



## LICENSEE PRIVACY NOTICE

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<b>Related statutes or regulations</b>	
<b>Related policies/procedures/guidance/forms</b>	
<b>Staff member responsible for update</b>	Head of Compliance

### Amendment History

Version	Revision Summary	Date Approved	Author
Feb 21	Updated Data Protection Law, amended data retention paragraph		J Bradbury



# Licensee Privacy Notice

## 1. Introduction

Spurgeon's College is committed to looking after any personal information that you provide us with.

The College is the 'Data Controller' of your personal data and is subject to the General Data Protection Regulations (GDPR). We are registered with the Information Commissioner's Office (ICO).

This notice outlines how we use any personal information you have given us in relation to the Licensing agreement we have with you.

## 2. What personal information do we process?

We will retain the personal details you have provided us with in order for us to be able to fulfil our contractual obligations.

The details we may collect include name, address, contact numbers, email and financial information in relation to payments you make.

The College will also process some information that is considered more sensitive. This is referred to as 'special category' personal data in the General Data Protection Regulation and Data Protection Act 2018. When we process this type of information we are required to apply additional protections. Special category personal data is defined as racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, health or sex life and sexual orientation, genetic data and biometric data which is processed to uniquely identify a person. In the UK this also includes any personal information relating to criminal convictions and offences.

For example, we may process special category data you have given us in order to verify your identity (passport or driving licence).

## 3. How do we use your personal information?

We will only use your personal information for the purposes for which we collected it, unless we reasonably consider that we need to use it for another related reason and that reason is compatible with the original purpose. If we need to use your data for an unrelated purpose, we will seek your consent to use it for that new purpose.

We may process your information in order to:

- Fulfil contractual obligations we have with you under a licensing agreement
- Fulfil our legal obligations under financial regulations
- Because we have a legitimate interest to do so in order to allow us to respond to a request you have made.

We may store data you have given us manually or electronically, usually on email. The data is stored on our secure servers and/or within the College premises.

#### **4. Who do we share your personal information with?**

Unless we have a legal obligation to do so, we will not disclose your data to individuals, organisations or other entities outside the College, other than third parties who provide services on our behalf, if relevant, for example payment gateways. All our third-party service providers are required to take appropriate security measures to protect your data in line with our policies. We permit them to process your data only for specified purposes and in accordance with our instructions.

Certain third-party service providers, such as payment gateways and other payment transaction processors, have their own privacy policies in respect to the information we are required to provide to them for your purchase-related transactions. For these providers, we recommend that you read their privacy policies so you can understand the manner in which your personal information will be handled by these providers.

We do not sell to or trade your data with any other organisations.

We may also share your personal data with third parties if we are under a duty to disclose or share your personal data in order to comply with any legal obligation.

#### **5. International data transfer**

Although most of the information we store and process stays within the UK, some information may be transferred to countries outside the UK. This may occur if, for example, one of our trusted partners' (e.g. a payment provider) servers is located in a country outside the UK. Where these countries do not have similar data protection laws to the UK, we will take steps to make sure they provide an adequate level of protection in accordance with UK data protection law.

#### **6. How long do we keep your information for?**

We will only retain your data for as long as we need it to fulfil our purposes, including any relating to legal, accounting, or reporting requirements. Details of how long different categories of personal information are retained by the College are published in the Records Retention Schedule.

Details provided under licensing agreements will be kept for 6 years from the date of the agreement. As soon as practicable after that your information is securely destroyed or deleted.

## **7. How do we protect your personal information?**

We are committed to holding your data securely and treating them with sensitivity. All data are held securely and in accordance with the Data Protection Act 2018 Your data are held on a database hosted on a secure server within the College's IT network.

We limit access to your personal information to those employees and other third parties who have a business need to know. They will only process your personal information on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected data breach. If you suspect a data breach has occurred at the College, the organisation has a duty to report this to the Information Commissioners Office (ICO) within 72 hours. Please report suspected data breaches to the Data Protection Officer as soon as you can.

## **8. Your rights and how to contact us**

We will always try to ensure that the data we hold for you are up to date, reasonable and not excessive. In certain circumstances, by law you have the right to:

- Be informed as to how we use your data (via this Privacy Notice)
- Access or request a copy of the data we hold about you
- Update, amend or rectify the data we hold about you
- Change your communication preferences at any time to restrict how we process your data, or opt out of some or all communication from us
- Ask us to remove your data from our records
- Withdraw consent, where it is used as a legal basis for processing
- Object to or restrict the processing of your information for any of the purposes outlined above.

If you want to review, verify, correct or request erasure of your personal information, object to the processing of your personal data, or request that we transfer a copy of your personal information to another party, please contact the Data Protection Officer.

You will not have to pay a fee to access your personal information (or to exercise any of the other rights). However, we may charge a reasonable fee if your request for access is clearly unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances.

We may need to request specific information from you to help us confirm your identity and ensure your right to access the information (or to exercise any of your other rights). This is another appropriate security measure to ensure that personal information is not disclosed to any person who has no right to receive it.

If you have any questions about this Privacy Notice, your data rights, or would like to receive a copy of the information we hold about you, please contact:

Rev Helen Stokley  
Data Protection Officer  
Spurgeon's College  
South Norwood Hill  
London  
SE25 6DJ  
dpo@spurgeons.ac.uk      +44 (0)20 8653 0850

If you feel that we have let you down in relation to your information rights then please contact us so that we can discuss this with you and rectify the situation.

You can also make complaints directly to the Information Commissioner's Office (ICO). The ICO is the independent authority upholding information rights for the UK. Their website is [ico.org.uk](https://ico.org.uk) and their telephone helpline number is 0303 123 1113.

If our information practices change at some time in the future, we will always post the policy changes on this page.