

## **Privacy Information for Members of the Public**

### **Which organisation is processing my personal data?**

Exeter College Further Education Corporation, Hele Road, Exeter, Ex4 4JS, 01392 400500

### **Who is the person responsible for data protection?**

The responsible person for data protection is the Data Protection Officer (DPO), whose details can be found at <https://exe-coll.ac.uk/dataprotection/>. The DPO Team can be contacted by emailing [DPO@exe-coll.ac.uk](mailto:DPO@exe-coll.ac.uk)

### **What does 'personal data' mean?**

Personal data is any information that identifies a data subject (a living person) directly or indirectly. Examples of personal data are name, address, identification number etc. Some information about a person is called 'special category data'. This includes race, ethnic origin, political opinions, religious beliefs, trade union membership, genetic and biometrical information, health, sex life and sexual orientation. This type of information receives additional protection.

### **What does 'learner' mean?**

A learner is a child, young person or adult who is cared for or enrolled at the college but is not enrolled on or applying for a university-level course.

### **What does 'student' mean?**

A student is a person who is applying for or enrolled on a university-level course.

### **What does 'processing' mean?**

'Processing data' means collecting, recording, filing, organising, storing, amending, retrieving, consulting, using, disclosing, sharing, and destroying information that identifies a living person.

## Does the college have the right to process my personal data?

Exeter College must only process personal data if it has a lawful basis to do so. If the college processes your information for different purposes, there may be different lawful bases. The lawful basis used will be explained whenever personal data is collected. These are the lawful bases that the college uses:

1. **Legal Obligation:** In certain circumstances the college may be legally required to share personal information with law enforcement and other agencies. The college will only share the information which it is obliged to by law. The college keeps this data safe until it is passed into the control of the relevant agency, at which point the safe keeping of the information becomes the responsibility of the third-party.
2. **Public Task:** The college is a public body which has the public task to deliver education. To deliver education the processing of personal data is required for a range of tasks:
  - advertising
  - enrolling
  - tutoring
  - safeguarding
  - teaching
  - assessing (including via publicly assessed qualifications)
  - recording
  - reporting
  - managing learners' educational progress, attainment and wellbeing
  - providing and managing learning resources and ICT services
  - maintaining a healthy, safe and secure college environment

In the process of delivering education, the college may provide financial support to eligible learners. To assess a learner's eligibility, the college needs evidence of their financial position and that of other members of their household. Therefore, the college will process data relating to learners' personal and financial circumstances for the purpose of assessing whether financial support may be given.

In carrying out its public task, the college may process special categories information including health information; to enable the assessment of a learner's need for social protection to ensure they can take full advantage and benefit from their education. The college will collect and process health and related information for the purposes of health assessment and advice. Where this happens, more privacy information will be offered at the point where this data is collected.

3. **Fulfilling a contract:** The college also fulfils a contract to deliver learning to learners. To do so the processing of personal data is required for:
  - advertising
  - enrolling
  - tutoring
  - safeguarding
  - teaching
  - assessing (including via publicly assessed qualifications)

- recording
- reporting
- managing learners' educational progress, attainment and wellbeing

The college also fulfils contracts to deliver services to customers of its

- @34 restaurant,
- h2b spa and beauty therapies,
- Central Fitness gym,
- Nursery,
- Haven Banks Outdoor Education Centre.

Personal information will be collected from people who use these services. Only necessary information will be processed to provide the chosen service. It will be used to ensure that the college is able to fulfil its obligations to each customer. Some of the processed information may be special categories data where fitness plans or certain therapies are concerned.

The college is obliged to safeguard the wellbeing of learners, students, customers, visitors and employees. It will therefore process personal data, including CCTV images, to record who is present on its premises and at what time.

4. **Consent:** If the college needs to process personal data belonging to members of the public who are not enrolled and with whom it does not have a contractual relationship, it will usually do so based on consent. Consent will ask for every time there is a new purpose for processing information, and it can be withdrawn at any time.

#### **What categories of personal information are received from third parties?**

The college collects and processes information from third parties about learners and applicants. This information may be about the person's

- academic history
- health and wellbeing
- safeguarding
- support plans
- domestic and financial circumstances
- interactions with other agencies including the police

The college may get such information from

- a present of previous school, college, university, or employer
- Youth Offending Team
- Probation Service
- Local Authorities from across the UK
- Careers Southwest (CSW)
- Health Professionals
- Student Loan Company
- UCAS
- parents, carers, and guardians

## **With which organisations and people does the college share personal information?**

The college will share information where there is a lawful basis to do so with

- Awarding Organisations
- Careers Southwest (CSW)
- Employers
- Health Professionals
- Local Authorities from across the UK
- Ofsted
- parents and guardians
- previous or subsequent schools, colleges, universities
- Probation Service
- Student Loans Company
- UCAS
- Youth Offending Team

Learners' personal information will be used by college employees and contractors who need it to ensure that each learner receives effective education and pastoral care. Personal information may be processed on behalf of the college by

- Awarding Organisations
- BKS B
- CPOMS
- DocuSign
- Dr Frost Math
- Enrola
- ESI-SimulationX
- Event500
- EZY Education
- Heritage ISOxford
- Hop-In
- IHasco
- ManageBac
- Microsoft
- Midas Systems
- Neyber
- OneFile
- SchoolCloud
- Turnitin
- Unit4
- WisePay
- Zoom

### **Does the college transfer personal information to other countries?**

The college will only transfer personal data to other countries, where it is safe to do so and in line with our Data Protection Policy and other relating documentation, which can be found at <https://exe-coll.ac.uk/dataprotection>

Data can be transferred safely where the UK is part of an Adequacy Decision, with Binding Corporate Rules or Standard Contractual Clauses.

### **For how long does the college keep personal information?**

The college keeps personal data for 7 years following the ending of its formal relationship with the individual. Within 1 year of the 7<sup>th</sup> anniversary, personal data will be anonymised, deleted, or securely destroyed.

The college has a Data Retention Schedule that lists all permissible exceptions to the 7-year limit, and it can be viewed here <https://exe-coll.ac.uk/dataprotection>.

### **What rights do data subjects have over their personal data?**

Everyone has the following rights:

- Right of access: the right to ask for a copy of the information held by the college.
- Right to rectification: the right to correct inaccurate or incomplete information held by the college.
- Right to erasure: in certain situations, individuals can ask for their data to be deleted from college records. Please note that certain data must be kept by the college because of other legal obligations. Where this is the case, the situation will be explained.
- Right to restrict processing: in certain circumstances individuals can ask the college to restrict the processing of their information.
- Right of portability: individuals have the right to have the personal data held by the college transferred to another organisation, where this is wanted.
- Right to object: individuals have the right to object to certain types of processing such as direct marketing.
- Right to object to automated processing: individuals have the right to object to automated decision-making and profiling. In fact, the college does not process data for these purposes.
- Right to withdraw consent: individuals have the right to withdraw their consent again, which they have given previously. The college will only seek consent, where no other lawful basis for the processing applies.

### **How should data subjects go about exercising their rights?**

To exercise these rights individuals or authorised representatives can contact the DPO via the college website, email, telephone, or letter.

<https://exe-coll.ac.uk/dataprotection>

[DPO@exe-coll.ac.uk](mailto:DPO@exe-coll.ac.uk)

01392 400500

Data Protection Officer, Exeter College, Hele Road, Exeter EX4 4JS

### **How should data subjects complain if they have concerns?**

Complaints may be raised using the college Compliments, Comments and Complaints Procedure which can be found here <https://exe-coll.ac.uk/dataprotection>

Complaints about the college may be raised with the Office of the Information Commissioner at <https://ico.org.uk/concerns/>

### **What are the responsibilities of the data subject?**

Exeter College collects and processes personal data necessary for the operation and promotion of the college and to ensure the best interest of the data subjects are served. Individuals must provide accurate and complete personal data to enable the college to fulfil its obligations. Failure to do so may invalidate any contract which the individual and the college have entered.

Where the college relies on an individual's consent to process personal data, accessible means will be made available by which such consent can be withdrawn at any time.