

## **Visitor Privacy Notice (How we use visitor information) 2025 - 2026**

This notice sets out how we use your personal information and in particular what personal information we collect and:

- what we do with your personal information;
- the lawful basis on which we collect and use your personal information;
- how long we keep your personal information;
- how we share your personal information including whether we transfer your personal information outside of the European Economic Area (“EEA”); and
- your rights over your personal information.

### **The categories of visitor information that we collect, hold and share include:**

- Personal information (such as name, address, contact details);
- Your image.

### **How is this collected?**

This information is collected directly from yourself, when you follow the onscreen instructions to register as a visitor at the College and complete the form to be issued with a Visitor’s Pass.

### **Why we collect and use this information**

We use this information:

- to issue you with a Visitor’s Pass;
- to manage who is on College premises.

You must wear a Visitor’s Pass throughout your visit. Personalised badges will be destroyed when you leave the premises.

We ask all visitors to sign in and out at Reception and show a form of ID. The ID is for verification purposes only, we don’t record this information.

Closed-circuit television (CCTV) operates outside the building for security purposes. Any images captured by our CCTV system will be destroyed after 31 days.

## The lawful basis on which we use this information

The purpose for processing this information is for security and safety reasons and in the case of using the College Wi-Fi, to provide you with access to the internet whilst visiting out site. In both instances, the lawful basis we rely on to process your Personal Data is article 6(1)(f) of the UK GDPR, which allows us to process Personal Data when its necessary for the purposes of our legitimate interests.

## How long we keep your personal information

We will only retain your Personal Data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements, and in accordance with the College's Data Retention Policy which is available at <https://www.askham-bryan.ac.uk/college-policies/> The maximum length of time we will hold any Personal Data you provide (unless for safeguarding reasons) is 12 months from the date of your visit.

## How we share your personal information including whether we transfer your personal information outside of the European Economic Area ("EEA")

We will not share your Personal Data with any third parties, unless required to do so by law.

We may be required by law to disclose certain information to the police or another relevant authority in certain circumstances e.g. where we think you or someone else is at serious risk of harm.

We may also receive requests from third parties with authority to obtain disclosure of Personal Data. We will only fulfil such requests where we are permitted to do so in accordance with applicable law or regulation.

## Your rights over your personal information

Under certain circumstances, you may have the following rights in relation to your Personal Data:

1. **The right to be informed:** A right to be told what Personal Data the College uses about you and why and how long that information will be held for before it is anonymised (or pseudonymised) or deleted or destroyed;
2. **The right of access:** A right to access Personal Data held by us about you;
3. **The right to rectification:** A right to require us to rectify any inaccurate Personal Data held by us about you;
4. **The right to erasure of your Personal Data:** A right to require us to erase Personal Data held by us about you. This right will only apply where, for example, we no longer need to use the Personal Data to achieve the purpose we collected it for, or where you withdraw your consent if we are using your Personal Data based on your consent, or where you object to the way we process your data (in line with your right to object below);

5. **The right to restrict processing:** A right to restrict our processing of Personal Data held by us about you. This right will only apply where, for example, you dispute the accuracy of the Personal Data held by us, or where you would have the right to require us to erase the Personal Data but would prefer that our processing is restricted instead, or where we no longer need to use the Personal Data to achieve the purpose we collected it for; but we require the data for the purposes of dealing with legal claims;
6. **The right to data portability:** A right to receive Personal Data, which you have provided to us, in a structured, commonly used and machine-readable format. You also have the right to require us to transfer this Personal Data to another organisation;
7. **The right to object:** A right to object to our processing of Personal Data held by us about you;
8. **The right to withdraw consent:** where we are relying on it to use your Personal Data;
9. **Automated decision making and profiling:** A right to ask us not to use information about you in a way that allows computers to make decisions about you and ask us to stop.

If you wish to exercise any of these rights, please contact the Data Protection Officer by emailing either [Judith.clapham@askham-bryan.ac.uk](mailto:Judith.clapham@askham-bryan.ac.uk) or by emailing [DataProtection@askham-bryan.ac.uk](mailto:DataProtection@askham-bryan.ac.uk)

You also have the right to lodge a formal complaint with the UK Information Commissioner's Office ("ICO") if you are unhappy with how your Personal Data is being used. Full details may be accessed on the complaints section of the ICO's website: <https://ico.org.uk/make-a-complaint/>

## WI-FI

We have Wi-Fi on site for the use of visitors. We will provide you with login details.

We record the device address and will automatically allocate you an IP address whilst on site. We log traffic information in the form of sites visited, duration and date sent/received.

## Monitoring of the College network and use of College Wi-Fi

The College uses Smoothwall and Senso to monitor computer use to safeguard staff and students.

Smoothwall is a firewall and web filter used to support digital safety and wellbeing.

Senso is a cloud-based platform for device monitoring and management. Monitoring is 24/7 and also includes use of Teams.

'Safeguarding' is a legal obligation. All organisations that work with or come into contact with children should have safeguarding policies and procedures in place to help them keep

children safe.

If you connect to the College network or Wi-Fi using your personal device, or a College-issued device, then your use of the College network and systems will be monitored, for safeguarding purposes.

The Safeguarding team will be informed of any inappropriate use and in extreme cases, such as, for instance, where child pornography is viewed, downloaded or disseminated, then the police and other appropriate authorities will be informed.

The type of data that Smoothwall and Senso collects is username, date, time, IP address (internal users only) and the site(s) visited.

Any data captured by Smoothwall and Senso will be retained for up to one year. After which, it will be deleted or otherwise destroyed.

## **Last updated**

We may need to update this privacy notice periodically so we recommend that you revisit this information from time to time. This version was last updated 1<sup>st</sup> September 2025.