Pathway Trust

Privacy Notice (Supplier Contacts)

Policy effective from	1 September 2026
Policy owner	Head of Governance
Policy applies to	Berrow Church Primary School Burnham-on-Sea Infant School Castle Batch Primary School Charfield Primary School Cherry Garden Primary School Downend School East Huntspill Primary School Lyde Green Primary School Mangotsfield School Marlwood School Pawlett Primary School Priory Community School Severn Beach Primary School St Andrew's Church Junior School St Anne's Church Primary School The Castle School The King Alfred School Tortworth Primary School West Huntspill Primary School Worle Community School Pathway Partnership Teams
Policy changes since last version	New policy

1. Privacy Notice (How We Use Supplier Contact Information)

1.1 This Privacy Notice explains how and why Pathway Trust collects, uses, and protects the personal information of our supplier contacts. It provides a guide to our legal obligations and your rights. Like any organisation which handles personal data, our trust 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).

2. The Categories of Data We May Collect About our Supplier Contacts:

Identification Information	Name, gender, vehicle registration number, copy of identification documents
Contact Information	Email address, telephone number, postal address
Your Role	Job titles, areas of responsibility, name of employer
Images	CCTV or vehicle camera footage, photographs, video call recordings
Financial and payment Information	Bank account details
Certifications or Membership Numbers	Accreditation to industry standards or membership trade associations
Other Information we made hold	Personal data that is available publicly, such as employment history, directorships or company house information Any other personal data you choose to share with us (such as allergies or dietary requirements).

3. Why We Collect and Use This Information

3.1 We use supplier contact data:

- To establish, manage, and maintain our contractual relationship, including but not limited to communication, order processing, invoicing, and payments.

3.2 Under Article 6 the UK General Data Protection Regulation (UK GDPR), the legal basis we rely on for processing personal information for general purposes is:

6(b) Performance of Contract: Your organisation and the trust are parties to the contract.

4. How we keep Supplier Contact Information Secure

4.1 We have implemented appropriate technical and organisational measures to ensure the security of your personal data against unauthorised or unlawful processing, accidental loss, destruction, or damage.

5. Storing Supplier Contact Information

5.1 We hold data securely for the set amount of time shown in our Records Retention Policy.

6. Who and Why We Share Supplier Contact Information With

6.1 We may share your personal data with constituent schools and internal departments within the trust and third-party service providers who assist in fulfilling our contractual obligations. All third parties are required to take appropriate security measures to protect your personal data.

7. Requesting Access to Your Personal Data

7.1 The UK-GDPR gives you certain rights about how your information is collected and used. To make a request for your personal information, contact **dataprotection@pathwaytrust.uk.**

7.2 You also have the following qualified rights:

- The right to be informed about the collection and use of your personal data – this is called 'right to be informed'.
- The right to ask us for copies of personal information we have about you – this is called 'right of access', this is also known as a subject access request, data subject access request or right of access request.
- The right to ask us to change any information you think is not accurate or complete – this is called 'right to rectification'.
- The right to ask us to delete your personal information – this is called 'right to erasure'
- The right to ask us to stop using your information – this is called 'right to restriction of processing'.
- The 'right to object to processing' of your information, in certain circumstances
- Rights in relation to automated decision making and profiling.
- The right to withdraw consent at any time (where relevant).
- The right to complain to the Information Commissioner if you feel we have not used your information in the right way.
- There are legitimate reasons why we may refuse your information rights request, which depends on why we are processing it. For example, some rights will not apply:
- Right to erasure does not apply when the lawful basis for processing is legal obligation or public task.
- Right to portability does not apply when the lawful basis for processing is legal obligation, vital interests, public task or legitimate interests.
- Right to object does not apply when the lawful basis for processing is contract, legal obligation or vital interests. And if the lawful basis is consent, you don't have the right to object, but you have the right to withdraw consent.

7.3 If you have a concern about the way we are collecting or using your personal data, you should raise your concern with us in the first instance or directly to the Information Commissioner's Office to raise a concern with ICO. Alternatively, you can contact our Data Protection Officer which is SchoolPro TLC Ltd via DPO@schoolpro.uk.

8. Right to Lodge a Complaint

8.1 Under Section 164A of the Data Protection Act 2018, you have a statutory right to complain if you believe your personal data has been handled inappropriately.

8.2 If you wish to raise a concern about how we process your personal data, please contact us directly at dataprotection@pathwaytrust.uk. We will acknowledge your complaint within 30 days of receipt and take appropriate steps to investigate and respond without undue delay.

8.3 If you are not satisfied with our response, you may escalate your complaint to the Information Commission at: Information Commissioner's Office.

9. Last Updated

9.1 We may need to update this privacy notice periodically, so we recommend that you revisit this information from time to time. This version was last updated on 1 September 2026**.**

10. Contact

10.1 If you would like to discuss anything in this privacy notice, please contact: dataprotection@pathwaytrust.uk