

## Leeds City College and Keighley College

### Privacy & Cookies Statement

This Privacy & Cookies Statement (“**this Statement**”) explains our use of personal information, including how such information will be used, how we determine for how long we keep it and what your related rights are.

#### **1. Who are we?**

- 1.1 We are Leeds City College Further Education Corporation. Our head office and address for correspondence is at College House, Park Lane, Leeds, LS3 1AA.
- 1.2 We are committed to ensuring that all personal information we hold is treated properly and in accordance with applicable data protection legislation. We are registered as a data controller with the Information Commissioner’s Office and our registration number is Z5127931. In accordance with applicable data protection legislation, we are required to explain to you how we will treat any personal data which we collect about you.
- 1.3 This Statement applies to anybody who submits information to us (whether it is submitted via our website, by e-mail, over the telephone, in person or by any other means). However, please note that in certain circumstances we may process your information for additional purposes not mentioned in this Statement (e.g. if you enrol as a student or apply for a job with us), in which case we will provide you with additional details of how we will process your personal data in that context at the appropriate time.
- 1.4 You have the right to lodge a complaint with the Information Commissioner’s Office if you have any concerns with regard to the way in which we process your personal information. We would however appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.
- 1.5 You warrant that any information you supply to us is accurate and up to date (whether or not the information is about you), that you will inform us if any information that we hold about you requires updating, and that if you submit a third party’s details to us (including but not limited to via our website) you have that third party’s permission or another legal justification for doing so.

#### **2. What information do we collect and how do we use it?**

- 2.1 It is possible to visit and browse some sections of our website without being required to tell us who you are or reveal any information about you.
- 2.2 We may collect information from you when you interact with our website or when you correspond with us by telephone, email or otherwise. This may include your name, contact details and information connected with any related enquiry. We may use this information where necessary for our legitimate interests (so long as our interests are not overridden by the impact on you), for example in responding to any related enquiry.
- 2.3 Where you use our website, we may also collect information about where you are on the internet (e.g. the URL you came from, IP address and domain names like .co.uk and .com), your browser type, the country where your computer is located, the parts of our website that were viewed during your visit and any search terms that you entered on our website. We may collect this information even if you do not submit any information to us using our website, and will use it for our legitimate interests in administering and improving our website, for internal operations (including

troubleshooting, analysis of how our website is used, testing, research and statistical purposes) and as part of our efforts to keep our website safe and secure.

### **3. To whom may we disclose information?**

We may disclose information relating to you:

- 3.1 with third parties who are directly involved in dealing with any request, enquiry, complaint or other correspondence submitted by you which the information is relevant to;
- 3.2 with third parties who are providing us with professional advice which the information is relevant to where necessary for our legitimate interests and permitted by law;
- 3.3 where we are legally required to do so;
- 3.4 in connection with criminal investigations, legal proceedings or prospective legal proceedings which the information is relevant to where necessary for the related legitimate interests of us or a third party and permitted by law;
- 3.5 in order to establish, exercise or defend our legal rights where necessary for our legitimate interests and permitted by law; and
- 3.6 where we have stated or informed you otherwise.

### **4. Your rights**

- 4.1 You have a legal right to see a copy of the personal information that we keep about you and to require us to correct any inaccuracies, subject to certain exemptions. In some circumstances you may also have the right to:
  - (a) request that we erase any personal information held about you;
  - (b) restrict our processing of your personal information (for example to ask to suspend the processing of personal information to establish its accuracy or the reasons for processing it);
  - (c) data portability (i.e. to request the transfer of personal information to a third party); and
  - (d) object to our processing of your personal information where we are relying on a legitimate interest (or those of a third party) or the processing is carried out on the basis that it is necessary for the performance of a task in the public interest.
- 4.2 Requests in respect of the above should be made in writing to the Data Protection Officer, Leeds City College, Park Lane Campus, Leeds, LS3 1AA or via email to [gdp@leedscitycollege.ac.uk](mailto:gdp@leedscitycollege.ac.uk). Please contact the same address if you have any reason to believe that information we hold about you is inaccurate. We will respond to your request as soon as possible and, in any event, within one month from the date of receiving the request. Please note that we may, where legally permitted, reject any such request or limit the scope of our response (e.g. if, in the circumstances, the right does not apply to you).
- 4.3 In accordance with applicable data protection legislation, we follow security procedures in the storage and disclosure of your information. We may therefore request proof of your identity and rights before complying with any request of a nature described in section 4.1 above.

4.4 You will not generally have to pay a fee to exercise any of your rights described in section 4.1 above. However, we may charge a reasonable fee if you make a request to see a copy of your personal information which is clearly unfounded or excessive. Alternatively we may refuse to comply with your request in such circumstances.

## **5. Security and Retention**

5.1 We have put in place appropriate security measures to prevent personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to such personal information to those employees, agents, contractors and other third parties who have a valid need to know that information. However, the internet is global and no data transmitted via the internet can be guaranteed by us to be completely secure during transmission. We cannot guarantee the security of any information that you disclose online and we will not be responsible for any breach of security unless due to our negligence or wilful default. It is possible that the information that you provide to us will be temporarily transferred via a route outside the European Economic Area as it passes between us.

5.2 In certain circumstances we may use the services of a supplier outside the European Economic Area (EEA) for purposes referred to in this Statement (for example, we may use the services of SurveyMonkey and MailChimp from time to time to send certain types of electronic communications). This may involve your personal information being processed by the relevant supplier on our behalf outside of the EEA. If we do this, we will require the relevant supplier to put in place appropriate technical and organisational data protection security measures (for example, as part of our contract with the relevant supplier or by verifying that they operate under the EU-U.S. Privacy Shield framework (please see [www.privacyshield.gov](http://www.privacyshield.gov) for further details).

5.3 We have put in place procedures to deal with any suspected data security breach and will notify you and/or any applicable regulator of a suspected breach where we are legally required to do so.

5.4 Information submitted for a purpose described in this Statement will be retained for a reasonable period having regard to the relevant purpose for the information being used, following which it will be securely destroyed.

5.5 Whilst taking into consideration our legal obligations, we will on an ongoing basis: review the length of time that we retain personal data; consider the purpose or purposes for which we hold the personal data in deciding whether (and for how long) to retain it; securely delete personal data that is no longer needed for such purpose or purposes; and update, archive or securely delete information if it goes out of date.

## **6. How will you know if we make any changes to this Statement?**

6.1 This Statement does not form part of any contract.

6.2 We may amend this Statement at any time. If we make any changes to the way in which we use information submitted to any of our websites we will post a related update on our website's home page.

## **7. What about third party websites?**

7.1 Our website may contain links to other websites which are outside our control and are not covered by this Statement. If you access other websites using the links provided the operators of those websites may collect personal data from you which will be used in accordance with their respective

privacy policies which you should read. We are not liable for the practices of such third party website operators in respect of your personal information.

- 7.2 You acknowledge that any information that you post or submit using any of our social media facilities (such as any of our Facebook, Twitter, Instagram or YouTube pages) will be viewable by anybody that visits those facilities and that such information is also subject to the relevant provider's privacy policy. You are advised to consult each such privacy policy to see how they will use your data.

## **8. Cookies**

This website uses cookies for our legitimate interests in ensuring that you receive the best possible visitor experience. A cookie is a small file which is sent by a web server to an individual's computer which is then stored on that computer's hard drive. Further information on which cookies we deploy on this website is available in our Cookies Policy (a copy of which can be accessed by clicking [here](#)).

## **9. Data Processing in respect of Individuals other than Students/Staff**

- 9.1 We may also hold and use personal information in relation to individuals who are not College staff or students but who otherwise have a connection to a College student or the College's services. This information may include such a person's name, telephone number, e-mail address and other contact details. We will collect and use this information where necessary for our legitimate interests in the following circumstances:

- (a) personal information relating to a student's parent/carer will be used as necessary to contact them in relation to matters such as the student's non-attendance, emergencies and disciplinary matters involving the student; and
- (b) personal information relating to a student's or staff member's nominated emergency contacts will be used as necessary to contact them in relation to any emergency involving that student/staff member.

- 9.2 The information described above will be collected using the appropriate College form related to the relevant processing activity.

## **10. Contact**

If you have any questions about this Statement or our use of personal information, please contact our Data Protection Officer by email at [gopr@leedscitycollege.ac.uk](mailto:gopr@leedscitycollege.ac.uk) or by writing to the Data Protection Officer, Leeds City College, Park Lane, Campus, Leeds, LS3 1AA.