





ACE Schools Multi Academy Trust

# Fair Processing Notice Privacy Policy

Issue	Date	Author/Reviewer Job Role	Comments	Signed by DPO
1	May 2018	Sapphire Consulting	New policy in line with GDPR	
2	Feb 2019	Chris Humphries/Director for Performance	Updated and MAT formatted	

## Contents

1	High Level Fair Processing Notice (FPN)	1
2	Legal Guardian/Pupil FPN	2
3	Staff/Employee FPN	5
4	Candidate/Applicant FPN	11
5	Trustees/Governors/Members/ FPN	14
6	Website Users FPN	16
7	Accident Book FPN	18
8	Next Of Kin/Emergency Contact FPN	21
9	Referees FPN	23

## 1 High Level Fair Processing Notice (FPN)

- 1.1 ACE Schools MAT understands the importance of Personal Data and has the protection of your data as its core.
- 1.2 We respect your personal data and take its security very seriously.
- 1.3 We only hold what data we need for the purpose for which we obtained it.
- 1.4 We delete your data when it has reached the end of its retention period.
- 1.5 You have privacy rights.
- 1.6 We are happy to answer your questions.

Our contact details can be found at the end of this notice.

For more information about how we use your personal data, please read the notice that applies best to you:

- [I am a legal guardian of a Student or Student](#)
- [I am a member of Staff](#)
- [I am applying for a role at ACE Schools MAT](#)
- [I am a Trustee/Governor](#)
- [I am a Website User](#)

We are happy to answer your questions. Our contact details can be found at the end of this notice.

### Contact us

Unit 3, Ensign House  
Parkway Court  
Longbridge Road  
Marsh Mills  
Plymouth  
PL6 8LR

Phone: +44 (0) 1752 396100

Email: [ace@aceschools.net](mailto:ace@aceschools.net)

ACE Schools MAT is registered with the Information Commissioner's Office (A1234567)

## 2 Legal Guardian/Pupil FPN

2.1 ACE Schools MAT understands the importance of Personal Data and has the protection of your data as its core.

### 2.2 Our contact details

#### 2.2.1 Our address is

Unit 3, Ensign House  
Parkway Court  
Longbridge Road  
Marsh Mills  
Plymouth  
PL6 8LR

Phone: +44 (0) 1752 396100

Email: [ace@aceschools.net](mailto:ace@aceschools.net)

2.3 What personal data do we collect about you? How do we use that personal data?

2.3.1 For the purposes of Student identification, we will collect a name, DoB and address. In order to identify the parents of students we will collect name, address, phone number and email; we will also use this to contact you about your child.

2.3.2 We also collect data relating to the student's background, such as ethnicity, nationality or ethnic origin. In addition to this, we will collect health data about the student such as if there are any medical conditions that we need to be aware about, any allergy or dietary requirements or if the student needs to take specific medication.

2.3.3 We will also consider the needs of the student by collecting data relating to safeguarding, or if the student is entitled to free school meals or if they are a looked after child.

2.4 What is our legal basis for processing your personal data?

2.4.1 We collect most of the personal data on the student using the legal basis of public interest, because it is in the public interest to provide an education to children and young people.

2.4.2 We are also required to process data using legal obligation as the legal basis. We do this for statutory reporting requirements to the Department for Education, the local authority and where legally obliged to do so; the courts and the police. We will also process your personal data using legal obligation for the purposes of safeguarding. This could be the processing of health data for the student's own protection and wellbeing, or the reporting of a potential domestic abuse case to a third party such as the police.

## 2.5 Do we use any automated decision making?

2.5.1 We do not use any automated decision making.

## 2.6 Who do we share your personal data with?

2.6.1 We share your personal data with the following recipients:

- Local Authority
- Department for Education
- School Staff
- External Health Providers
- External Education Resource Providers
- SENCO Specialists
- Our Software providers
- Cloud service providers

## 2.7 Do we transfer your personal data outside of the EU or EEA?

2.7.1 We do not transfer your personal data outside of the EU or EEA.

## 2.8 How long do we keep your personal data for?

2.8.1 We hold students personal data until they turn 25-years old, at which point it will be destroyed

## 2.9 Your rights

2.9.1 You have rights in respect of our processing of your personal data which are:

- 2.9.1.1 To access to your personal data and information about our processing of it. You also have the right to request a copy of your personal data (but we will need to remove information about other people).
- 2.9.1.2 To rectify incorrect personal data that we are processing.
- 2.9.1.3 To request that we erase your personal data if:
  - 2.9.1.3.1 we no longer need it;
  - 2.9.1.3.2 if we are processing your personal data by consent and you withdraw that consent;
  - 2.9.1.3.3 if we no longer have a legitimate ground to process your personal data; or
  - 2.9.1.3.4 we are processing your personal data unlawfully.
- 2.9.1.4 To object to our processing if it is by legitimate interest.
- 2.9.1.5 To restrict our processing if it was by legitimate interest.
- 2.9.1.6 To request that your personal data be transferred from us to another company if we were processing your data under a contract or with your consent and the processing is carried out automated means.

2.9.2 If you want to exercise any of these rights, please contact us.

2.9.3 If you have any questions or concerns, please contact us as most matters can be resolved informally in the first instance. You also have the right to lodge a complaint about our processing the UK's Information Commissioner's Office.

### 3 Staff/Employee FPN

3.1 At ACE Schools MAT, we respect your personal data. This Fair Processing Notice explains how we will use your personal data when you work for us.

#### 3.2 Our contact details

3.2.1 Our address is

Unit 3, Ensign House  
Parkway Court  
Longbridge Road  
Marsh Mills  
Plymouth  
PL6 8LR

Phone: +44 (0) 1752 396100

Email: [ace@aceschools.net](mailto:ace@aceschools.net)

#### 3.3 What personal data do we collect about you? How will we use that personal data?

3.3.1 When you are employed by us, we will collect and process a wide variety of your personal data. We start by collecting the personal data on your CV and the information that we gathered from you during the recruitment process (name, phone, email and work history). This personal data forms the start of your HR file.

3.3.2 In order for you to be employed by us, we process your name, home address, gender, NI number, date of birth, employment start date, DBS number and your signature. We will need your P45 form/ P60 or P11d, if you have one. We will also need to see your identification (passport, UK birth certificate or adoption certificate, EU (or Swiss) passport, Biometric Residence Permit, Certificate of Registration or Naturalisation, Right of Abode Certificate) as proof of your right to work in the UK.

3.3.3 In order to pay you, we will need your NI number and your bank account details. We may also receive court orders that require us to make deductions from your pay (eg non-payment of council tax or child maintenance.)

- 3.3.4 During your time with us, we will collect information about your health, such as when you are ill or have had an accident. We need to process this personal data in order to fulfil our legal obligations to you as your employer or as a requirement of your employment contract.
- 3.3.5 We will also collect your personal data in regard to you having a DBS check. This comprises of your name, signature, address, NI Number, DoB, ID number, photo/biometric photo and nationality.
- 3.3.6 If you become pregnant, we will process your health data in order to assure ourselves, and you, that the workplace is safe for you. You also have rights in the workplace when you are pregnant, and we will process your health data and proof of your baby's birth in order to fulfil your rights for maternity leave.
- 3.3.7 If you wish to take paternity leave, we will process your personal data (your name and your request) in order to fulfil your legal right to do so.
- 3.3.8 You have the right to request flexible working and we will process your personal data (your name and your request) during this process.
- 3.3.9 There may come a time that we will be required to process your personal data during a disciplinary or grievance process. This information will likely be your name and statements from other people about you. If you leave us, we will collect personal data from your resignation letter.
- 3.3.10 We provide pensions for our staff and need to process your name, date of birth, NI number and your salary information in order to do this.
- 3.3.11 Your image in a photo or video is your personal data and we will only use it for marketing purposes with your consent. You don't have to consent – it is completely your choice.
- 3.3.12 If you are a driver, we will process your driving license to check your suitability to drive company vehicles. This is a contractual obligation and if you cannot provide your driving license, you will be unable to drive company vehicles.
- 3.3.13 We monitor email traffic, but not the content of emails but, in doing so, we may process your personal data, such as your



personal corporate email address, your IP address and the MAC address.

3.3.14 During the course of your employment, you will be required to put your name on or sign a wide variety of documents. Your name or signature is your personal data but the contents of the document, unless it is about you, is not your personal data.

#### 3.4 Data on your next of kin or emergency contact

3.4.1 For your next of kin or emergency contact, we will process the following personal data: name, phone and address.

#### 3.5 What is our legal basis for processing your personal data? How long do we hold your personal data?

3.5.1 We need a legal basis in order to process your personal data. Most of our processing is because we either have a legal obligation to process the data or because we have a contract of employment with you. On occasion, we will seek your consent to process your personal data, but you are free to refuse.

#### 3.6 We will process the following personal data because we have a legal obligation to do so:

3.6.1 Your identification documents to ensure that you have the right to work in the UK.

3.6.2 Your name, home address, gender, NI number, date of birth and signature are processed because we are required to do so by HMRC.

3.6.3 We may receive a court order that require us to make deductions from your pay (eg non-payment of council tax or child maintenance).

3.6.4 We will process your health data if you are ill or have an accident because we have a legal obligation to do so.

3.6.5 If you become pregnant, we will process your health data because we have a legal obligation to fulfil your rights for maternity leave.

- 3.6.6 If you wish to take paternity leave, we will process your personal data because we have a legal obligation to fulfil your rights for paternity leave.
  - 3.6.7 If you wish to request flexible working and we will process your personal data because we have a legal obligation to fulfil your right to request flexible working.
  - 3.6.8 If you are involved in a disciplinary or grievance process, we will process your personal data because we have a legal obligation to provide a disciplinary or a grievance process.
  - 3.6.9 We have a legal obligation provide pensions for our staff and we need to process your name, date of birth, NI number and your salary information in order to do this.
  - 3.6.10 We have a legal obligation under safeguarding that all staff have a current DBS in place and we need to process your name, signature, address, NI Number, DoB, ID number, photo/biometric photo and your nationality.
- 3.7 We will process the following personal data because we have a contract of employment with you:
- 3.7.1 Your CV and the information that we gathered from you during the recruitment process.
  - 3.7.2 We will need your NI number and your bank account details in order to pay you.
  - 3.7.3 If you are a driver, we need to process your driving license as this is a contractual obligation.
- 3.8 We will process the following personal data because you have consented for us to do so:
- 3.8.1 We will only use your photo for marketing purposes you're your consent.
  - 3.8.2 We will collect personal data from your resignation letter, if you choose to write one.

3.9 We will process the following personal data because we believe that we have a legitimate interest in doing so:

3.9.1 We monitor email traffic, but not the content of emails but, in doing so, we may process your personal data. This processing is necessary for the security of our email system and to prevent misuse.

3.9.2 During the course of your employment, you will be required to put your name on or sign a wide variety of documents. This use of your personal data is necessary for the running of our business.

3.9.3 We will process your personal data during our appraisal process as we have a legitimate business interest in appraising our staff and helping you to achieve your best for the business.

3.9.4 We will process your image in CCTV footage. We have a legitimate interest in preventing crime and in the safety and security of our staff, customers, visitors and our sites.

3.9.5 For your next of kin or emergency contact, we will process the following personal data: name, phone and address. We have a legitimate interest in processing this data in order to provide you with an emergency contact.

3.9.6 You have the right to object to our processing your data using legitimate interest. Please speak to us if you have any concerns.

3.10 Do we use any automated decision making?

3.10.1 We do not use any automated decision making.

3.11 Who do we share your personal data with?

3.11.1 We share your personal data with the following recipients:

- HMRC
- Payroll and HR Services
- Our software providers
- Cloud service providers
- Potentially ACAS and an Employment Tribunal

- Pension providers
- Benefits providers
- Banks or building societies
- Government agencies
- Financial references
- Employment references

### 3.12 Do we transfer your personal data outside of the EU or EEA?

3.12.1 We do not transfer your personal data outside of the EU or EEA.

### 3.13 How long do we keep your personal data for?

3.13.1 We hold your personal data while you are employed by us and for seven years after due to HMRC requirements. After seven years, your file will be destroyed.

### 3.14 Your rights

3.14.1 You have rights in respect of our processing of your personal data which are:

3.14.1.1 To access to your personal data and information about our processing of it. You also have the right to request a copy of your personal data (but we will need to remove information about other people).

3.14.1.2 To rectify incorrect personal data that we are processing.

3.14.1.3 To request that we erase your personal data if:

- a) We no longer need it;
- b) If we are processing your personal data by consent and you withdraw that consent;
- c) If we no longer have a legitimate ground to process your personal data; or

d) We are processing your personal data unlawfully.

- 3.14.4 To object to our processing if it is by legitimate interest.
- 3.14.5 To restrict our processing if it was by legitimate interest.
- 3.14.6 To request that your personal data be transferred from us to another company if we were processing your data under a contract or with your consent and the processing is carried out automated means.
- 3.14.7 If you want to exercise any of these rights, please contact us.
- 3.14.8 If you have any questions or concerns, please contact us as most matters can be resolved informally in the first instance. You also have the right to lodge a complaint about our processing the UK's Information Commissioner's Office.

## 4 Candidate/Applicant FPN

4.1 At ACE Schools MAT, we respect your personal data. This Fair Processing Notice explains how we will use your personal data when you apply to work for us.

### 4.2 Our contact details

4.2.1 Our address is

Unit 3, Ensign House  
Parkway Court  
Longbridge Road  
Marsh Mills  
Plymouth  
PL6 8LR

Phone: +44 (0) 1752 396100

Email: [ace@aceschools.net](mailto:ace@aceschools.net)

#### 4.3 What personal data do we collect about you? How will we use that personal data? What is the legal basis? What is the retention period?

4.3.1 We use your name, address, contact details and work history to assess your application. We are processing your personal data on the basis of your consent. If you submit your CV to us, that is a clear affirmative action that indicates to us that you have consented to us processing your personal data.

4.3.2 We will collect and process personal data during the recruitment process, such as interview notes. Our legal basis for doing so is legitimate interest – taking and processing notes and other details during the recruitment process is a legitimate activity for a business.

#### 4.4 How long do we keep your personal data for?

4.4.1 If you are not successful at any point during the recruitment process, we will hold your personal data for six months in case of any employment tribunal claims as we have a legitimate interest in doing so.

4.4.2 We will only hold your CV for six months in case of any future job with your consent. After six months, it will be deleted.

#### 4.5 Who do we share your personal data with?

4.5.1 We share your personal data with the following recipients:

- Our software providers
- Cloud service providers
- Referees

#### 4.6 Do we transfer your personal data outside of the EU or EEA?

4.6.1 We do not transfer your personal data outside of the EU or EEA.

#### 4.7 Do we use any automated decision making?

4.7.1 We do not use any automated decision making.

#### 4.8 Your rights

4.8.1 You have rights in respect of our processing of your personal data which are:

- 4.8.1.1 To access to your personal data and information about our processing of it. You also have the right to request a copy of your personal data (but we will need to remove information about other people).
- 4.8.1.2 To rectify incorrect personal data that we are processing.
- 4.8.1.3 To request that we erase your personal data if:
  - 4.8.1.4 We no longer need it;
  - 4.8.1.5 If we are processing your personal data by consent and you withdraw that consent;
  - 4.8.1.6 If we no longer have a legitimate ground to process your personal data; or
  - 4.8.1.7 We are processing your personal data unlawfully.
- 4.8.2 To object to our processing if it is by legitimate interest.
- 4.8.3 To restrict our processing if it was by legitimate interest.
- 4.8.4 To request that your personal data be transferred from us to another company if we were processing your data under a contract or with your consent and the processing is carried out automated means.
- 4.8.5 If you want to exercise any of these rights, please contact us.
- 4.8.6 If you have any questions or concerns, please contact us as most matters can be resolved informally in the first instance.
- 4.8.7 If you have any questions or concerns, please contact us as most matters can be resolved informally in the first instance. You also have the right to lodge a complaint about our processing the UK's Information Commissioner's Office.

## 5 Trustees/Governors/Members/FPN

5.1 ACE Schools MAT collect data about our Trustees, Members and Governors to meet our legal and contractual obligations. This Fair Processing Notice explains what data we process, why we process it, our legal basis, how long we keep it and the rights of directors.

5.2 We will always make sure that any personal data is protected and treated securely.

### 5.3 Our contact details

5.3.1 Our address is

Unit 3, Ensign House  
Parkway Court  
Longbridge Road  
Marsh Mills  
Plymouth  
PL6 8LR

Phone: +44 (0) 1752 396100

Email: [ace@aceschools.net](mailto:ace@aceschools.net)

### 5.4 What data do we process and why do we need it?

5.4.1 We are required by law to hold personal data about trustees, members and governors as follows:

5.4.2 Your name, address, DoB, phone numbers, email address, NI Number gender and your DBS number.

### 5.5 We will process the following personal data because it is a legitimate activity

5.5.1 During the course of your term, you will be required to put your name on or sign a wide variety of documents.

5.5.2 To hold records in software and in the cloud.

### 5.6 How long do we hold the personal data of directors?

5.6.1 We hold your personal data for seven-years after the end of your term as a governor or trustee.



## 5.7 Who do we share your information with?

5.7.1 We share your information with the following, when required:

- Our legal advisors;
- Our insurance providers;
- Our software and cloud service providers;
- HMRC;
- Banks or building societies;
- Pension providers;
- Local Authority;
- Department for Education;
- DBS.

## 5.8 Data transfers out of the EU or EEA

5.8.1 We do not transfer any personal data out of the EU or EEA.

## 5.9 Your rights

5.9.1 You have rights in respect of our processing of your personal data which are:

- 5.9.1.1 To access to your personal data and information about our processing of it. You also have the right to request a copy of your personal data (but we will need to remove information about other people).
- 5.9.1.2 To rectify incorrect personal data that we are processing.
- 5.9.1.3 To request that we erase your personal data if:
  - 5.9.1.3.1 We no longer need it;
  - 5.9.1.3.2 If we are processing your personal data by consent and you withdraw that consent;

- 5.9.1.3.3 If we no longer have a legitimate ground to process your personal data; or
  - 5.9.1.3.4 We are processing your personal data unlawfully.
  - 5.9.1.4 To object to our processing if it is by legitimate interest.
  - 5.9.1.5 To restrict our processing if it was by legitimate interest.
  - 5.9.1.6 To request that your personal data be transferred from us to another company if we were processing your data under a contract or with your consent and the processing is carried out automated means.
- 5.9.2 If you want to exercise any of these rights, please contact us.
- 5.9.3 If you have a concern about the way we are collecting or using your personal data, please raise your concern with us in the first instance. You may also contact the Information Commissioner's Office at <https://ico.org.uk/concerns/>

## 6 Website users FPN

6.1 At ACE Schools MAT, we respect your personal data. This Fair Processing Notice explains how we will use your personal data when you use our website.

### 6.2 Our contact details

6.2.1 Our address is  
Unit 3, Ensign House  
Parkway Court  
Longbridge Road  
Marsh Mills  
Plymouth  
PL6 8LR

Phone: +44 (0) 1752 396100

Email: [ace@aceschools.net](mailto:ace@aceschools.net)

6.3 What personal data do we collect about you; how do we use that personal data; what is our legal basis and how long do we hold your data?

6.3.1 When you use our website, we will collect the following personal data about you:

- IP Address/ MAC address when you use the website

6.3.2 We need your IP address and MAC address for security reasons. This is a legitimate activity for a business. We use GoDaddy to host our websites in European data centres and they hold this data for the 1000 most recent visitors to the site.

6.4 Who do we share your personal data with?

6.4.1 We share your personal data with the following recipients:

- Our software providers
- Cloud service providers
- Website host

6.5 Do we use any automated decision making?

6.5.1 We do not use any automated decision making.

6.6 Do we transfer your personal data outside of the EU or EEA?

6.6.1 We do not transfer your personal data outside of the EU or EEA.

6.7 Your rights

6.7.1 You have rights in respect of our processing of your personal data which are:

- 6.7.1.1 To access to your personal data and information about our processing of it. You also have the right to request a copy of your personal data (but we will need to remove information about other people).
- 6.7.1.2 To rectify incorrect personal data that we are processing.
- 6.7.1.3 To request that we erase your personal data if:

- 6.7.1.3.1 We no longer need it;
  - 6.7.1.3.2 If we are processing your personal data by consent and you withdraw that consent;
  - 6.7.1.3.3 If we no longer have a legitimate ground to process your personal data; or
  - 6.7.1.3.4 We are processing your personal data unlawfully.
- 6.7.1.4 To object to our processing if it is by legitimate interest.
- 6.7.1.5 To restrict our processing if it was by legitimate interest.
- 6.7.1.6 To request that your personal data be transferred from us to another company if we were processing your data under a contract or with your consent and the processing is carried out automated means.

6.7.2 If you want to exercise any of these rights, please contact us.

6.7.3 If you have any questions or concerns, please contact us as most matters can be resolved informally in the first instance. You also have the right to lodge a complaint about our processing the UK's Information Commissioner's Office.

## 7 Accident Book FPN



Notice explains how we will use your personal data when we enter your details into the Accident Book.

## 7.2 Our contact details

### 7.2.1 Our address is

Unit 3, Ensign House  
Parkway Court  
Longbridge Road  
Marsh Mills  
Plymouth  
PL6 8LR

Phone: +44 (0) 1752 396100

Email: [ace@aceschools.net](mailto:ace@aceschools.net)

## 7.3 What personal data do we collect about you? How will we use that personal data?

7.3.1 We will collect your name, contact details and details about the accident.

## 7.4 What is our legal basis for processing your personal data? How long do we hold your personal data?

7.4.1 We need a legal basis in order to process your personal data.

7.4.2 We have a legal obligation to record accidents on our premises

## 7.5 Do we use any automated decision making?

7.5.1 We do not use any automated decision making.

## 7.5 Who do we share your personal data with?

7.6.1 We may need to inform medical professionals.

7.6.2 In some cases, we may need to inform the Health and Safety Executive.

## 7.6 Do we transfer your personal data outside of the EU or EEA?

7.6.1 We do not transfer your personal data outside of the EU or EEA.

## 7.7 How long do we keep your personal data for?

7.7.1 Personal details are kept for 3 years in the Accident book then destroyed securely.

## 7.8 Your rights

- 7.8.1 You have rights in respect of our processing of your personal data which are:
  - 7.8.1.1 To access to your personal data and information about our processing of it.
  - 7.8.1.2 You also have the right to request a copy of your personal data (but we will need to remove information about other people).
  - 7.8.1.3 To rectify incorrect personal data that we are processing.
  - 7.8.1.4 To request that we erase your personal data if:
    - 7.8.1.4.1 We no longer need it;
    - 7.8.1.4.2 If we are processing your personal data by consent and you withdraw that consent;
    - 7.8.1.4.3 If we no longer have a legitimate ground to process your personal data; or
    - 7.8.1.4.4 We are processing your personal data unlawfully.
- 7.8.2 To object to our processing if it is by legitimate interest.
- 7.8.3 To restrict our processing if it was by legitimate interest.
- 7.8.4 To request that your personal data be transferred from us to another company if we were processing your data under a contract or with your consent and the processing is carried out automated means.
- 7.8.5 If you want to exercise any of these rights, please contact us.
- 7.8.6 If you have any questions or concerns, please contact us as most matters can be resolved informally in the first instance. You also have the right to lodge a complaint about our processing the UK's Information Commissioner's Office.

## 78 Next of kin/Emergency contact FPN

<<This should be given to the employee to give to the next of kin/emergency contact>>

8.1 At ACE Schools MAT, we respect your personal data. This Fair Processing Notice explains how we will use your personal data when you are named as Next of Kin or an Emergency Contact

### 8.2 Our contact details

#### 8.2.1 Our address is

Unit 3, Ensign House  
Parkway Court  
Longbridge Road  
Marsh Mills  
Plymouth  
PL6 8LR

Phone: +44 (0) 1752 396100

Email: [ace@aceschools.net](mailto:ace@aceschools.net)

### 8.3 What personal data do we collect about you? How will we use that personal data?

8.3.1 We process your name and address so that we can hold your information on file in case of an emergency.

### 8.4 What is our legal basis for processing your personal data? How long do we hold your personal data?

8.4.1 We need a legal basis in order to process your personal data.

8.4.1.1 Holding your personal data as an emergency contact is a legitimate interest for us as an organisation so that we can contact you if we needed to.

8.4.1.2 We will hold this data for as long as the member of staff who named you as the emergency contact or next of kin works for us. We will destroy this data when they leave our employment.

## 8.5 Do we use any automated decision making?

8.5.1 We do not use any automated decision making.

## 8.6 Who do we share your personal data with?

8.6.1 We share your personal data with the following recipients:

- Companies that provide services to us.
- Cloud service & IT providers.

## 8.7 Do we transfer your personal data outside of the EU or EEA?

8.7.1 We do not transfer your personal data outside of the EU or EEA.

## 8.8 How long do we keep your personal data for?

8.8.1 We will retain your personal data during the length of employment of you or your next of kin in their HR records.

## 8.9 Your rights

8.9.1 You have rights in respect of our processing of your personal data which are:

- 8.9.1.1 To access to your personal data and information about our processing of it. You also have the right to request a copy of your personal data (but we will need to remove information about other people).
- 8.9.1.2 To rectify incorrect personal data that we are processing.
- 8.9.1.3 To request that we erase your personal data if:
  - 8.9.1.3.1 We no longer need it;
  - 8.9.1.3.2 If we are processing your personal data by consent and you withdraw that consent;
  - 8.9.1.3.3 If we no longer have a legitimate ground to process your personal data; or
  - 8.9.1.3.4 We are processing your personal data unlawfully.



- 8.9.1.4 To object to our processing if it is by legitimate interest.
  - 8.9.1.5 To restrict our processing if it was by legitimate interest.
  - 8.9.1.6 To request that your personal data be transferred from us to another company if we were processing your data under a contract or with your consent and the processing is carried out automated means.
- 8.9.2 If you want to exercise any of these rights, please contact us.
- 8.9.3 If you have any questions or concerns, please contact us as most matters can be resolved informally in the first instance. You also have the right to lodge a complaint about our processing the UK's Information Commissioner's Office.

## 89 Referees FPN

<<This should be given/sent to the referee at the time of making the reference request>>

- 9.1 At ACE Schools MAT, we respect your personal data. This Fair Processing Notice explains how we will use your personal data when you are named as a Referee for a candidate for a vacancy at Orbiss Ltd.
- 9.2 Our contact details
  - 9.2.1 Our address is  
  
Unit 3, Ensign House  
Parkway Court  
Longbridge Road  
Marsh Mills  
Plymouth  
PL6 8LR  
  
Phone: +44 (0) 1752 396100  
  
Email: [ace@aceschools.net](mailto:ace@aceschools.net)

9.3 What personal data do we collect about you? How will we use that personal data?

9.3.1 We process your name and address so that we can assess the suitability of the candidate who is applying for a job.

9.4 What is our legal basis for processing your personal data? How long do we hold your personal data?

9.4.1 We need a legal basis in order to process your personal data.

9.4.2 We process your personal data because it is in our legitimate interest to obtain references for potential employees.

9.5 Do we use any automated decision making?

9.5.1 We do not use any automated decision making.

9.6 Who do we share your personal data with?

9.6.1 We share your personal data with the following recipients:

- Companies that provide services to us
- Cloud service & IT providers

9.7 Do we transfer your personal data outside of the EU or EEA?

9.7.1 We do not transfer your personal data outside of the EU or EEA.

9.8 How long do we keep your personal data for?

9.8.1 We keep your personal data securely in the HR file of the successful candidate for the length of employment.

9.9 Your rights

9.9.1 You have rights in respect of our processing of your personal data which are:

- 9.9.1.1 To access to your personal data and information about our processing of it. You also have the right to request a copy of your personal data (but we will need to remove information about other people).
- 9.9.1.2 To rectify incorrect personal data that we are processing.

- 9.9.1.3 To request that we erase your personal data if:
  - 9.9.1.3.1 We no longer need it;
  - 9.9.1.3.2 If we are processing your personal data by consent and you withdraw that consent;
  - 9.9.1.3.3 If we no longer have a legitimate ground to process your personal data; or
  - 9.9.1.3.4 We are processing your personal data unlawfully.
- 9.9.1.4 To object to our processing if it is by legitimate interest.
- 9.9.1.5 To restrict our processing if it was by legitimate interest.
- 9.9.1.6 To request that your personal data be transferred from us to another company if we were processing your data under a contract or with your consent and the processing is carried out automated means.
- 9.9.2 If you want to exercise any of these rights, please contact us.
- 9.9.3 If you have any questions or concerns, please contact us as most matters can be resolved informally in the first instance. You also have the right to lodge a complaint about our processing the UK's Information Commissioner's Office.