



## Privacy Notice – Using Biometrics

We respect the privacy of you and your child when you use our services and are committed to complying with privacy legislation. This privacy notice is to be read in conjunction with the overall privacy statement held under [www.gepacademies.com/dataprivacy](http://www.gepacademies.com/dataprivacy).

What is the service being provided?	<b>Using biometric recognition at customer service points:</b> For example, for cashless catering							
What personal data do we need from you?	• Biometric data (fingerprint or thumb-print)							
Who will be using your Personal Data?	Who is the Data Controller?	GEP Academies Staff, governors/trustees in schools/business units across GEP Academies.						
	How can you contact the Data Protection Officer?	DPO@gepacademies.com						
	Are there any Data Processors?	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>			
What will it be used for and what gives us the right to ask for it and use it?	The Purpose(s):	To provide efficient customer services on-site						
	The Lawful Basis:	Consent (You may withdraw your consent at any time by contacting us)						
Who else might we share your data with?	Not applicable							
Will your data be stored in or accessible from countries with no UK-equivalent Privacy Law protections?	No							
How long will your data be kept?	When after user will this data be deleted?	See Data Retention Procedure						
Our use of the data will be subject to your legal rights (marked if applicable):	Inform	<input checked="" type="checkbox"/>	Access	<input checked="" type="checkbox"/>	Rectify	<input checked="" type="checkbox"/>	Erase	<input checked="" type="checkbox"/>
	Restrict	<input checked="" type="checkbox"/>	Portable	<input type="checkbox"/>	Object	<input checked="" type="checkbox"/>	Automate	<input type="checkbox"/>
As you are giving us your data directly to us:	This is the reason why we are allowed to ask for it and use it:	To enable the delivery of customer services efficiently.						
	This is what could happen if you refused to let us use your data for this purpose:	Not giving/withdrawing consent means you, will not use the biometric recognition system to identify yourself at a customer service point, e.g. to a member of catering staff. Alternative arrangements can be made: name and photo identification.						
<b>Visit the following links for more information about Privacy Law, our obligations and your Rights:</b>								
<a href="#">The ICO Guide to the General Data Protection Regulations 2016</a> <a href="#">The General Data Protection Regulations 2016</a>								
<b>If you have concerns over the way we are asking for or using your personal data, please raise the matter with our Data Protection Officer by the following means:</b>								
Email	<a href="mailto:DPO@gepacademies.com">DPO@gepacademies.com</a>							
<b>If you still have concerns following our response you have the right to raise the matter with the Information Commissioner's Office:</b>								
Postal Address	Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF							
Online Form	<a href="https://ico.org.uk/concerns/handling/">https://ico.org.uk/concerns/handling/</a>							
Phone Number	0303 123 1113							

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## Version Control

Date	Version	Updated By	Comments
23/05/18	1.0	COO	GDPR/DPA2018 Compliance; effective 25/05/18