



# Privacy Notice

## Introduction

This document refers to personal data, which is defined as information concerning any living person (a natural person who hereafter will be called the Data Subject) that is not already in the public domain.

The General Data Protection Regulation (GDPR) seeks to protect and enhance the rights of data subjects. These rights cover the safeguarding of personal data, protection against the unlawful processing of personal data and the unrestricted movement of personal data within the EU. It should be noted that GDPR does not apply to information already in the public domain.

Cantraybridge College is pleased to provide the following Privacy Notice:

## Personal Data

Cantraybridge College uses the information collected from you to provide quotations for our services, make telephone contact in the normal course of business, email regarding fundraising activities and events and marketing information which Cantraybridge College believes may be of interest to you, your business/service. In making initial contact you consent to Cantraybridge College maintaining a dialogue with you until you either opt out (which you can do at any stage) or we decide to desist in promoting or offering our services. Cantraybridge College acts on behalf of its clients/students/employees and volunteers in the capacity of both data controller and data processor. When working as a data processor, Cantraybridge College will mainly be acting on the instruction of Local Authorities/Social Work/Parents/Guardians.

Some personal data may be collected about you from the forms and surveys you complete, from records of our correspondence and phone calls and details of your visits to our website, including but not limited to personally identifying information like Internet Protocol (IP) addresses. Cantraybridge College may from time to time use such information to identify its visitors. Cantraybridge College may also collect statistics about the behavior of visitors to its website.

Cantraybridge College's website uses cookies, which is a string of information that a website stores on a visitor's computer, and that the visitor's browser provides to the website each time the visitor returns. The website uses cookies to help Cantraybridge College identify and track visitors and their website access preferences. Cantraybridge College's website visitors who do not wish to have cookies placed on

their computers should set their browsers to refuse cookies before using Cantraybridge College's website.

Any information Cantraybridge College holds about you and/or your business encompasses all the details we hold about you and any transactions including any third-party information we have obtained about you from public sources and our own suppliers such as credit referencing agencies.

Cantraybridge College will only collect the information needed so that it can provide you with services, and we do not sell or broker your data, although coincidentally there may be times when your information could be contained in data that Cantraybridge College has purchased from a third-party list broker, on behalf of a client.

## Legal basis for processing any personal data

To meet Cantraybridge College's contractual obligations to:

1. the Social Work department to deliver service to clients/students.
2. the Person allocated Individual Service Funds
3. suppliers/employees/ volunteers, for processing of payroll, tax and legal obligations, fundraising activities and other events

## Legitimate interests pursued by Cantraybridge College

To promote and deliver the services of Cantraybridge College.

## Consent

Through agreeing to this privacy notice you are consenting to Cantraybridge College processing your personal data for the purposes outlined. You can withdraw consent at any time by emailing [admin@cantraybridge.co.uk](mailto:admin@cantraybridge.co.uk) or writing to us, see last section for full contact details.

## Disclosure

Cantraybridge College may on occasions pass your Personal Information to third parties exclusively to process work on its behalf. Cantraybridge College requires these parties to agree to process this information based on our instructions and requirements consistent with this Privacy Notice and GDPR.

Cantraybridge College does not broker or pass on information gained from your engagement without your consent. However, Cantraybridge College may disclose your personal information to meet legal obligations, regulations or valid governmental request. We may also enforce its Terms and Conditions, including investigating potential violations of its Terms and Conditions to detect, prevent or mitigate fraud or security or technical issues; or to protect against imminent harm to the rights, property or safety of Cantraybridge College, its clients/students and/or the wider community.

## Retention Policy

Cantraybridge College will process personal data during the duration of any service contract and will continue to store only the personal data needed for five years after the contract has expired to meet any

legal obligations. After five years any personal data not needed will be deleted. The retention policy is available for review on request.

## Data storage

Data is held in Scotland using one local server and on Office 365. Cantraybridge College does not store personal data outside the EEA.

## Your rights as a data subject

At any point whilst Cantraybridge College is in possession of or processing your personal data, all data subjects have the following rights:

- Right of access – you have the right to request a copy of the information that we hold about you.
- Right of rectification – you have a right to correct data that we hold about you that is inaccurate or incomplete.
- Right to be forgotten – in certain circumstances you can ask for the data we hold about you to be erased from our records.
- Right to restriction of processing – where certain conditions apply you have a right to restrict the processing.
- Right of portability – you have the right to have the data we hold about you transferred to another organisation.
- Right to object – you have the right to object to certain types of processing such as direct marketing.
- Right to object to automated processing, including profiling – you also have the right not to be subject to the legal effects of automated processing or profiling.

In the event that Cantraybridge College refuses your request under rights of access, we will provide you with a reason as to why, which you have the right to legally challenge.

By submitting a subject access request form, Cantraybridge College at your request can confirm what information it holds about you and how it is processed.

## You can request the following information:

- Identity and the contact details of the person or organisation (Cantraybridge College) that has determined how and why to process your data.
- Contact details of the data collector.
- The purpose of the processing as well as the legal basis for processing.
- If the processing is based on the legitimate interests of Cantraybridge College or a third party.
- The categories of personal data collected, stored and processed.
- Recipient(s) or categories of recipients that the data is/will be disclosed to.
- How long the data will be stored.
- Details of your rights to correct, erase, restrict or object to such processing.
- Information about your right to withdraw consent at any time.
- How to lodge a complaint with the supervisory authority (Data Protection Regulator).

- Whether the provision of personal data is a statutory or contractual requirement, or a requirement necessary to enter into a contract, as well as whether you are obliged to provide the personal data and the possible consequences of failing to provide such data.
- The source of personal data if it wasn't collected directly from you.
- Any details and information of automated decision making, such as profiling, and any meaningful information about the logic involved, as well as the significance and expected consequences of such processing.

## To access what personal data is held, identification will be required

Cantraybridge College will accept the following forms of ID when information on your personal data is requested: a copy of your national ID card, driving license, passport, birth certificate and a utility bill not older than three months. A minimum of one piece of photographic ID listed above and a supporting document is required. If Cantraybridge College is dissatisfied with the quality, further information may be sought before personal data can be released.

All subject access requests and requests for personal data to be erased should be made to [admin@cantraybridge.co.uk](mailto:admin@cantraybridge.co.uk) or by writing to us at the address further below.

## Complaints

In the event that you wish to make a complaint about how your personal data is being processed by Cantraybridge College, you have the right to complain to Cantraybridge College's CEO. If you do not get a response within 30 days you can complain to the Data Protection Regulator.

The details for each of these contacts are:

Ms Jenny Liddell  
CEO  
Cantraybridge College,  
3 Cantray Square  
Croy  
IV2 5PP