



Free2Learn Visitors and Suppliers Privacy Notice

Notice about how we use your personal information

We are the data controller of personal information about you. We are Free2Learn and our head office address is: 263 Mare Street, London, E8 3NS.

Our Data Protection Officer is Laura Watkin. If you have any questions about this policy or the ways in which we use your personal information, please contact our Data Protection Officer on 0208 525 9430 ext 3002, laura@free2learn.org.uk or at the following address: Free2Learn, Morley House, 26-30 Holborn Viaduct, London, EC1A 2AT.

This privacy notice has been prepared in accordance with the General Data Protection Regulation (EU) 2016/679 ("GDPR") and the Data Protection Act 2018.

This privacy notice concerns visitors to Free2Learn and suppliers to Free2Learn.

In each case, you have certain rights, including how to get a copy of your data, how to get it corrected or deleted, and how to complain. These rights are set out in more detail below.

Please note that on occasions we may process "special categories" of information about you. This is information revealing racial or ethnic origin, political opinions, religious or philosophical beliefs or trade union membership, and the processing of genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person's sex life or sexual orientation.

A visitor to Free2Learn

The information we collect about you and why we collect it

As part of your visit to Free2Learn we store and use your personal details (e.g. name and organisation) and information about your visit for the purposes of managing and operating Free2Learn.

We use CCTV at our buildings for the purposes of crime prevention, security and health and safety and, accordingly, will capture imagery of visitors to Free2Learn.

The legal basis on which we collect and use your personal information

Except in the circumstances highlighted below, we process this information on the basis of our legitimate interests:

- we have a legitimate interest in wishing to interact with you to manage and operate Free2Learn effectively and to ensure that Free2Learn is safe and secure for all persons visiting; and
- to be able to do so, we need to understand details of who is in the building and to be able to communicate with them.

Where we are required by law to hold certain records, then we collect and hold those records to comply with that legal obligation.

How long we keep your personal information

- CCTV footage is deleted from the system after 1 month.

- Visitor book records are kept for an indefinite period of time. If an individual requests that their personal information is deleted within a given time frame, the individual will need to put their request in writing to the Data Protection Officer.

How we share your personal information

We do not share the personal information that you give us with any organisations or third parties who provide services to Free2Learn.

How we transfer your personal information outside Europe

We do not store or transfer your personal data outside Europe.

Automated decisions we take about you

We do not make automated decisions using this information.

A supplier to Free2Learn

We store and use your information for the purposes of managing our suppliers in respect of the payment of goods and services that Free2Learn has used in the past / will use in the future & for audit purposes.

The information we collect about you and why we collect it

In order to engage and manage our suppliers, where you are a supplier (or where if it is a company, you are its representative) we collect and store your contact information and, where appropriate, your bank account details.

You may also be asked to provide details of your occupation, your CV, VAT & UTR numbers.

In addition, where you visit a building we will collect and process the information set out in the "**Visitor to Free2Learn**" section above.

The legal basis on which we collect and use your personal information

Except in the circumstances highlighted below, we process this information on the basis of our legitimate interests:

- we have a legitimate interest in engaging and managing our suppliers; and
- to be able to do so, we need to hold details of who those suppliers are.

Where we are required by law to hold certain records for health and safety purposes, then we hold those records to comply with that statutory obligation.

Where we hold your bank account details, we do so on the basis that it is necessary for us to perform our contract with you.

How long we keep your personal information

Personal and financial information is kept for audit purposes in accordance with the relevant legislative guidelines.

How we share your personal information

We may share the personal information that you give us with the following organisations (or types of organisation) for the following purposes.

- Financial information may be shared with the Free2Learn external accountant or HMRC for audit purposes

How we transfer your personal information outside Europe

We do not store or transfer your personal data outside Europe.

Automated decisions we take about you

We do not make automated decisions using this personal data.

YOUR RIGHTS

You have a number of rights over your personal information, which are:

- the right to make a complaint to the Information Commissioner's Office (ICO) if you are unhappy about the way your personal data is being used – please refer to the ICO's website for further information about this (<https://ico.org.uk/>);
- the right to ask us what personal information about you we are holding and to have access to a copy of your personal information;
- the right to ask us to correct any errors in your personal information;
- the right, in certain circumstances such as where our use of your personal information is based on your consent and we have no other legal basis to use your personal information, to ask us to delete your personal information;
- the right, in certain circumstances such as where we no longer need your personal information, to request that we restrict the use that we are making of your personal information;
- the right, in certain circumstances, to ask us to review and explain our legitimate interests to you; and
- the right, where our use of your personal information is carried out for the purposes of an agreement with us and is carried out by automated means, to ask us to provide you with a copy of your personal information in a structured, commonly-used, machine-readable format.

CHANGES TO OUR PRIVACY POLICY

We keep our privacy policy under regular review and will update it from time to time to make sure it remains up-to-date and accurate.