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**Keats Engineering and Education Ltd in partnership with Pontefract Collieries  
FC: Data Protection, GDPR and Retention Policy**

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Policy	006	01.09.24	03.09.25	T.Wiles

### **Positional Statement**

Keats Engineering and Education Ltd in partnership with Pontefract Collieries FC accept and appreciate that they have a degree of trust and responsibility. To provide you with the best possible education and training services, Keats Engineering and Education Ltd in partnership with Pontefract Collieries FC must process and use the data you share/provide. The security of your data is of the utmost importance to, and this Policy will highlight just how your personal data is collected, used, and protected.

It is important that you understand your rights with regards to the use of your personal data and as such, your individual rights (and how to exercise them) will be explained within this document.

### **Objectives**

The purpose of this policy is to provide full transparency with regards to how Keats Engineering and Education Ltd in partnership with Pontefract Collieries FC collect, use, and store your personal information/ data. Aligning with the provisions of the GDPR, this policy applies to all staff, learners, and volunteers.

Keats Engineering and Education Ltd in partnership with Pontefract Collieries FC is committed to protecting the rights of individuals when collecting, processing, and protecting their data. Given the complexities of the business undertaken by Keats Engineering and Education Ltd in partnership with Pontefract Collieries FC, there is a wide range of personal data that is collected, processed and stored such as; learner name and address details, financial transactions, sensitive information relating to learner care plans (applicable only for those with severe SEND requirements) and sensitive information relating to racial or ethnic origin, political opinions, religious beliefs, trade union activities, physical or mental health or sexual life.

### **Background**

Keats Engineering and Education Ltd in partnership with Pontefract Collieries FC is required to adhere to the six principles of data protection (outlined in the GDPR) which means that information must be collected and processed fairly, stored safely (protected) and not unlawfully disclosed to other persons or third parties.

### The six principles are:

- Personal data shall be processed lawfully, fairly and in a transparent manner ('lawfulness, fairness and transparency')
- Personal data shall be collected for specified, explicit and legitimate purposes and not further processed in any manner incompatible with those purposes. Further processing for archiving, scientific or historical research or statistical purposes is permissible ('purpose limitation')
- Personal data shall be adequate, relevant, and limited to what is necessary in relation to the purpose for which it is processed ('data minimisation')
- Personal data shall be accurate and where necessary kept up to date ('accuracy')
- Personal data processed for any purpose shall not be kept for longer than is necessary for that purpose ('storage limitation')
- Personal data shall be processed in a manner that ensures appropriate security including protection against unauthorised or unlawful processing and against accidental loss, destruction, or damage, using appropriate technical or organisational measures ('integrity and confidentiality').

### Personal Data

Personal data is information about a living individual, who is identifiable from that information or who could be identified from that information when combined with other data which the Company either holds or is likely to obtain. GDPR also refers separately to 'special categories' of personal data which includes particularly sensitive personal information such as health details, racial or ethnic origin or religious beliefs.

### About Us

Keats Engineering and Education Ltd in partnership with Pontefract Collieries FC who are a registered CIC provide education and training services, including training courses, community initiatives, further education, and courses for individuals with SEND requirements. We are also an Alternative/Specialised Provision for High School and College aged children who struggle with mainstream education.

## GDPR Policy

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Keats Engineering and Education Ltd in partnership with Pontefract Collieries FC acts as the data controller and as such, determines what data is collected, how your data is going to be used and how your data will be protected.

### Collection and Use of Personal Data

The collection of your data is done so legally and ethically for a specific purpose (see lawful basis for processing).

We collect your personal data for one or more of the following reasons:

- To manage and maintain communications between Keats Engineering and Education Ltd in partnership with Pontefract Collieries FC and you
- To initiate commercial communications with you or the organisation that you represent, where it is believed that the services offered by Keats Engineering and Education Ltd in partnership with Pontefract Collieries FC would be of use and benefit to the organisation that you represent
- To complete contractual obligations such as those relating to your chosen course.

### Our Lawful Basis for Processing

In accordance with Article 6 of the General Data Protection Regulations (GDPR), Keats Engineering and Education Ltd in partnership with Pontefract Collieries FC must have a legal basis / reason for processing your information. As outlined in this Policy, Keats Engineering and Education Ltd in partnership with Pontefract Collieries FC's lawful basis for processing your information is that of **Consent**. This means that your personal information is only processed / used for a specific purpose (outlined above), of which Keats Engineering and Education Ltd in partnership with Pontefract Collieries FC must first obtain your clear consent to do so.

Note, you have the right to object to Keats Engineering and Education Ltd in partnership with Pontefract Collieries FC using or processing your personal data at any time, and that you can exercise your right to 'erasure'.

This means that upon your request, Keats Engineering and Education Ltd in partnership with Pontefract Collieries FC will take reasonable steps to ensure that your personal data is securely disposed of/deleted.

### **Storage and Sharing Your Data**

In accordance with Article 5 (e) of the GDPR, Keats Engineering and Education Ltd in partnership with Pontefract Collieries FC will **NOT** store / keep your personal data for longer than is necessary. These limits established by the data controller, are set to either a) immediately after your request to erase (as outlined in section 4) or b) 12 months after you and Keats Engineering and Education Ltd in partnership with Pontefract Collieries FC have ceased to do business, if no prior objection or request to erasure have been made.

All Keats Engineering and Education Ltd in partnership with Pontefract Collieries FC customer relationship management, accounting and banking systems are all UK/EU based and unless explicitly stated, Keats Engineering and Education Ltd in partnership with Pontefract Collieries FC remain the data controller for all data collected and processed for any of the aforementioned processes.

Keats Engineering and Education Ltd in partnership with Pontefract Collieries FC will never sell or disclose your personal data. Any information that is passed on to third parties is only done so for professional/business purposes, and only ever with your full consent and/or request.

### **Security Measures**

Keats Engineering and Education Ltd in partnership with Pontefract Collieries FC ensures that its computer software and system security are reviewed. In addition to this, Keats Engineering and Education Ltd in partnership with Pontefract Collieries FC provides staff with adequate cyber awareness and cyber security training, to mitigate against basic human error.

It is pertinent to note however, that Keats Engineering and Education Ltd in partnership with Pontefract Collieries FC cannot be responsible/liable for breaches that occur beyond that of our control. This means that you should take extra care to ensure your own data protection with regards to your own devices, web browsing and any external factors whereby your personal data could be considered at risk.

## Your rights

You have certain rights regarding your personal data and it is important that you understand what these rights are. Should you wish to exercise any of your rights (detailed below) then please contact the Director of Education Tom Wiles via email: [t.wiles@keatsee.com](mailto:t.wiles@keatsee.com)

### Your Rights:

#### 1. Your right to be informed.

As the data controller, Keats Engineering and Education Ltd in partnership with Pontefract Collieries FC has a legal and ethical obligation to inform you in a clear and transparent manner, how your data will be processed. You can find this here in our privacy policy, of which additional copies can be made available to you upon request.

#### 2. Your right of access.

You have the right to request (and be provided with) a copy of the data/information that Keats Engineering and Education Ltd in partnership with Pontefract Collieries FC holds about you and confirmation of how that data has been processed.

#### 3. Your right to restrict.

There are various reasons why you may exercise your right to restrict. If you exercise this right, Keats Engineering and Education Ltd in partnership with Pontefract Collieries FC will still hold your data, but will not under any circumstances continue to process it.

#### 4. Your right to rectification.

You have the right to rectify any personal data that is held, if you believe it to be incorrect or incomplete. You can also request your right to restrict simultaneously, to ensure your data is correct before processing continues.

**5. Your right to erasure.**

As previously mentioned, you have the right to request processing to stop and your personal data to be securely disposed of / deleted.

**6. Your right to object.**

You have the right to object to Keats Engineering and Education Ltd in partnership with Pontefract Collieries FC processing your personal data. You can also follow this with the right to erasure.

**Policy Reviews**

This Policy will be renewed annually.

For further information or to discuss any concerns regarding this, or any of our other Policies and Procedures, please contact: [t.wiles@keatsee.com](mailto:t.wiles@keatsee.com)