



GDPR: DATA PRIVACY NOTICE FOR MEMBERS, CLIENTS AND SUPPLIERS

Introduction

Plymouth Learning Partnership (PLP) is a trading name of PAPH Co-Operative CIC. PAPH Co-Operative CIC ("We") are committed to protecting and respecting your privacy.

This policy and any other documents referred to on it, sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us. Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it.

The rules on processing of personal data are set out in the General Data Protection Regulation (the "GDPR").

1. Definitions

Data controller - A controller determines the purposes and means of processing personal data.

Data processor - A processor is responsible for processing personal data on behalf of a controller.

Data subject – Natural person

Categories of data: Personal data and special categories of personal data

Personal data - The GDPR applies to 'personal data' meaning any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier (as explained in Article 6 of GDPR). For example name, passport number, home address or private email address. Online identifiers include IP addresses and cookies.

Special categories personal data - The GDPR refers to sensitive personal data as 'special categories of personal data' (as explained in Article 9 of GDPR). The special categories specifically include genetic data, and biometric data where processed to uniquely identify an individual. Other examples include racial and ethnic origin, sexual orientation, health data, trade union membership, political opinions, religious or philosophical beliefs.

Processing - means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

Third party - means a natural or legal person, public authority, agency or body other than the data subject, controller, processor and persons who, under the direct authority of the controller or processor, are authorised to process personal data.

2. Who are we?

PAP Co-Operative CIC is the data controller. This means we decide how your personal data is processed and for what purposes. Our contact details are: Douglass House, Douglass Road, Efford, Plymouth, PL3 6NP, Tel: 01752 7880876. For all data matters contact our Data Representative, Chris Trumfield by email ctrumfield@plpcic.co.uk or by telephone 01752 783787.

3. The purpose(s) of processing your personal data

We use your personal data for the following purposes:

- Where we provide services to members under a Service Level Agreement including;
 - Undertake non-statutory services such as Child & Family support through our Multi-Agency Support Team (MAST)
 - Protecting individuals from potential harm
 - Undertake statutory duties on behalf of the local authority or central government
 - Support services for school's Human Resources, Property & Compliance and Financial functions
 - Management and implementation of Schools Post employment and recruitment function

- Where we need to perform the contract we are about to enter into or have entered into with the individual or some other third party (e.g. a client or supplier, such as a company or another individual)
- Where it is necessary for our legitimate interests (or those of a third party) and the individual's interests and fundamental rights do not override those interests
- Where we need to comply with a legal or regulatory obligation
- To manage our employees
- To manage our Supply+ workers (instructed and managed under Agency Workers Regulations)
- To maintain our own accounts and records
- To inform individuals of new, events or activities
- You may give us information about you by filling in forms on our site www.plpcic.co.uk by corresponding with us by phone, e-mail or otherwise. This includes information you provide when you register to use our site, subscribe to our service, participate in discussion boards or other social media functions on our site, enter a competition, promotion or survey, and when you report a problem with our site.

4. The categories of personal data concerned

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

With reference to the categories of personal data described in the definitions section, we process the following categories of your data (grouped for relevance):

- **Identity Data** includes names, usernames or similar identifier, marital status, title, job title, name of employer, date of birth, gender, copies of passports, driving licences, birth certificates, and other documents that prove identity, plus details relating to your job, experience, qualifications, your behaviour, preferences, hobbies and interests.
- **Contact Data** includes address, email address and telephone numbers.
- **Financial Data** includes bank account and payment card details and National Insurance and tax details.

- **Transaction Data** includes details about payments to and from you and other details of services individuals have purchased from us.
- **Technical Data** includes internet protocol (IP) address, login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices used to access our website.
- **Profile Data** includes usernames and password, interests, preferences, feedback and survey responses.
- **Usage Data** includes information about usage of our website, products, offices, facilities, and services.
- **Marketing and Communications Data** includes preferences in receiving marketing and communications from us and our third parties and communication preferences.
- **Special Category Data** includes personal data in regard to race, ethnic origin, politics, religion, health (mental and/or physical), sex life and sexual orientation.

5. What is our legal basis for processing your personal data?

a) Personal data (article 6 of GDPR)

Our lawful basis for processing your general personal data:

<ul style="list-style-type: none"> • Consent of the data subject
<ul style="list-style-type: none"> • Processing necessary for the performance of a contract with the data subject or to take steps to enter into a contract
<ul style="list-style-type: none"> • Processing necessary for compliance with a legal obligation
<ul style="list-style-type: none"> • Processing necessary to protect the vital interests of a data subject or another person
<ul style="list-style-type: none"> • Processing necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller
<ul style="list-style-type: none"> • Processing necessary for the purposes of the legitimate interests of the data controller or a third party, except where such interests are overridden by the interests or fundamental rights or freedoms of the data subject

b) Special categories of personal data (article 9 of GDPR)

Our lawful basis for processing your special categories of data:

<ul style="list-style-type: none"> • Explicit consent of the data subject
<ul style="list-style-type: none"> • Processing necessary for carrying out obligations under employment, social security or social protection law, or a collective agreement
<ul style="list-style-type: none"> • Processing necessary to protect the vital interests of a data subject or another individual where the data subject is physically or legally incapable of giving consent

More information on lawful processing can be found on the [ICO website](#).

6. Sharing your personal data

Your personal data will be treated as strictly confidential and will be shared **only** if there is a valid lawful basis to do so. When there is a valid lawful basis to share personal data; the organisations that this personal data will be shared with include Local or Central Government, Statutory Social Support Services, Police, Fire Brigade or other governmental departments

7. Your rights and your personal data

Under certain circumstances, you have rights under data protection laws in relation to your personal data. These rights include:

YOUR RIGHTS AND YOUR PERSONAL DATA

Request access to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.

Request correction of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.

Request erasure of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

Object to processing of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

You also have the right to object where we are processing your personal data for direct marketing purposes. **Request restriction of processing** of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

Request the transfer of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

Withdraw consent at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

If you wish to exercise any of the rights set out above, please contact us.

No fee usually required

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

What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

Time limit to respond

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

8. How long do we keep your personal data?

We will only retain personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

Details of retention periods for different aspects of your personal data are available in our retention policy which you can request from us by contacting us.

9. Transfer of Data Abroad

We do not transfer personal data outside the EEA.

10. Automated Decision Making

We do not use any form of automated decision making in our business.

11. Further processing

If we wish to use your personal data for a new purpose, not covered by this Data Privacy Notice, then we will provide you with a new notice explaining this new use prior to commencing the processing and setting out the relevant purposes and processing conditions.

12. Changes to our privacy policy

Any changes we may make to our privacy policy in the future will be posted on this page and, where appropriate, notified to you by e-mail. Please check back frequently to see any updates or changes to our privacy policy.

13. How to make a complaint or contact us

To exercise all relevant rights, queries or complaints please in the first instance contact our Data Representative, Chris Trumfield by email ctrumfield@plpcic.co.uk or by telephone on 01752 783787.

If this does not resolve your complaint to your satisfaction, you have the right to lodge a complaint with the [Information Commissioners Office](https://ico.org.uk/global/contact-us/email/) on 03031231113 or via email <https://ico.org.uk/global/contact-us/email/> or at the Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF, England.