

Privacy Notice - Suppliers

1. Introduction

This notice applies to individuals who are providing goods or services to Total People Limited or employed or engaged by suppliers of goods and / or services to Total People Limited (“**you**” or “**your**”).

There is a bite-size version of this policy available at: <https://www.totalpeople.co.uk/privacy/>

2. What is the purpose of this document?

Total People Limited (company number 06380764) (“**Total People**”, “**we**”, “**our**”, “**us**”), a wholly owned subsidiary of LTE Group (a statutory corporation and an exempt charity for the purposes of the Charities Act 2011), is committed to protecting the privacy and security of your personal information. This data protection notice describes how we collect and use personal information about you in accordance with the Data Protection Act 2018 and the UK General Data Protection Regulation (the “**GDPR**”), together with other UK data protection laws.

More information can be found at: <https://www.totalpeople.co.uk/privacy/> You can also contact our Data Protection Officer at dpo@ltegroup.co.uk if you have any questions regarding this document.

For the purposes of this document, we are a "data controller". This means we are responsible for ensuring your data is handled in a secure way, and we have included in this document all of the privacy information that you should be aware of.

As a data controller we are responsible for deciding how we hold and use any personal information about you. We are required, under data protection legislation, to notify you of the information contained in this document. This notice explains what personal data we hold about you, how we share it, how long we keep it and what your legal rights are in relation to it.

3. Data protection principles

UK data protection law says that the personal information we hold about you must be:

1. Used lawfully, fairly and in a transparent way
2. Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes
3. Relevant to the purposes we have told you about and limited only to those purposes
4. Accurate and kept up to date
5. Kept only as long as necessary, for the purposes we have told you about
6. Kept securely

And that we, as the data controller, will be responsible for demonstrating our compliance with the above Principles

4. The kind of information we hold about you

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

There are **special categories** of more sensitive personal data which require a higher level of protection, such as, race, ethnicity, religious or philosophical beliefs, health, sexual orientation, etc.

The categories of personal information that we may collect, store, and use about you include:

- Contact details, e.g. name, title, address, telephone number, and personal email address
- Credit history
- Qualifications
- Accreditations
- Criminal convictions
- CCTV images

We may also process the following "**special categories**" of more sensitive personal information:

- Criminal convictions, offences or any other court proceedings

5. How is your personal information collected?

We typically collect personal information about you when we purchase goods and / or services from you. We may collect additional personal information throughout the period of you / your organisation supplying the goods and / or services to us for example via email, telephone or via our website. We may collect other additional personal information in the course of our relationship with you.

6. How will we use information about you

Some of the above grounds for processing will overlap and there may be several grounds which justify our use of your personal information. We may process your personal information without your knowledge or consent where this is required or permitted by law.

In a small number of cases where other lawful bases do not apply, we will seek your *consent* to other uses of your personal data.

In summary, we may use your personal information as follows:

Contractual obligations

To administer, or otherwise deliver, our obligations arising from any *contracts* entered into with you / your organisation, or to take steps to enter into any contracts between you / your organisation and us. To fulfil any requests you have made regarding our order(s) or to contact you with information relevant to your interaction

with us. To ascertain your ability to provide us with goods and/or services.

Audit purposes

Our lawful basis for these activities is that the processing is necessary for the performance of a task (education) carried out in the *public interest*, and in order to meet our *legal obligations*.

Complying with health and safety obligations

Our lawful basis for these activities is that they are necessary for us to comply with our *legal obligations*.

CCTV

We have CCTV in place at our Metro House site. Our legal basis is that the processing is necessary for our *legitimate interests*. These include: crime prevention, safeguarding, site security, to comply with legal obligations, and to assist in the investigation of suspected breaches of policy/procedure by staff, students or the general public.

Cameras are not monitored, unless responding to an incident identified on campus, and are kept in a secure area.

Our full CCTV Policy is available on request: dpo@ltegroup.co.uk

Information about criminal convictions

We will only use information relating to criminal convictions where the law allows us to do so. This will usually be where such processing is necessary to carry out our obligations and provided we do so in line with our Data Protection Policy.

Our lawful basis for these activities may be:

- Necessary for the performance of a *contract* to which you are a party, or in order to take steps at your request prior to entering into a contract
- Necessary for compliance with a *legal obligation*
- Necessary for the purposes of *public interests*

We have in place an appropriate policy and safeguards which we are required by law to maintain when processing such data.

7. If you fail to provide personal information

If you fail to provide certain information when requested, we may not be able to perform the contract we have entered into with you or your organisation (such as purchasing the goods and / or services from you).

8. How we use special category personal data

Special categories of personal data require higher levels of protection. We need to have further justification for collecting, storing, and using this type of data. Special category data includes racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership information, genetic, biometric, and health data, and sex life or sexual orientation data. We will process special categories of personal data in accordance with the law, and typically in the following circumstances:

- The processing is necessary for reasons of substantial *public interest*, e.g. to monitor and promote equal opportunities, to prevent dishonesty, malpractice, improper conduct and other unlawful acts, to support individuals with a particular disability or medical condition, for the safeguarding of children and individuals at risk and to comply with immigration legislation

The kinds of special category personal data we process are listed [above](#).

Do we need your consent?

We do not need your consent to process your special category personal data where we are processing it for the following purposes, as these satisfy another legal justification:

- Where we need to carry out our *legal obligations*
- Where you have already made the data public
- Where it is necessary to protect your *vital interests*, or those of another person, and where you/they are physically or legally incapable of giving consent (e.g. in an emergency situation where health, wellbeing or welfare is at risk)
- Where processing is necessary for the establishment, exercise or defence of legal claim
- Where the processing is necessary in the *public interest* for the purposes of protecting the public

In limited circumstances, we may approach you for your written consent to allow us to process certain particularly sensitive data. If we do so, we will provide you with full details of the information that we would like and the reason we need it, so that you can carefully consider whether you wish to consent.

9. Change of purpose

We will only use your personal information for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If we need to use your personal information for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal information without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

10. Automated decision-making

Automated decision-making takes place when an electronic system uses personal information to make a decision without human intervention. We are allowed to use automated decision-making in the following circumstances:

1. Where we have notified you of the decision and given you 21 days to request a reconsideration.
2. Where it is necessary to perform the *contract* with you and appropriate measures are in place to safeguard your rights.
3. In limited circumstances, with your explicit written *consent* and where appropriate measures are in place to safeguard your rights.

If we make an automated decision on the basis of any particularly sensitive personal information, we must have either your explicit written consent or it must be justified in the public interest, and we must also put in place appropriate measures to safeguard your rights.

You will not be subject to decisions that will have a significant impact on you based solely on automated decision-making, unless we have a lawful basis for doing so and we have notified you.

11. Data Sharing

We may share your personal data with third parties that are essential to complying with our *legal and contractual obligations*, such as funding and qualification bodies, external verification providers and hosted technology solution providers. This will only be undertaken as part of the administration and management of our professional courses. A full register of who we may share your personal data with and why is available on request:

dpo@ltegroup.co.uk

All our third-party partners/service providers are required to take appropriate security measures to protect your personal information in line with our policies. We do not allow our third-party partners/ service providers to use your personal data for their own purposes. We only permit them to process your personal data for specified purposes and in accordance with our instructions.

We may sometimes be obliged to disclose your personal information by law, such as by a regulator with appropriate power, or to otherwise comply with the law. Potential recipients include HM Revenue & Customs. In addition, information held by or for public bodies can be subject to freedom of information requests, however any information disclosed would not breach your privacy rights.

We will not transfer your data outside the European Union without first notifying you of our intentions and of the safeguards that apply to your data.

12. Data Security

We have measures in place to help protect the security of your information.

- Where the infrastructure is in our direct control, we have put in place appropriate security measures to help prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal information to those employees, agents, contractors and other third parties who have a legitimate need to know. They will only process your personal information on our instructions, and they are subject to a duty of confidentiality.
- We have put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach, where we are legally required to do so.

13. Data Retention

How long will you use my information for?

We will only retain your personal information for as long as is necessary to fulfil the purposes which we collected it for. Details of retention periods for your personal information are available in our **Data Retention Policy** and **Data Retention Schedule** which is available on request from dpo@ltegroup.co.uk

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and

whether we can achieve those purposes through other means, and the applicable legal requirements.

In some circumstances we may anonymise your personal information so that it can no longer be associated with you, in which case we may use such information without further notice to you.

Once we no longer require access to your personal information we will retain and securely destroy it in accordance with our data retention policy and applicable laws and regulations.

14. Your duty to inform us of changes

It is important that the personal information we hold about you is accurate and current. Please keep us informed if your personal information changes.

15. Your individual rights in connection with personal data

Under certain circumstances, by law, you have the right to:

Request access to your personal information (commonly known as a "data subject access request"). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.

Request correction of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.

Request erasure of your personal information. This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing (see below).

Please be aware that these rights are subject to certain conditions and exceptions, as set out in UK data protection law.

If you wish to invoke any of the above rights, please contact us via email: dpo@ltegroup.co.uk

No fee usually required

You will not have to pay a fee to access your personal information (or to exercise any of the other rights). However, we may charge a reasonable fee if your request for access is clearly unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances.

What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access the information (or to exercise any of your other rights). This is another appropriate security measure to ensure that personal information is not disclosed to any person who has no right to receive it.

Further guidance on your rights is available from the Information Commissioner's Office (<https://ico.org.uk/>). You have the right to complain to the Information Commissioner's Office at <https://ico.org.uk/concerns> if you have any concerns in respect of our handling of your personal information.

16. If you are unhappy with how we have handled your data

If you are unhappy with how we have handled your data, you may lodge a formal complaint with the following department:

The Company Secretary & General Counsel
Executive Suite
LTE Group
Ashton Old Road
Manchester
M11 2WH

dpo@ltegroup.co.uk

If you do not wish to discuss this with us, or you are unhappy with our response, you also have the right to lodge a complaint with a supervisory authority, the Information Commissioner's Office (ICO). This can be done through live chat on the ICO website, or via the telephone:

www.ico.org.uk/livechat

0303 123 1113

More information on the ICO's complaint procedure can be accessed at:

<https://ico.org.uk/make-a-complaint/>

17. Changes to this document

We reserve the right to update this document at any time, for example if the law or regulatory requirements change, if technology changes or to make LTE's operations and procedures more efficient, and we will provide you with a new privacy notice when we make any substantial updates. We may also notify you in other ways from time to time about the processing of your personal information.