

DATA PROTECTION PRIVACY NOTICE 2018 SOLE TRADERS/BUSINESSES

Invictus Education Trust respects your rights to confidentiality and privacy and is committed to compliance with the General Data Protection Regulation. This notice explains what personal data (information) we hold, how we collect it, how we use it and how we may share information with others.

Who are we?

Invictus Education Trust, uses and is responsible for certain personal information about you. When we do so we are regulated under the General Data Protection Regulation which applies across the European Union (including in the United Kingdom) and we are responsible as ‘controller’ of that personal information for the purposes of those laws.

Our Data Protection Officer is Mrs Julie Duern who can be contacted at the following:

Mrs Julie Duern
Data Protection Officer
Invictus Education Trust
Ward House
Himley Park
Himley Road
Dudley
DY3 4DF
Email: jduern@invictus.education

In some cases, your data will be outsourced to a third-party processor; however, this will only be done with your consent, unless the Trust have another legal basis to share your data. Where the Trust outsources data to a third-party processor, the same data protection standards that Invictus Education Trust upholds are imposed on the processor.

The personal data that we collect from you is:

- Name
- Business Address
- Business Email
- Business Telephone Number
- VAT Registration Number (*if applicable*)
- Bank Details
- Business references/testimonials (*sometimes acquired*)
- Enhanced DBS evidence (*if applicable.*)

How We Use Your Personal Data

Invictus Education Trust takes your privacy very seriously and will never disclose, share your data without your consent, unless required to do so by law. We only retain your data for as long as is necessary and for the purposes specified in this notice. The purposes and reasons for processing your personal data are detailed below:

- We collect your personal data in the performance of a business contract/service provision/procurement of goods, to fulfil our contractual and legal obligations.
- To meet legal or statutory requirements such as Financial Returns to Government, HMRC and external Audit
- For the purpose of business management and planning, and statistical analysis

This Privacy Notice applies in addition to the Trust's other relevant terms, conditions and policies including:

- The Trust's Data Protection Policy
- The Trust's Subject Access Policy
- The Trust's Data Retention Policy
- The Trust's Health & Safety Policy
- The Trust's Financial Management Policy

Safeguarding Measures

Invictus Education Trust takes your privacy seriously and we take every reasonable measure and precaution to protect and secure your personal data. We work hard to protect you and your information from unauthorised access, alteration, disclosure or destruction and have several layers of security measures in place, including:

- IT Systems access restrictions
- IT, authentications username ID and Password

Sharing and Disclosing Your Personal Information

We do not share or disclosure any of your personal information without your consent, other than for the purposes specified in this notice, or where, there is a legal requirement. Invictus Education Trust uses third parties to provide the below services and business functions. However, all processors acting on our behalf only process your data in accordance with instructions from us and comply fully with this privacy notice, the Data Protection Law and any other appropriate confidentiality and security measures.

- We collect and store your personal data as part of our legal obligation for business accounting and tax purposes
- We have a legal obligation to share your personal data with Crowe Clark Whitehill who are the external Auditors for Invictus Education Trust
- We have a legal obligation to share your personal data with the Disclosure & Barring Service in order to process DBS checks.
- We may share your personal data with West Midlands Insurance Services/Zurich Underwriters who provide the insurance cover/policies for Invictus Education Trust.
- We may share your personal information with other external services such as Inland Revenue and Departments of Government etc.

How Long We Keep Your Data

Invictus Education Trust will retain personal data securely and only in line with how long it is necessary to keep for legitimate and lawful reason. We have strict review and retention policies in place to meet these obligations. We are required under UK tax law to keep your employment personal data for a minimum of 6 years, after which time it will be destroyed.

Your rights

You have the right to access any personal information that Invictus Education Trust processes about you and to request information about:

- What personal data we hold about you
- The purposes of the processing
- The categories of personal data concerned

- The recipients to whom the personal data has/will be disclosed
- How long we intend to store your personal data for
- If we did not collect the data directly from you, information about the source

If you believe that we hold any incomplete or inaccurate data about you, you have the right to ask us to correct and/or complete the information and we will strive to update/correct it as quickly as possible; unless there is a valid reason for not doing so, at which point you will be notified.

You also have the right to request erasure of your personal data or to restrict processing in accordance with Data Protection Law, as well as to object to any direct marketing from us and to be informed about any automated decision-making that we use.

Any individual wishing to access or amend their personal data, or wishing their data to be transferred to another organisation will need to complete a Subject Access Request further details can be found in the Trust's Subject Access Request Policy

If we receive a request from you to exercise any of the above rights, we may ask you to verify your identity before acting on the relevant request, this is to ensure that your data is protected and kept secure.

Lodging a Complaint

Invictus Education Trust only processes your personal information in compliance with this privacy notice and in accordance with the relevant data protection laws. If, however you wish to raise a complaint regarding the processing of your personal data or are unsatisfied with how we have handled your information, you have the right to lodge a complaint, in the first instance with the designated school Data Protection Compliance Officer (see page 4) and/or with the Board of Trustees. You may also lodge a complaint with the Supervisory Authority - Information Commissioner's Office

Mr R Dimmock – Board of Trustees
Invictus Education Trust
Ward House
Himley Park
Himley Road
Dudley
DY3 4DF

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF
Telephone: 0303 123 1113 (local rate) or 01625 545 745 (national rate)
Fax: 01625 524 510
Email: enquiries@ico.org.uk

Data Protection Officers and Contact Details

School / Location	Officer Name	Email Address	School Address
Invictus Education Trust Headquarters	Julie Duern Designated Data Protection Officer	jduern@ellowes.dudley.sch.uk Tel: 01384 686 510	Ward House Himley Park Himley Road Dudley DY3 4DF
Crestwood High School	Kelly Chapman DP Compliance Officer	kchapman@crestwood-s.dudley.sch.uk Tel: 01384 686 846	Bromley Lane Kingswinford Dudley DY6 8QG
Ellowes Hall Sports College	Anthea Southall DP Compliance Officer	asouthall@ellowes.dudley.sch.uk Tel: 01384 686 533	Stickley Lane Lower Gornal Dudley DY3 2JH
Kinver High School	Kelly Jewkes DP Compliance Officer	kjewkes@kinverhigh.co.uk Tel: 01384 686 815	Enville Road Kinver South Staffs DY7 6AA
Leasowes High School	Harvey Smith DP Compliance Officer	hsmith@leasowes.dudley.sch.uk Tel: 01384 814167	Kent Road Halesowen Birmingham B62 8PJ
Ounsdale High School	Debbie McDonald DP Compliance Officer	dmcDonald@ounsdale.staffs.sch.uk Tel: 01902 504 931	Ounsdale Road Wolverhampton WV5 8BJ