

Privacy Notice for Online Visitor and Staff Sign-in system

West Lothian College is providing you with this information to comply with data protection law and to ensure that you are fully informed and we are transparent in how we collect and use your personal data.

Who is collecting the information?

West Lothian College is the Data Controller. We have an appointed Data Protection Officer (DPO) who can be contacted by emailing: GDPR@west-lothian.ac.uk

Why are we collecting it and what are we doing with it (Purpose)?

We use this information to:

- Maintain a record of visitors and staff on site for safety and security
- Meet health and safety obligations, including fire evacuation procedures
- Safeguard staff, students, and visitors
- Investigate incidents or emergencies if required
- Communicate with visitors and contractors
- Manage parking resources, and in case of emergencies, to identify vehicles on the premises.

What personal data do we collect?

During the check-in process we collect the following information.

- Your name
- Company Name (if applicable)
- Contact details (email address)
- Time and date of your visit
- Person or department you are visiting
- Vehicle registration (if provided)
- A photograph of you for security purpose

The lawful basis for the processing?

The lawful basis we rely on under UK General Data Protection Regulation (UK GDPR) are:

- Article 6(1)(c): processing is necessary for compliance with a legal obligation (health and safety, safeguarding, fire safety).
- Article 6(1)(f): processing is necessary for our legitimate interests (site security and managing access to college premises).
- Article 6(1)(d): processing is necessary in order to protect the vital interests [of you or someone else] (liaising with emergency services in the event of an incident).

Special category (sensitive) data is not collected. However, a photograph can infer special category data. Where this is the case, the lawful basis for processing is:

- Article 9(2)(g): processing is necessary for substantial public interest; and Data Protection Act 2018, Schedule 1, Part 2, 6. Statutory etc and government purposes and 10. Preventing or detecting unlawful acts.

Where you have agreed to receive marketing communications from us, such as newsletters, updates, or other relevant communications, our lawful basis is Article 6(1)(a): consent. You can withdraw your consent at anytime.

Who we share the information with:

Your information may be shared with:

- Emergency services in the event of an incident
- Regulatory bodies where legally required
- Our system provider (Custr), who acts as our data processor under a contract.

How long do we hold the personal data?

Visitor and staff sign-in records are retained for **12 months**, after which they are securely deleted, unless required longer for investigation or legal purposes.

Individuals' rights in relation to this processing

Under data protection law, individuals have a number of rights. The rights that apply for this processing are:

- Right to be Informed – i.e. this privacy notice
- Right of Access – you can request access or copies of your personal data
- Right to Rectification – you have the right to correct inaccurate or incomplete data held about you
- Right to Erasure – you have the right to request your personal data held is deleted/destroyed.
- Right to Restrict – you have the right to restrict processing of your data, this links with other rights and if there is disagreement then you can request the processing is restricted until the issue is resolved.
- Right to Object – this means you can object to how your data is processed.

To exercise any of your rights please email the data protection mailbox at GDPR@west-lothian.ac.uk

Complaints to UK Information Commissioner's Office (ICO)

If you are concerned about how your personal data is being used by the College, in the first instance please contact the DPO at GDPR@west-lothian.ac.uk . If you are not satisfied with the outcome then you can complain to the regulator of data protection, the UK Information Commissioner's Office (ICO) through their website: <https://ico.org.uk/make-a-complaint/data-protection-complaints/>

You can also call them on 0303-123-113 or write to them at the following address:

Customer Contact
Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
SK9 5AF