PRIVACY NOTICE – Lettings & Other Customers

INTRODUCTION

Heathfield Community College is a 'data controller' for the purposes of the Data Protection Act (2018) & UK GDPR as amended by the Data Use & Access Act 2025. We collect a small amount of data about our lettings and other customers.

We ensure that your personal information is:

- processed legally
- processed fairly
- correct
- stored safely
- kept for no longer than needed (see our retention schedule on the College website http://www.heathfieldcc.co.uk/?page_id=1595711)
- is deleted as soon as possible after the expiry of the retention period

This document describes:

- why we collect data about you
- what data we collect
- what we do with the data we collect
- what your rights are.

WHY DO WE COLLECT INFORMATION ABOUT YOU?

The legal basis for collecting your information is as follows:

- we have a legal obligation for the safeguarding of students when you are in College
- it is in the public interest for us do so
- to fulfil our side of the lettings or other contract
- maintain "public health", for example during a pandemic
- perform tasks that are in the substantial public interest for the processing of special category data
- comply with your consent for the processing of personal data and your explicit consent for the processing of special category data. If we need your consent, we will let you know.

Please see the College's Special Category Data policy for more information about how we process this type of data. This policy can be found on the College Data Protection page at: http://www.heathfieldcc.co.uk/?page_id=1595711

WHAT INFORMATION DO WE COLLECT ABOUT YOU?

We collect the following information about our lettings customers:

- names (business & personal) & contact details; DBS information
- insurance documentation, risk assessments & related safeguarding policies
- special categories of data including characteristics information such as gender, age, ethnic group disability/access requirements.
- to ensure you are kept safe whilst on site we ask for data about any allergies that you have.
- whilst on site your image may be recorded on our CCTV

We collect the following information about our other customers:

- names (business & personal) & contact details

HOW DO WE STORE YOUR DATA AND FOR HOW LONG?

Your data is stored securely in line with our policies on data protection and online safety and IT security. We keep your data only for as long as we need to process it. The document that guides for how long we keep specific types of data is called our retention schedule. The retentions schedule can be found on the data protection page of the College website: http://www.heathfieldcc.co.uk/?page_id=1595711

Heathfield Community College and Sixth Form

PRIVACY NOTICE – Lettings & Other Customers

DO WE SHARE YOUR INFORMATION?

We may use Artificial Intelligence (AI) tools to help us work more efficiently with your personal data. When we do so, we only use those tools that do not include the user inputs as part of their learning processes. In all other circumstances, we don't share information about our lettings and classified advertising customers without consent unless the law and our policies allow us to do so. We may share lettings customer information with East Sussex County Council (the local authority) to provide insurance cover for the letting. We will only share classified advertising customer information with legal authorities if asked to do so in line with a formal investigation.

TRANSFERRING DATA INTERNATIONALLY

We do not store or transfer your data outside of the College apart from when using our management information system (Arbor) or UNLESS you use email to contact us OR we use AI enhanced tools to process your data. In the latter case the data will be temporarily transferred to the USA before being deleted by the AI tool. All incoming emails are received by us after having been transferred to a malicious email filtering system that may involve a temporary transfer of all emails outside of the UK and EEA. We do this to reduce the risk of the College IT systems being attacked by malicious outside forces. Where information is stored, even temporarily, outside of the UK we also ensure that that personal data is protected in the same way that it is in UK law.

WHAT ARE YOUR RIGHTS?

There are circumstances when these rights don't apply, for example if a law says we need to keep specific pieces of information, or if not processing the data places a student in danger. Your rights are:

- **The right of access** (a "Subject Access Request"). This means you can ask for a copy of the data we hold about you. Contact details for this can be found below. We will comply within ONE calendar month
- **The right to be informed.** This means that we will tell you when we are collecting data about you and what it is being used for.
- **The right to rectification**. This means you can ask us to fix omissions and errors in your data
- **The right to erasure**. This means that you have the right to have information we hold deleted.
- **The right to restrict processing**. This means we can still hold the data, but can't use it.
- **The right to object**. This means you can object to processing of personal data under certain circumstances. If we had to ask for your consent, you can withdraw consent at any time. Consent can be withdrawn by writing to the address below.

If you have a concern about the way we are collecting or using your data, please contact us in the first instance or directly to the Information Commissioner's Office at https://ico.org.uk/concerns/

HEATHFIELD COMMUNITY COLLEGE DATA PROTECTION OFFICER CONTACT INFORMATION

Data Protection Officer contact details: Sarah Oxenbury, Children's Services, ESCC.
Schools.dpo@eastsussex.gov.uk

REQUESTING ACCESS TO YOUR PERSONAL DATA

In the first instance, you should **contact the Data Protection Lead** in writing at the address below. Subject access and other information requests should be made on the appropriate form and you will need to provide appropriate identification. Forms and guidance can be found on the Data Protection page of the website - here.
If you wish to contact us by email, please email DataProtection@heathfieldcc.co.uk . Please DO NOT contact the main office email address as we cannot guarantee your email will reach its intended destination in a timely way.

The Head Teacher / Data Protection Lead, Heathfield Community College, Cade St, Heathfield, East

Heathfield
Community College and Sixth Form

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Sussex, TN21 8RJ, Tel: 01435 866066