

## Communications and Media/Marketing Privacy Notice



Suffolk New College produces learning materials to improve our delivery of skills, and seeks promote the work we do for learners and the wider community. To produce marketing and learning materials, we may record the personal information of individuals and we are required to ensure that you are aware of how your information will be used.

### What is 'personal information'?

'Personal information' means any information which relates to or identifies you as an individual.

### Who will process my personal information?

The information provided here applies to the use, sharing and disclosure of your personal information by Suffolk New College ([www.suffolk.ac.uk](http://www.suffolk.ac.uk)). The College's Designated Data Controller is Mary Gleave, Associate Principal at Suffolk New College.

### What personal information will be processed?

For the production of marketing, training/example and awareness media materials

- Photographs and video material including audio
- Personal profile/case study and statements made by individuals engaged by the College

For the purposes of contacting potential applicants and marketing to other company contacts and individuals:

- Contact details, including at name, title, email address, postal address and telephone numbers.

### Is there a statutory or contractual obligation to provide personal data?

Individuals are not under any statutory or contractual obligation to provide additional personal data for the purposes outlined in this notice. However, providing certain personal data may be necessary to participate in specific activities or receive certain services from the College. If you choose not to provide the required personal data, it may limit your ability to engage in these activities or receive these services.

### What is the purpose and legal basis of the processing?

The College plays a role in the region both as a training and skills provider, and an employer. The College therefore, as would be expected has legitimate interest in:

- Seeking to promote its profile and reputation via marketing and communications with regard to services offered to the community, in particular courses, skills, training and employer engagement activities.
- Seeking to improve the learning and training offered to students by creating learning content and materials, examples of training/skills to new and future students.
- Seeking to create awareness and messaging campaigns (for example, concerning health and safety, activities) internally for existing staff, students and other individuals engaged by the College.
- Where possible, will use your consent to capture and process your personal information.

For example, before emailing you directly, or before capturing you in an individual photo or case study.

This includes where the College has some means of quickly identifying all participants, for example, if a tutor wishes to record a workshop activity in a lesson, in order to produce training materials, specific consent of the students will be obtained.

There will be instances though where we cannot obtain individual consent (for example, if we take photos and video events open to the public). In these instances, the College will use its legitimate interest as the legal basis for collecting personal data and will provide notices in this regard.

We will take reasonable measures to comply with the rights of individuals who may not wish to be captured in photos or video.

## **Who will my personal information be shared with?**

It should be expected that published marketing materials will be publicly accessible and accessible via the internet.

Contact details used in communications with individuals and other companies/organisations represented by a contact person will be accessed only by those staff engaged in the process of communication, dealing with enquiries, statistics and reporting and management oversight.

Your personal information may be shared with authorised parties/services engaged by the College for example media/printers, or marketing email service providers.

## **How can I access my personal information?**

You have the right to access the personal information that is held about you by college.

You also have the right to ask us to correct any inaccurate personal information we hold about you, to delete personal information, or otherwise restrict our processing, or to object to processing or to receive an electronic copy of the personal information you provided to us.

**Note: These rights are not absolute and are subject to limitations and exemptions under the GDPR. Refer to the Information Commissioners Office for more information.**

## **How long is my information kept?**

We will retain marketing materials and information for the duration of the published campaign which is normally one year, covering one cycle of enrolment, application and course delivery.

For apprenticeship and other programmes, we may retain the information for 4 years.

For communications with individuals, we will retain the information for as long as there is an enquiry open, followed by 2 months before the information is anonymised. We use anonymised information for statistical purposes to help us understand the popularity of courses, and to plan/forecast future demand for courses.

## **Who can I contact if I have any queries about the information held?**

Each service point will have a manager or supervisor who can be queried.

Alternatively, you can also contact the College's Designated Data Controller via this email address [dataprotection@suffolk.ac.uk](mailto:dataprotection@suffolk.ac.uk)

## **Will my data be transferred outside of the EEA (European Economic Area)?**

The College does not in the normal course of operation transfer data outside of the EEA, although where we make use of cloud services such as Microsoft or Google, we ensure that the companies involved provide GDPR compliance contract clauses or follow equivalent standards. The College will follow government guidelines as regulations change following the end of UK membership of the EU and its impact on Data Protection regulation.

## **Will my data be subjected to automated decision-making?**

The College does not currently rely on any automated decision-making on personal data that affects learning or personnel outcomes. The result of any automatic processing of this type of data is only used to inform human decision-making.

This includes reviewing performance, absence, examinations and assessments, etc.

However, we are required to perform automated checking of certain activities for security/safeguarding and acceptable use purposes, such as internet surfing and scanning email to protect the College and its users from unsuitable or illegal content and computer malware and viruses.

In these circumstances, as speed is critical, the automated action of the security/scanning software is accepted. However, appeals can be made to IT Services to unblock websites or create exceptions if there are legitimate reasons approved by senior management.

## **What if I want to withdraw my consent?**

In the limited circumstances where the College uses your consent as the legal basis for collecting and processing data, you have the right to withdraw consent at any time. Please send an email requests/questions about consent to [dataprotection@suffolk.ac.uk](mailto:dataprotection@suffolk.ac.uk).

## **How do I complain?**

If you are unhappy with how your information has been processed, please send an email to [dataprotection@suffolk.ac.uk](mailto:dataprotection@suffolk.ac.uk). We will process the complaint in accordance with the College's internal Complaints Procedure and direct your complaint onto the College's Designated Data Controller as necessary.

You can also refer to the UK Information Commissioners Office (ICO) for guidance and information about your Personal Data Protection rights and how to exercise them by following this link: <https://ico.org.uk>