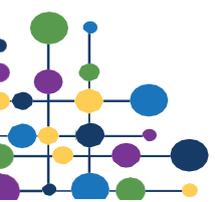
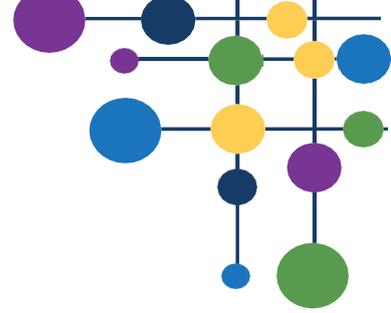


## **VISITORS PRIVACY NOTICE FOR USE WITHIN THE TRUST**

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Name of policy writer	Natalie McSheffrey
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## Introduction

SHARE Multi-Academy Trust is the data controller for the use of personal data in this privacy notice.

This privacy notice advises visitors of the trust’s data protection responsibilities on the collection and processing of their personal information.

We collect and process your personal data to assist in the running of the trust and its schools and to manage the employment relationship of, or otherwise manage, those who are engaged to work or perform services for us.

We are committed to being transparent about how we collect and use that data and to meeting our data protection obligations.

## The categories of information that we process

The categories of personal information that we process include the following:

- Contact details
- Name
- Information relating to your visit (i.e. your organisation, arrival time and departure, car registration plate)
- Photograph on arrival
- Proof of DBS (if required)
- Any health conditions which may affect your visit.

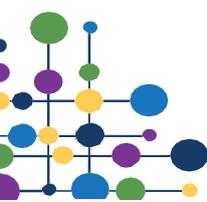
This list is not exhaustive.

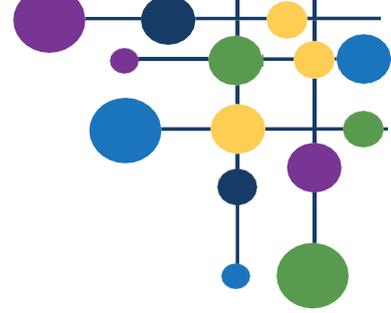
In addition, concerning any special category data including criminal offence information:

Processing is necessary for the purpose of carrying out the obligations in the field of employment law as detailed in paragraph 2 (b) of GDPR - Article 9 and set out in condition 1 of Schedule 1 of the DPA 2018. Disability and access requirements.

## Why we collect and use your information

We will only collect visitor information when we have a good reason to do so in line with the law – this is known as having a lawful basis to use data. Here are the reasons





we collect your information:

- a) Identify you and keep you safe whilst you are on site
- b) Keep pupils within its schools safe
- c) Maintain accurate records of visits to each of its sites
- d) Provide appropriate access requirements.

Under the UK General Data Protection Regulation (GDPR), the lawful bases we rely on for processing pupil information are:

- for the purpose of (a), (b), (c) and (d) in accordance with the legal basis of public task: collecting the data is necessary to perform tasks that the trust and its schools are required to perform as part of their statutory function
- for the purpose of (a), (b) and (d) in accordance with the legal basis of vital interests: to keep pupils and you safe
- for the purpose of (c) in accordance with the legal basis of legal obligation: fulfilling our statutory reporting requirements to the Department for Education (DFE)

In addition, concerning any special category data:

- In the case of religious beliefs: in accordance with condition (e) of [UK GDPR – Article 9.](#): Made public by the data subject
- In the case of health information: in accordance with condition (c) of [UK GDPR – Article 9.](#): processing is necessary to protect the vital interests of the data subject and in accordance with condition (i) of [UK GDPR – Article 9.](#): processing is necessary for public health
- In the case of legal claims: in accordance with condition (f) of [UK GDPR – Article 9.](#): processing is necessary for the establishment, exercise or defence of legal claims or whenever courts are acting in their judicial capacity.

## Storing your information

We hold data securely for the set amount of time shown on our data retention schedule.

For more information on our data retention schedule and how we keep your data safe, please visit our data protection policies available on SHARE Multi-Academy Trust's website.

We take the security of your personal data very seriously. We have internal policies and controls in place to try to ensure that data is not lost, accidentally destroyed, misused or disclosed, and is not accessed except by our employees in the performance of their duties.

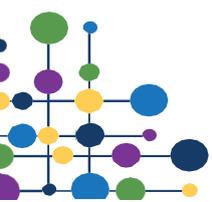
Where we engage third parties to process personal data on our behalf, they do so based on written instructions, are under a duty of confidentiality and are obliged to implement appropriate technical and organisational measures to ensure the security of data.

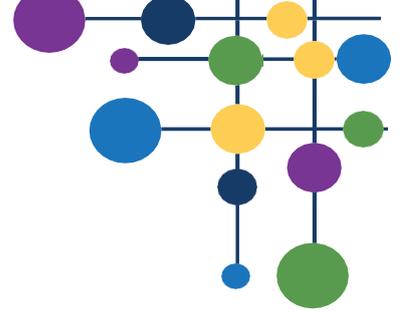
## Who we share your information with and why

We do not share information about you with anyone without your consent, unless the law and our policies allow us to do so.

In line with a legal requirement, we may share your personal data with (but not limited to):

- The Local authority- to meet any legal or statutory requirements associated with visitor information and safeguarding
- Police and legal forces - in order to uphold law and order
- Central and local government - to meet statutory and legal duties and to enable the performance of contracts
- The trust auditors - to demonstrate that it has taken appropriate measures in providing its educational services



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- Health authorities - to assist where there are legal obligations
  - Security organisations - with regard to legal or safeguarding investigations, and to assist in crime prevention, detection and prevention of fraud
  - Professional bodies - to verify information for legal purposes
  - The organisation/company that you are representing - to verify business interest and to verify information for legal purposes
  - Professional advisers and consultants - to comply with entitlements and assist with any claims.

## The use of Artificial Intelligence (AI)

SHARE MAT only use Microsoft 365 Copilot, which is an AI-powered activity tool integrated within Microsoft 365 applications and follows strict data security and privacy commitments as set out below:

**Data Collection:** Copilot prompts and inputs are securely processed using Azure OpenAI services. This includes data such as location, IP address, system information, and browser information.

**Data Processing:** Microsoft ensures that organisational data remains protected. The data is processed within the Microsoft 365 Graph, inheriting all existing security, privacy, identity, and compliance requirements.

**Data Storage:** Data is stored securely and encrypted. Microsoft ensures that data is not shared without permission and is not used to train foundation models without consent.

**Privacy Commitments:** Microsoft has outlined several commitments to protect data, including keeping organisations' data private, maintaining access control and enterprise policies, and complying with global data protection regulations.

## Requesting access to your personal data

Under data protection legislation, you have the right to request access to information about you that we hold. To make a request for your personal information, contact the trust's Data Protection Officer at [jayne.newson@sharemat.co.uk](mailto:jayne.newson@sharemat.co.uk).

You also have the right to:

- Restrict our processing of your personal data, i.e. permitting its storage but no further processing
- Object to direct marketing (including profiling) and processing for the purposes of scientific and/or historical research and statistics
- Have your personal data rectified if it is inaccurate or incomplete
- Not be subject to decisions based purely on automated processing where it produces a legal or similarly significant effect on you
- Request the deletion or removal of personal data where there is no compelling reason for the continued processing.

## The right to raise concerns, complaints or withdrawal of consent

If you are concerned about the way we are collecting or using your information, please raise your concern with us in the first instance to the data protection officer at [Jayne.newson@sharemat.co.uk](mailto:Jayne.newson@sharemat.co.uk). You can also contact the Information Commissioner's Office (ICO) at <https://ico.org.uk/concerns>. The ICO is the UK's independent authority set up to uphold information rights in the public interest, promoting openness by public bodies and data privacy for individuals.

Where we are processing your personal data with your consent, you have the right to

withdraw that consent. If you change your mind, or you are unhappy with our use of your personal data, please let us know by contacting the trust's Data Protection Officer at [Jayne.newson@sharemat.co.uk](mailto:Jayne.newson@sharemat.co.uk).

### **How can you find out more information?**

If you would like to discuss anything in this privacy notice, please contact the DPO on [jayne.newson@sharemat.co.uk](mailto:jayne.newson@sharemat.co.uk).

If you require further information about how we and/or the DfE store and use your personal data, please visit our [website](#) where you can find the latest version of our Data Protection Policy, or the Gov.UK website (<https://form.education.gov.uk>).

