

# Marketing 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 to meet our statutory obligations and will respect the privacy of individuals who do not wish their personal data to be used in this way.

This Privacy Notice explains how the College collects, processes and manages your personal data when taking and using photographs, videos, testimonials and audio recordings for use in promotional materials and/or to celebrate the hard work and success of our learners and staff.

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.

The Data Protection Officer for the College is Nicola Nugent.

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

## How will your information be processed?

Photographs, videos, recordings and testimonials will be used to help promote South West College, your achievements or your course. These may be promoted via publications such as the College's prospectus, external marketing, social media platforms, presentations (including those delivered to external stakeholders), student and staff intranet.

## Lawful Basis

The College requires a lawful basis to process personal data and in these situations the College relies on:

- **Article 6.1(a)** – the data subject has given consent to the processing of his or her personal data for one or more specific purposes when processing individual ‘subjects’, named group of ‘subjects’, vulnerable adults, or under 16’s.
- **Article 6.1(f)** – processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data, in particular where the data subject is a child or vulnerable adult i.e. it is in the interests of the College to promote courses, programmes, events and achievements to enhance student numbers during enrolment campaigns and enhance business engagement which in turn support the economic position of the College.

The College will always make individuals aware of photos, video etc taking place through various ways such as pull-up stands and verbal announcements with reference to this privacy notice for further details. Where consent is required, it will be obtained explicitly. Individuals who do not wish to be photographed or recorded will always be given the opportunity to opt out.

Where processing is based on consent, you have the right to withdraw that consent at any time by contacting the Marketing Department or the Data Protection Officer. Withdrawal of consent will not affect the lawfulness of processing prior to withdrawal.

### **Categories of Personal Data**

To assist Marketing to deliver its main functions in promoting the College via advertising, online presence, newsworthy success stories for staff and students we will process the following information about you:

- Images (video / photograph)
- Recorded speech
- Name
- Course programme
- Qualifications achieved
- Awards attained
- Contact details e.g. telephone number/email address (not in public domain)
- Hometown

## **Who will have access to my information, or who will you share it with?**

We will only share your personal information where there is a lawful basis to do so.

The following third-party service providers may process personal information about you:

- Newspaper publishers
- Social media platforms
- Other publications (e.g. industry specific magazine)

We require third party service providers to respect the security of your data and to treat it in accordance with the law

Some areas are already regarded as public information. For example, your final academic award is regarded as public information and details will be printed in the graduation programmes and forwarded to the Marketing Office to enable a lifelong relationship to be maintained. Graduation lists will also be forwarded routinely to media outlets. Graduation ceremonies are regarded as public events and may be recorded and/or live streamed by the College.

For full details on Data Protection and your Rights, please visit our website

[Privacy & Data Protection | South West College \(swc.ac.uk\)](https://www.swc.ac.uk/privacy-and-data-protection)

## **International Data Transfer**

Transfer of personal data to the European Union, to third countries or international organisations is restricted under UK GDPR regulations. Overseas sharing will be processed in accordance with [Chapter V](#) of UK GDPR.

## **Retention Period**

We will only retain personal data for as long as necessary to fulfil the purpose we collected it for, for the purpose of satisfying any legal, accounting or reporting requirements. The College will retain records in line with the [FE Sector Retention and Disposal Schedule](#).

## **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*

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*

**Your duty to inform us of changes**

It is important that the personal information we hold about you is accurate and current.

Please keep us informed if your personal information changes during your working relationship with us.

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

AI may be used for content generation and image tagging.

All outputs generated by AI are subject to human review before any decisions affecting individuals are made.

**Failure to provide personal information**

If you fail to provide certain information when requested, we will not be able to fulfil our legal obligations or deliver the service you have requested.

**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>.