



PETERBOROUGH KEYS
ACADEMIES TRUST

PRIVACY NOTICE – GUEST WIFI

Version 1.1

September 2024

Trustee Committee: Finance, Audit and Risk Committee

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Date of Next Review: July 2026

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1. Introduction

- 1.1** This Privacy Notice for Guest WiFi Users explains how and why we store personal information about those who access our Guest WiFi. It provides a guide to our legal obligations and their own rights. Like any organisation which handles personal data, our school is the 'Data Controller' as such, we are registered with the ICO (Information Commissioner's Office) and we comply with UK General Data Protection Regulation (UK GDPR). Our ICO registration number is ZA347488

2. The Categories of Guest WiFi User Information That We Process Include:

- 2.1 We process the following personal information from Guest WiFi Users - [add / delete categories as applicable based on the information you collect from Guest WiFi Users]

3. Why We Collect and Use Guest WiFi User Information

- 3.1 Under the UK General Data Protection Regulation (UK GDPR), the legal basis we rely on for processing personal information for these purposes are:
- (a) (6b) Performance of a Contract: the processing is necessary for the performance of a contract to which the data subject is party.
- 3.2 The lawful bases for processing personal data are set out in Article 6 of the UK General Data Protection Regulation.

4. Storing Guest WiFi User Information

- 4.1 We hold data securely for the set amount of time shown in our data retention schedule. For more information on our data retention schedule and how we keep your data safe, please see our Data Protection Policy and our Records Management on our website.

5. Who We share Guest WiFi User Information With

- 5.1 We share Guest WiFi User information with our guest WiFi and network provider in order to perform the service of providing the guest WiFi. We do not share Guest WiFi User information with any other third parties unless we are legally required to do so.

6. Requesting Access to Your Personal Data

6.1 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 gdpr@pkat.co.uk or our Data Protection Officer, SchoolPro TLC Ltd at DPO@schoolpro.uk.

6.2 Depending on the lawful basis used for processing data (as identified above), you may also have the right to:

- (a) have your personal data rectified if it is inaccurate or incomplete;
- (b) request the deletion or removal of personal data where there is no compelling reason for its continued processing;
- (c) restrict our processing of your personal data (i.e. permitting its storage but no further processing);
- (d) object to direct marketing (including profiling) and processing for the purposes of scientific/historical research and statistics; or
- (e) not be subject to decisions based purely on automated processing where it produces a legal or similarly significant effect on you.

6.3 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 our Data Protection Officer which is SchoolPro TLC Ltd via DPO@schoolpro.uk. You can also contact the Information Commissioner's Office at <https://ico.org.uk/concerns/>

7. Contact

7.1 If you would like to discuss anything in this privacy notice, please contact: gdpr@pkat.co.uk or our Data Protection Officer, SchoolPro TLC Ltd at DPO@schoolpro.uk.

8. Version History

8.1 Table of Versions

VERSION	ACTION	RESPONSIBLE	DATE
1.0	Privacy notice updated with new DPO introduction	Jordan SMITHSON	29/06/2023

1.1	Review in line with policy schedule	DPO	01/06/2024