

# **Finance Privacy Notice**



## **Introduction**

As a Data Controller, South West College (“the College”) values the relationships with all our students, staff and stakeholders and recognises and respects the importance of protecting the privacy of your personal data. The College will process all personal data in compliance with GDPR and the Data Protection Act 2018 for the purpose of providing you with a service you have requested and to meet our statutory obligations.

We will never ask for information that is unnecessary to deliver this service. SWC is the Data Controller registered with the Information Commissioner Office (ICO) and is responsible under the Data Protection Act 2018 for the personal data that you submit to us.

This Privacy Notice explains how we hold, and use, any personal information we collect about you in your interactions with SWC’s Finance Department. If we make changes to this notice, we will notify you by updating it on our website.

The College Data Protection Officer is Nicola Nugent.

The College’s registration reference number with ICO is Z1124639.

## **What personal information do we collect?**

We may collect, store and use the following categories of personal information:

- Full name
- Address
- Contact numbers
- Email Address
- National Insurance Number
- Marital Status
- Bank account details, including Bank Name and Address, Sort code and Account Number
- Tax Code Records
- Salary, pension and payroll deduction information

- Enforcements of Judgement/Statutory Deductions
- Location of employment and workplace
- Identification documents (including copy passports)
- Employment records – job titles, work history, working hours
- Remuneration History
- Card Payment Details (name of cardholder, card number, expiry date, security code)
- VAT Registration numbers
- Disability Registration Status
- Residency Status
- Qualifications
- Previous Funding Sources
- Evidence of personal income
- Dependent information (names of children, dates of birth, copy birth certificates)
- Information regarding relationship with parents
- Evidence of income of parent, spouse, partner
- Personal contact information of parent, spouse, partner
- Tax Credit Information
- Car Registrations

We may also collect, store and use the following **Special Category Data**:

- Trade Union Membership
- Medical Evidence (doctors letters, photographs, and medical notes).

### **How do we use your information?**

Data Protection says that we are allowed to use and share your personal data only where we have a proper reason to do so. The law says we must have one or more of these reasons and these are (for SWC as a public authority):

- **Contract** – your personal information is processed in order to fulfil a contractual arrangement e.g. in order to make payment for your tuition fees or to make payment to staff members.
- **Consent** – where you agree to us using your information in this.
- **Public interest** – processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the

controller.

- **Legal Obligation** – where there is statutory or other legal requirement to share the information e.g. when we have to share your information for law enforcement purposes.
- **Vital Interests** – where processing is necessary to protect the vital interests of the data subject or of another natural person.

Here is a list of the ways that we may use your personal information, and which of the reasons described above we rely on to do so.

What we use your personal information for	Our reasons (legal basis)
Workforce remuneration and payment of salaries & expenses/pensions administration	Fulfilling a contract Legal Obligation
Processing and payment of supplier invoices.	Fulfilling a contract
Processing and recovery of accounts and fees.	Fulfilling a contract
Processing Student Finance Funding Claims (e.g. Hardship Fund, Care to Learn)	Fulfilling a contract
Processing VAT Returns to HMRC.	Legal obligation
Participation in National Fraud Initiative	Legal obligation

### **Processing Special Category Data**

We will use special category data in the following ways:

What we use your personal special category data for	Our reasons (legal basis)
Processing tuition fee refunds and waivers.	Fulfilling a contract
Payment of trade union premiums	Fulfilling a contract

### **Who we share your information with and why Payment processing providers**

SWC works with trusted third party payment processing providers in order to securely take and manage payments.

SWC works with banks and trusted third party payment processing providers in order to

make payments to staff and suppliers.

### **Credit Check Agencies**

Before we provide services, we may undertake checks for the purposes of making decisions on level of credit being provided to customers. These checks require us to process personal data about you.

The personal data you have provided or we have collected from you will be used to undertake various credit checks. Details of the personal information that will be processed include, for example: name, address, date of birth, contact details, financial information, and employment details.

### **Debt Collection and Tracing Agencies**

In order to recover outstanding accounts, we may share your information with Debt Collection and Tracing Agencies.

The personal data you have provided or we have collected from you will be used to undertake debt collection and tracing. Details of the personal information that will be processed include, for example: name, address, date of birth, contact details, financial information.

### **HM Revenue & Customs (HMRC)**

In order to fulfil our legal obligations with HMRC (Payroll, VAT, Corporation Tax) we will share relevant information with HMRC.

### **Courts and Tribunals**

In order to fulfil any legal obligation with a Court or Tribunal we will share relevant information where legitimately requested.

### **Trade Unions**

In order to make payment of Trade Union Membership premiums (deducted through payroll) we will share the relevant personal information with the relevant Trade Union.

### **Payroll Deduction Bodies**

In order to make payment of payroll deductions (for example: Give as You Earn, Cycle to

Work Scheme, Childcare Deduction, Court Order) we will share your relevant personal information with the relevant body.

### **National Audit Office (National Fraud Initiative)**

In order to fulfil our legal requirement to participate in the National Fraud Initiative we will share personal information with the National Audit Office.

### **Transfer outside of the European Union (EU)**

We do not currently transfer personal information outside of the European Union.

However, if this changes, SWC will put in place an appropriate contractual provisions to ensure that information is held and used in a way that is consistent with and which respects the EU and UK laws on data protection.

### **Use of Artificial Intelligence (AI) and Automated Decision Making**

South West College may use Artificial Intelligence (AI) technologies to support application processing, enrolment management, and to enhance student services. Where AI tools process personal data, this will be done in compliance with UK GDPR and the Data Protection Act 2018. All outputs generated by AI are subject to human review before any decisions affecting individuals are made.

The College will not use automated decision making, including AI, to make decisions that will have significant impacts on data subjects without appropriate safeguards.

### **How long we keep your information**

If we collect your personal information, the length of time we retain it is determined by a number of factors including the purpose for which we use that information and our obligations under other laws.

We may need your personal information for satisfying our legal, accounting and reporting requirements. For this purpose, we will retain your information in line with the Northern Ireland Further Education Sector Retention and Disposal Schedule that is available

The only exceptions to this are where:

- The law requires us to hold your personal information for a longer period, or

delete it sooner;

- You exercise your right to have the information erased (where it applies) and we do not need to hold it in connection with any of the reasons permitted or required under the law;
- We bring or defend a legal claim or other proceedings during the period we retain your personal information, in which case we will retain your personal information until those proceedings have concluded and no further appeals are possible; or
- In limited cases, existing or future law or a court or regulator requires us to keep your personal information for a longer or shorter period.

For full details on our Privacy Notice and your Rights, please visit our website

<http://www.swc.ac.uk/discover/public-information>

### **The Right to Lodge a Complaint**

If you are not happy with how your information is being processed by the College, please contact the DPO:

*Data Protection Officer  
South West College  
2 Mountjoy Road  
Omagh  
Co Tyrone BT79 7AH  
Email: [gdpr@swc.ac.uk](mailto:gdpr@swc.ac.uk)*

If you are dissatisfied with the College response, you have a right to complain to the Information Commissioners Office (ICO).

### **The ICO contact details are:**

*Information Commissioner's Office  
Wycliffe House  
Water Lane  
Cheshire SK9 5AF  
Tel: 0303 123 1113 or 01625 545 745*

### **Changes to this Privacy Notice**

This Privacy Notice is reviewed annually, or sooner if there are significant changes in legislation, College Policy, or processing activities.

We reserve the right to update this privacy notice at any time and the current version is available at <http://www.swc.ac.uk/discover/public-information/data-protection>.