

## Privacy Notice

Your privacy is important to us and we want you to feel comfortable with how we use your personal information. This privacy notice sets out how Esher Sixth Form College handles your personal information, including when and why it is collected, how it's used, and your rights in relation to the personal data we hold.

This privacy notice will be reviewed regularly and any changes will be notified to you by posting an updated version on our website, and where possible by contacting you via email.

### What information do we collect about you?

As well as the information you have provided in your application, we also collect the following:

- The status of your application, including the times and dates your application moved between different stages.
- Notes made by members of staff, including interview, medical, learning support and welfare notes.
- Invitations, appointments and your attendance at events such as Information Evening and Introduction Day.
- IT security and audit logs, such as the last time you logged on to the Online Applications system and your IP address.
- CCTV footage when you are on the College campus.
- Email conversations with you, or about you.

### Where do we get information about you?

All of the information we hold about you either comes directly from you, or is generated by us as we process your application.

### Why we collect and use your information, and the lawful basis for doing so

The purposes for which we use your information and the legal basis on which we rely are as follows:

- By submitting an application to the College you are asking us to take steps towards entering into a **contract** with you to provide a place at the College. The majority of the information we collect about you is necessary to process your application.
- Data protection legislation classifies some of the information we collect as sensitive, and we require your **consent** to process it. This includes your ethnic origin, gender and medical information. We use your medical information to help support you while at College, and it enables us to apply for Exam Access Arrangements where appropriate. By providing this information during the application process, we are able to ensure that the necessary support is in place as quickly as possible after you enrol. We also need your **consent** to carry out some marketing activities; we collect this consent when you fill in your application form.
- Some information we collect is used to fulfil our **legal obligations**, for example;
  - collecting your consent to receive marketing emails from us in order to comply with data protection legislation
  - monitoring equality and diversity

- We also process your data where it is necessary for the pursuit of our **legitimate interests**, such as;
  - monitoring IT systems to ensure their security, availability and to improve the services we offer;
  - recording CCTV to ensure the security and safety of the College campus and its community;
  - carrying out marketing activities;
  - monitoring the number of applications from different schools and postcodes.

### How long we keep your information

- If your application is successful and you enrol at the College, we will provide you with an additional privacy notice explaining how we process your data as a student at the College.
- If you do not enrol at the College all your information will be deleted, or anonymised for statistical monitoring, 12 months after the start of the academic year for which you applied.
- We keep CCTV footage for up to 60 days, unless a specific incident has occurred and the images are saved for an investigation. In this situation, the images may be stored for up to 6 years.
- IT security and audit logs are kept for up to 12 months.
- By default, our email system will delete emails you send us 3 years after they are received. Staff may however choose to delete them sooner, or keep them for up to 6 years.

### Who we share your information with

Your personal data will be shared with a number of third parties, including:

- Your parents/guardians.
- Surrey County Council, other local authorities and your previous school. We do this to assist them with their statutory duties under the Education and Skills Act 2008 to support the participation of young people in education, employment or training. Information shared may include your name, contact details, date of birth, application status and enrolment status.
- We may also share basic details, such as your name, address and email address with third-party service providers such as;
  - Loqate, in order to provide address lookup and validation functionality to you within the Online Applications system.
  - Instagram, Facebook and other marketing platforms, and/or marketing consultants

### Transferring your data outside of the European Economic Area (EEA)

We do not transfer your information outside of the European Economic Area (EEA).

### Security

The College takes the security of your personal data very seriously. We have implemented strong organisational and technical security safeguards to prevent unauthorised disclosure or access to your information.

Data Sharing Agreements or contractual obligations are in place with all organisations we share your personal data with, and strong encryption will be used when sharing your data electronically.

The College complies with all relevant data protection legislation.

## Your rights

If you have any queries about this privacy notice or how we process your personal data, we would ask you to raise your concern with us in the first instance by contacting the Colleges Data Protection Officer:

The Data Protection Officer  
Esher Sixth Form College  
Weston Green Road  
Thames Ditton  
KT7 0JB

Email: [dataprotectionofficer@esher.ac.uk](mailto:dataprotectionofficer@esher.ac.uk)  
Telephone: +44 208 398 0291

If you are not satisfied with how we process your personal data, or how we have handled your query, you can make a complaint to the Information Commissioner. (<https://ico.org.uk/concerns>)

## Access to your information

You have the right to request a copy of the information that we hold about you. We will provide this information to you free of charge and within 30 days.

## Transferring your data

You have the right to request a copy of your personal data in a commonly used machine-readable format such as CSV or Microsoft Excel XLSX so that you can transfer your data to another organisation. We have to provide this to you free of charge and process your request within 30 days. You can also ask us to send your data directly to another organisation.

## Correcting mistakes

You have the right to request we update any information we hold about you if you think, it is incorrect, incomplete or out of date.

If we believe the information we hold about you is correct, we may refuse to update our records, but we will note your objection.

## Objecting to how we process your data

Where we rely on *Legitimate Interests* or *Public Interest* as the legal basis for processing your personal data, you have the right to object, on grounds relating to your particular situation, to us processing your personal data where you feel the processing has a disproportionate impact on your rights.

## Withdrawing consent

Where we have obtained your consent to use your data you have the right to withdraw consent at any time and ask us to stop processing your data.

Withdrawing consent may affect the services and support we can offer you.

## Automated processing

When applying to the college, our online applications system will make an automated decision about whether your application is guaranteed or open. This decision is made based on the criteria set out in the College's Admissions Policy. You have the right to ask for a member of staff to double check this automated decision.

## The right to be forgotten

You can ask us to erase your personal data in the following situations:

- The data is no longer necessary in relation to the purpose for which it was originally collected.
- You have withdrawn consent.
- You have objected to us processing the data and there is no overriding legitimate interest for us to continue the processing.
- Your personal data was unlawfully processed.
- Your personal data has to be erased in order to comply with a legal obligation.

We may in some circumstances refuse to erase your personal data. If we do this, we will explain why and our legal basis for doing so.

## Restricted processing

In the following situations, you can tell us to stop or restrict the processing of your personal data.

We will continue to store the data, but we will only be able to use it in the ways you specify.

- You have asked us to update your data, and you want us to stop using it until we have updated it.
- You have objected to the way in which we process your data and you want us to stop using it until we have finished evaluating your objection.
- We processed your data unlawfully and you want us to restrict access to the data instead of deleting it.
- We no longer need the data, but you require it to establish, exercise or defend a legal claim.

You can find out more about your rights under data protection legislation from the Information Commissioner's Office website: <https://www.ico.org.uk>.