is no compelling reason for its continued processing;
- restrict our processing of your personal data (i.e. permitting its storage but no further processing);
- object to direct marketing (including profiling) and processing for the purposes of scientific/historical research and statistics; or
- not be subject to decisions based purely on automated processing where it produces a legal or similarly significant effect on you.

If you have a concern about the way we are collecting or using your personal data, we ask that you raise your concern with us in the first instance. Alternatively, you can contact our Data Protection Officer, see the contact section below. You can also contact the Information Commissioner's Office at https://ico.org.uk/concerns/

7.0 Last Updated

We may need to update this privacy notice periodically so we recommend that you revisit this information from time to time.

8.0 Contact

If you would like to discuss anything in this privacy notice, please contact the school office in the first instance or the Data Protection Officer:

The Data Protection Officer
The Diocese of Coventry Multi Academy Trust
c/o St James CofE Academy
Barbridge Road, Bulkington
Bedworth, CV12 9PF
Tel: 01788 422900
dpo@covmat.org

Appendix 1 – Text for Visitors Books and Electronic Sign In Systems

This Privacy Notice for visitors explains how and why we store personal information about those who visit the school. It provides a guide to our legal obligations and their own rights. Like any organisation which handles personal data, our school is the 'Data Controller' as such, we are registered with the ICO (Information Commissioner's Office) and we comply with UK General Data Protection Regulation (UK GDPR). Our ICO registration number is ZA000718.

We collect the information requested in the sign-in book / App.

Our legal basis for collecting this information is under Article 6(e) of the UK GDPR – Public Task, and Article 6(c) of the UK GDPR – Legal Obligation.

The reason we collect this information is for the safeguarding of young people and health and safety.

This data is not shared with any third party unless legally required and is retained securely by the school in line with our Data Retention Schedule. Please see our Data Retention Schedule, Data Protection Policy and IT and Information Security Policy for further information. These are available on our website or on request from the school office.

Full information is available in our Privacy Notice for Visitors (including Guest WiFi Users) which is available on our website or on request from the school office.

Appendix 2 - Text for Guest WiFi User Sign-Up Page

This Privacy Notice for Guest WiFi Users explains how and why we store personal information about those who use the guest WiFi at our school. It provides a guide to our legal obligations and their own rights. Like any organisation which handles personal data, our school is the 'Data Controller' as such, we are registered with the ICO (Information Commissioner's Office) and we comply with UK General Data Protection Regulation (UK GDPR). Our ICO registration number is ZA000718

We collect the name and email address for Guest WiFi Users

Our legal basis for collecting this information is under Article 6(b) of the UK GDPR – Performance of a Contract.

The reason we collect this information is for the safeguarding of young people.

This data is shared with our guest WiFi and network provider in order to perform the service of providing the guest WiFi. It is not shared with any other third party unless legally required and is retained securely by the school in line with our Data Retention Schedule. Please see our Data Retention Schedule, Data Protection Policy and IT Information Security Policy for further information. These are available on our website or on request from the school office.

Full information is available in our Privacy Notice for Visitors (including Guest WiFi Users) which is available on our website or on request from the school office.