

## Privacy Notice – Single Central Record Ltd

This privacy notice describes the processing of personal data we undertake as a business.

The following are our reasons for collecting your personal data, what we do with it and what your rights are under UK GDPR.

### Who are we?

We are Single Central Record Ltd, a company registered in England, registration number: [10926999](#), registered office address Unit 5, The Courtyard, Old Court House Road, Bromborough, Wirral, CH62 4UE.

You can contact us by calling (+44) 0151 606 5101, or emailing [oscr@onlinescr.co.uk](mailto:oscr@onlinescr.co.uk).

You can also contact us at our main office location: 46 Seaview Road, Wallasey, Merseyside, CH45 4LA.

We are registered as a Data Controller with the Information Commissioner's Office (ICO – the UK's regulator for data protection), registration number [ZA327585](#).

This privacy notice describes our processing activities where we act as the data controller, for example when we engage with you as an operational contact at one of our clients or suppliers.

**Where we are providing our online Single Central Record portal we do so as a data processor acting on behalf of our client, you should contact them directly if you wish to know more about their processing of your personal data.**

Where we are acting as your organisation's data processor you will find our processing activities described within our Data Processing Addendum, available at <https://portal.onlinescr.co.uk/policies>.

We have appointed a Data Protection Officer, who can be contacted at the above address, or by emailing [dpo@onlinescr.co.uk](mailto:dpo@onlinescr.co.uk).

## Why we process your data, what data we process and how long we keep it for

We process your personal data for a variety of purposes. The table below sets out

- The categories of personal data we process
- The purpose for processing the personal data
- Our lawful bases under UK data protection legislation (UK GDPR) for processing the data
- The maximum retention period

Where we are providing services to you then we will be unable to do so if you don't provide your data to us.

Purpose	Categories of Data Processed	Lawful Basis under UK GDPR	Maximum Retention Period
Managing your general commercial and support enquiries	Name, organisation, roles, contact details.  If you are an individual acting on your own behalf, a sole trader or a partner in a partnership then all of the information relating to your enquiry will also form part of your personal data.	Our legitimate interests in responding to and managing your enquiry.	7 years
Managing our commercial and service relationship with your organisation as one of our clients if you are a member of their staff, including the provision and use of our online portals	Name, organisation, role, contact details, account credentials.  If you are a sole trader or partner in a partnership then all of the information relating to our relationship with you including financial information, invoices, payments etc will also form part of your personal data.	Our legitimate interests in managing our relationships and any associated contracts between us and your organisation.  If you are a sole trader or partner in a partnership then our lawful basis will be that processing is necessary to manage the contract we have with you	7 years

Managing our commercial relationship with you as a contact employed by one of our suppliers or partner organisations (including official bodies such as the DBS)	Name, role, contact details, and contact history  If you are a sole trader or partner in a partnership then all of the information relating to our relationship with you including financial information, invoices, payments etc will also form part of your personal data.	Our legitimate interests in managing our commercial relationships and any associated contracts between our respective organisations  If you are a sole trader or partner in a partnership then our lawful basis will be that processing is necessary to manage the contract we have with you	7 years
Maintaining our organisational security	Online identifiers (e.g. IP addresses), activity, visitor records.	Our legitimate interests in maintaining our organisational security	3 years
Direct marketing	Name, contact details, marketing preferences	Our legitimate interests in ensuring we appropriately manage, deliver or suppress direct marketing activity	2 years
Recruitment Enquiries	Name, contact details, role applied for	Taking the steps necessary to enter into a contract with you. We will provide further privacy information to you as the recruitment process progresses.	3 months if application unsuccessful
Deployment of non-essential cookies	Consent preferences	Your consent	1 year
Data sharing with our sister companies who provide support to us (e.g. shared	Name, role, contact details, and contact history.	Our legitimate interests in managing our businesses efficiently	As per above retention periods

operational support services such as IT, finance etc.)	If you are an individual acting on your own behalf, a sole trader or a partner in a partnership then all of the information relating to your relationship with us (as detailed in the above purposes) will also form part of your personal data.		
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Where we are relying on our legitimate interests to process your data then we will keep your personal data until you object to our legitimate interests and we agree with your objection, or until the above default periods have elapsed after our last contact with you. In the case of direct marketing activities we will ensure that we cease to market our services to you should you object to our legitimate interests.

Where we are relying on your consent you are free to change your mind and withdraw your consent at any time.

Where we are processing payments via our online payments processor we do not have access to your payment card details.

## Special category & criminal offence data

There are additional rules we must follow if we collect certain types of more sensitive data, known as Special Category Data. These include details of your ethnicity, beliefs, health and sexuality and also information relating to criminal convictions and offences in each case we must let you know what our additional lawful basis is for processing such data.

We do not routinely process special category or criminal offence data as a data controller. Where we provide our Single Central Record system, DBS check services or social media check services, we do so as a data processor acting on behalf of our client schools and trusts. In that capacity we handle criminal offence data as described in Article 10 of the UK GDPR on behalf of our clients, who are the data controllers for that processing. If you have questions about that processing, please contact your school or trust directly.

## Do we ever share personal data?

We will share your data if we receive a legitimate request from a law enforcement agency.

When you submit your personal data online your data is shared with our partners who manage and host our websites.

If we are communicating with you via email or social media channels, we will be sharing your personal data with those email and social media providers.

We also utilise external suppliers to provide several business supports services. We always ensure that we have appropriate contracts in place to protect your rights when personal data are processed on our behalf by these third parties. There is further information regarding these suppliers in the “Where Do We Process Data?” section.

## How do we keep your data secure?

We take sensible steps to keep your data secure and ensure we can uphold your rights and meet our obligations under UK GDPR:

- All data sent between your browser and our website are encrypted in transit,
- Access to personal data is role based: only those members of staff with a legitimate need will have access,
- We ensure that appropriate contracts are in place with our suppliers who process your personal data to protect your rights, to ensure that they take appropriate security measures to safeguard your data, and that any international transfers are done correctly under UK GDPR,
- Our employees are all subject to an obligation of confidentiality, and receive training on data protection matters,
- We utilise appropriate technical and organisational measures to optimise the security of your personal data.
- We hold Cyber Essentials, Cyber Essentials Plus and ISO 27001 certification.

## Your Rights

You have a number of rights relating to the processing of your data, if you would like to use them or have any questions then please contact us.

- We won't charge you for doing any of the following, however we may make a charge in the case of frequent repeat or unfounded requests,
- Awareness: You have the right to be fully informed about why and how we process your information. This privacy notice is intended to meet that requirement, but please do contact us if you have any questions. If we obtain your personal data from a third party (e.g. a social media platform or recruitment platform) then we will tell you where we have obtained your information from,
- Access: You have the right to a copy of the data we hold about you,
- Rectification: If you think some of the data we hold is wrong then you have the right to ask us to correct it,

- Erasure: You have the right to ask us to delete the data we hold about you. Where we are holding the data to fulfil a contract with you or your organisation then we will need to retain the data in accordance with the data retention requirements shown above,
- Restriction: You have the right to ask us to restrict the processing of personal data whilst we check its accuracy, if you think the processing is unlawful, if you believe we no longer need to process the data but you need us to store it due to pending legal claims, or when you object to our processing based upon our legitimate interests and we are assessing the validity of that,
- Object: Where we are processing your personal data based upon our legitimate interests you have the right to object to that. If your objection is valid (for instance in the case of any direct marketing activity) then we will stop processing your personal data for that purpose,
- Data portability: You can request a copy of your data in a digital format which you can then supply to another provider when we are processing your personal data under the lawful basis of performing a contract with you or because we have your consent,
- Automated decisions and profiling: You have the right, in certain circumstances, not to be subject to decisions based on automated processing (including profiling) if it has a significant or legal impact on you. This doesn't apply if the processing is necessary to fulfil a contract with you, or if you have given us your consent to do so. We do not currently use any technology to make automated decisions about you.

## Cookies – How do we use cookies on our websites

We utilise cookies on our website. Some are required for our site to work, these are known as essential cookies, and we also use others for analytics and marketing purposes.

We will ask for your consent to use any cookies which aren't essential, and we won't deploy any non-essential cookies without your consent. You should be aware that whilst we use non-essential cookies to help us understand how our website is performing, the author of the cookies (e.g. Google) may use the data obtained for their own purposes.

These are the non-essential cookies we use:

Name	Type	Provider
_ga	Analytics	Google Analytics
_gid	Analytics	Google Analytics
_gat	Performance/Analytics	Google Analytics

## What happens when I follow links to other sites?

If you follow a link from our site to another site then you should read the privacy notice on the other site prior to providing your data to them. We are not responsible for the cookies installed upon your device by other websites.

## Where do we process data?

We primarily process data in the UK however we use partners to help us deliver our services, some of these services will mean that your personal data are transferred outside of the UK.

Partner	Where are they located?	What additional protections are in place to safeguard your rights if processing is transferred overseas
Access Personal Checking Services Ltd (DBS checking services)	UK	N/A
Mailgun Technologies, Inc (email service)	USA	Certified with EU – US privacy framework + UK extension to EU – US privacy framework
Microsoft Ltd (office productivity tools)	UK	N/A
Neotas Ltd	3rd Floor, 86-90 Paul Street, London, UK, EC2A 4NE	N/A
Vigo IT Solutions Ltd (IT support)	UK	N/A

We may share your personal data with professional advisors from time to time, such as our accountants or legal advisors. We will always ensure that appropriate protections to your rights and freedoms are in place.

## Making a complaint

You have the right to complain about data protection matters.

We will:

- Acknowledge the complaint within 30 days beginning the day after the complaint is received,
- Make enquires into the subject matter of the complaint,
- Inform you about the progress of the complaint,
- Respond within a reasonable amount of time.

Please contact us at the above address. You also have the right to lodge a complaint with the Information Commissioner's Office (ICO) on their helpline 0303 123 1113 or online at [www.ico.org.uk](http://www.ico.org.uk), although they will normally ask you to contact us first.