LEITHS EDUCATION

Privacy Notice for Events, Dry Hire & Short Courses

In accordance with the General Data Protection Regulation (GDPR), we have implemented this privacy notice to inform you of the types of data we process about you. We also include within this notice the reasons for processing your data, the lawful basis that permits us to process it, how long we keep your data for and your rights regarding your data.

A) Data Protection Principles

Under GDPR, all personal data obtained and held by us must be processed according to a set of core principles. In accordance with these principles, we will ensure that:

a) processing is fair, lawful and transparent
b) data is collected for specific, explicit, and legitimate purposes
c) data collected is adequate, relevant and limited to what is necessary for the purposes of processing
d) data is kept accurate and up to date. Data which is found to be inaccurate will be rectified or erased without delay
e) data is not kept for longer than is necessary for its given purpose
f) data is processed in a manner that ensures appropriate security of personal data including protection against unauthorised or unlawful processing, accidental loss, destruction or damage by using appropriate technical or organisation measures
g) we comply with the relevant GDPR procedures for international transferring of personal data

B) Types of Data Held

We keep several categories of personal data about you in order to carry out effective and efficient processes. We keep this data in a file relating to each event or course and we also hold the data within our computer systems, for example, our accounts systems.

Specifically, we hold the following types of data:

a) personal details such as name, address, phone number, email address
b) date of birth
c) emergency contact information
d) dietary requirements
e) information relating to physical or mental health (where applicable)
f) payment details
g) gender
h) CCTV footage
i) photographs (where applicable)
j) building access card records

C) Collecting your Data

We collect most personal information directly from you when you make an enquiry, book an event, arrange a dry hire, register for a short course or communicate with us.

In some cases, we will collect data about you from third parties, such as intermediaries who may act as an introducer.

Personal data is kept in secure files or within Leiths IT systems.

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D) Lawful basis for processing

The law on data protection allows us to process your data for certain reasons only. These reasons are:

a) **Consent** – the individual has given permission, which must be specific and freely given
b) **Contract** – processing is necessary to provide services under a contract with the individual
c) **Legal obligation** – processing is required by law
d) **Vital interests** – processing is necessary to protect someone's life
e) **Public task** – processing is necessary to perform a public function

Legitimate interests – processing is necessary for a legitimate business purpose that does not override the individual's rights

In the main, we process your data in order to comply with a legal requirement, in order to perform the contract we have with you or in pursuit of our legitimate interests.

The information below categorises the types of data processing we undertake and the lawful basis we rely on.

Activity requiring your data	**Lawful basis**
Administering applications, enrolment and participation on a course or event, including using your name, contact details and other relevant information	Performance of the contract
Delivering educational services and communicating with you about your studies	Performance of the contract
Collecting fees and processing payments	Performance of the contract
Making decisions about admissions and suitability for programmes	Legitimate interests
Planning, managing and improving our courses, facilities and services	Legitimate interests
Managing complaints, disciplinary matters, safeguarding concerns and legal claims	Legitimate interests and Legal obligation
Preventing fraud, misconduct and other unlawful activity	Legitimate interests and Legal obligation
Ensuring our administrative, educational and IT systems are secure and protected against unauthorised access	Legitimate interests
Maintaining health and safety and responding to emergencies	Legitimate interests and Legal obligation
Sharing information with awarding bodies, regulators or accrediting organisations where required	Legal obligation and/or performance of the contract

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E) Special categories of data

Special categories of data are data relating to your:

a) health
b) sex life
c) sexual orientation
d) race
e) ethnic origin
f) political opinion
g) religion
h) trade union membership
i) genetic and biometric data.

Most commonly, we will process special categories of data when the following applies:

a) you have given explicit consent to the processing
b) we must process the data in order to carry out our legal obligations
c) we must process data for reasons of substantial public interest
d) you have already made the data public.

We do not need your consent if we use special categories of personal data in order to carry out our legal obligations. However, we may ask for your consent to allow us to process certain particularly sensitive data. If this occurs, you will be made fully aware of the reasons for the processing. As with all cases of seeking consent from you, you will have full control over your decision to give or withhold consent and there will be no consequences where consent is withheld. Consent, once given, may be withdrawn at any time. There will be no consequences where consent is withdrawn.

F) Failure to provide data

Your failure to provide us with data may mean that we are unable to fulfil our requirements for entering into a contract with you or performing the contract that we have entered into.

G) Who we share your data with

Employees within our company who have responsibility for events, administration of payment and carrying out the performance of a contract will have access to data which is relevant to their function. All employees with such responsibility have been trained in ensuring data is processed in line with GDPR.

Data may be shared with third parties for the following reasons:

- Awarding Organisations to ensure course certification
- IT Service Providers for administration purposes

Some of our service providers may process personal information outside the UK or EEA. Where this occurs, we ensure that appropriate safeguards are in place, such as adequacy regulations or approved international data transfer agreements, to protect your personal information.

H) Protecting your data

We are aware of the requirement to ensure your data is protected against accidental loss or disclosure, destruction and abuse. We have implemented processes to guard against such.

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I) Retention periods

We retain your personal information only for as long as necessary for the purposes for which it was collected, including to comply with legal, accounting and reporting requirements. Further details are available in our Data Retention Policy.

J) Automated decision making

Automated decision making means making decision about you using no human involvement e.g. using computerised filtering equipment. We do not carry out automated decision-making or profiling that produces legal or similarly significant effects on individuals.

K) Data subject rights

You have the following rights in relation to the personal data we hold on you:

a) the right to be informed about the data we hold on you and what we do with it
b) the right of access to the data we hold on you. More information on this can be found in our separate policy on Subject Access Requests
c) the right for any inaccuracies in the data we hold on you, however they come to light, to be corrected. This is also known as 'rectification'
d) the right to have data deleted in certain circumstances. This is also known as 'erasure'
e) the right to restrict the processing of the data
f) the right to transfer the data we hold on you to another party. This is also known as 'portability'
g) the right to object to processing in certain circumstances
h) the right to regulate any automated decision-making and profiling of personal data.

More information can be found on each of these rights in our separate policy on your rights in relation to your data.

L) Consent

Where you have provided consent to our use of your data, you also have the right to withdraw that consent at any time. This means that we will stop processing your data.

M) Making a complaint

If you have any concerns about how your personal information is handled, please contact our Data Protection Officer in the first instance.

Alternatively, you are able to raise a complaint with the Information Commissioner (ICO). You can contact the ICO at Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF or by telephone on 0303 123 1113 (local rate) or 01625 545 745.

N) Data Protection Compliance

Leiths School of Food and Wine Limited is the Data Controller responsible for the personal information described in this notice.

Our appointed Data Protection Officer (DPO) is:

Sophie Kidd - sophie.kidd@leiths.com