



# A F F I N I T Y Education Solutions

Connecting Providers, Creating Efficiencies,  
Nurturing Development.

## Privacy Policy

<b>Approved by:</b>	Stephen Curran	<b>Date:</b>	19/03/21
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## Privacy Notice – General

Affinity Education Solutions is strongly committed to protecting personal data. This privacy notice describes why and how we collect and use personal data and provides information about individuals' rights.

Personal data is any information relating to an identified or identifiable living person. Affinity Education Solutions processes personal data for numerous purposes, and the means of collection, lawful basis of processing, use, disclosure, and retention periods for each purpose may differ.

When collecting and processing personal data, our policy is to be transparent about why and how we process personal data.

## Collection of Personal Data

### **1. From the General Public/Visitors to our website**

We collect personal data when an individual gets in touch with us with a question, complaint, comment or feedback. In these cases, the individual is in control of the personal data shared with us and we will only use the data for the purpose of responding to the communication.

### **2. From our clients**

Where we need to process personal data provided to us from our clients in order to provide our services, we ask our clients to provide the necessary information to the data subjects concerned regarding the process.

### **3. From our suppliers**

We collect and process personal data about our suppliers in order to receive services from our suppliers and, where relevant, to provide services to our clients.

## Collection of Personal Data

- To provide services to our clients
- To administer, manage and develop our services;  
We process personal data in order to run our business, including:
  - managing our relationship with clients;
    - developing our businesses and services (such as identifying client needs and improvements in service delivery);
    - maintaining and using IT systems;
    - hosting of events; and
    - administering and managing our website and systems and applications.
- **Security, quality and risk management activities**

We have security measures in place to protect our and our clients' information (including personal data), which involve detecting, investigating and resolving security threats. Personal data may be processed as part of the security monitoring that we undertake.

## The legal reasons for processing Personal Data

We process personal data in line with legislation. Article 6 of the GDPR sets out the legal bases for processing personal data. We rely on the following reasons:

- (a) Consent: the individual has given us clear consent to process their personal data for a specific purpose.
- (b) Contract: the processing is necessary for a contract we have with the member of staff.
- (c) Legal obligation: the processing is necessary for us to comply with the law (not including contractual obligations).

The legal bases for processing **Special Category Data** are set out in Article 9 of the GDPR. We rely on the following bases:

- (a) the individual has given explicit consent to the processing of those personal data for one or more specified purposes.
- (b) the processing is necessary for the purposes of carrying out the obligations and exercising specific rights of Affinity Education Solutions or of the individual in the field of employment and social security and social protection law;

## Storing Personal Data

We retain the personal data processed by us for as long as is considered necessary for the purpose for which it was collected.

Personal data may be held for longer periods where extended retention periods are required by law and/or in order to establish, exercise or defend our legal rights.

## Who we share Personal Data with

Within Affinity Education Solutions Ltd, personal data may be shared between colleagues who legitimately need the information to carry out their duties. The amount of personal data shared within Affinity Education Solutions Ltd will be no more than is reasonably necessary.

Affinity Education Solutions Ltd will not share personal data with any third parties unless the law and our policies allow us to.

## Requesting access to your Personal Data

Under Data Protection Legislation, you have the right to request access to information about you that we hold. To make a request for your personal information, contact the Affinity Education Solutions' Director responsible. Details at the end of this policy.

In certain circumstances, you also have the right to:

- object to processing of personal data that is likely to cause, or is causing, damage or distress
- prevent processing for the purpose of direct marketing
- object to decisions being taken by automated means
- in certain circumstances, have inaccurate personal data rectified, blocked, erased or destroyed; and
- claim compensation for damages caused by a breach of the Data Protection legislation.

If you have a concern about the way we are collecting or using your personal data, we ask that you raise your concern with us in the first instance. Alternatively, you can contact the Information Commissioner's Office at <https://ico.org.uk/concerns/>

## **Affinity Education Solutions' Director Responsible. Contact Information**

If you would like to discuss anything in this privacy notice, please contact Affinity Education Solutions' Director Responsible:

Stephen Curran

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