

Privacy notice for suppliers of goods and services

Kings Academy Trust



Effective from

1 September 2026

Next review

September 2027, or earlier if processing changes

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1. Introduction

This privacy notice explains how Kings Academy Trust collects and uses personal information about sole traders and the representatives, employees, agents and subcontractors of organisations that supply or seek to supply goods or services. It applies across the Trust and its academies unless a more specific notice is provided at the point of collection.

Kings Academy Trust is the data controller. We process personal information under the UK General Data Protection Regulation (UK GDPR), the Data Protection Act 2018 and the Data (Use and Access) Act 2025.

The Trust's Data Protection Officer is Satswana and can be contacted at admin@satswana.com.

2. Personal information we use

- name, role, organisation, business address and contact details
- tender, quotation, due-diligence, reference, qualification and employment-history information where relevant
- contract, purchase-order, invoice, tax, bank and payment information where it relates to an individual
- signatures, approvals, declarations of interest, insurance and professional-registration details
- identity, right-to-work, safeguarding and DBS information where required for the work
- visitor, vehicle, access-control, CCTV, device and communications logs
- information about performance, complaints, incidents, disputes, fraud checks and contract management
- health or accessibility information needed for safe access to Trust premises.

3. Why we use it

- conduct procurement, tendering and due diligence and decide whether to engage a supplier
- enter into, administer, monitor and enforce contracts and purchase orders
- receive goods and services, communicate with supplier personnel and make payments
- meet tax, accounting, audit, procurement, health and safety and safeguarding duties
- manage conflicts of interest, prevent fraud and protect pupils, staff, systems and premises
- respond to complaints, incidents, disputes, insurance matters and legal claims.

4. Lawful bases

- Article 6(1)(b), contract: processing necessary to enter into or perform a contract with an individual supplier or sole trader
- Article 6(1)(c), legal obligation: tax, accounting, audit, procurement, health and safety, safeguarding and other legal duties
- Article 6(1)(e), public task: supplier processing necessary to deliver the Trust's education and safeguarding functions
- Article 6(1)(f), legitimate interests: managing business relationships, organisational security, fraud prevention, procurement assurance and legal claims where this is not an official public task and individual rights do not override the interest
- Article 6(1)(d), vital interests: responding to a life-threatening emergency
- Article 6(1)(a), consent: only for genuinely optional processing.

5. Special category and criminal offence data

Some information needs additional protection under data protection law. The special category data we may use includes:

- health, disability and accessibility information needed for safety or reasonable adjustments.

We use this information only where it is necessary for the purposes described in this notice and where we have both an Article 6 lawful basis and an Article 9 condition. Depending on the purpose, the Article 9 conditions we rely on are:

- Article 9(2)(g): substantial public interest supported by an applicable DPA 2018 Schedule 1 condition, including safeguarding or preventing fraud
- Article 9(2)(f): establishing, exercising or defending legal claims

- Article 9(2)(a): explicit consent where appropriate.

Photographs and ordinary CCTV images are personal data but are not automatically special category data. They become biometric special category data only if they are technically processed to uniquely identify a person.

Where we use information about criminal convictions or offences, including relevant DBS information, we do so under Article 10 UK GDPR and an applicable condition in Schedule 1 of the Data Protection Act 2018. This will normally relate to employment, safeguarding, preventing fraud or protecting children and other vulnerable people. Where required, the Trust maintains an Appropriate Policy Document.

6. How we collect information

We collect information from you and your organisation through quotations, tenders, contracts, purchase orders, invoices, due-diligence checks, correspondence, visits and contract-management activity. We will explain whether information is mandatory and the consequences of not providing it.

We may also receive information from procurement partners, references, professional or public registers, Companies House, credit or fraud-prevention services where used, local authorities, the Disclosure and Barring Service, Trust academies and publicly available sources.

7. Retention and security

We keep supplier information during the procurement and contract relationship and afterwards for the periods set out in the Data Retention Schedule.

The exact period depends on the type of record. We apply the Trust's Data Retention Schedule, taking account of statutory record-keeping duties, safeguarding requirements, financial and audit rules, limitation periods, regulatory guidance and whether information is needed to establish, exercise or defend legal claims. Different periods apply to unsuccessful tenders, contracts, invoices and tax records, safeguarding checks, declarations of interest, performance records, visitor logs and disputes. Financial and contract records are normally retained long enough to meet tax, audit and limitation requirements.

We use appropriate technical and organisational measures to protect personal information against accidental loss, unauthorised access, alteration or disclosure. Access is limited to people who need the information for their role. Information is securely deleted or destroyed when it is no longer required.

A copy of the relevant retention schedule or further information about a particular retention period is available from the Data Protection Officer.

8. Sharing and international transfers

Where necessary and lawful, we may share supplier information with Trust academies, procurement partners, finance and payment providers, banks, HM Revenue and Customs, auditors, insurers, professional advisers, IT and security providers, local authorities, safeguarding bodies, police, courts and regulators. If another privacy notice applies—for example, the visitor notice when supplier personnel attend a site—it should be read alongside this notice.

International transfers

Some service providers may store or allow access to personal information outside the UK. Before making a restricted transfer, we check that UK adequacy regulations apply, or put in place an appropriate safeguard such as the UK International Data Transfer Agreement or UK Addendum and complete the required data protection test. We use an Article 49 exception only where the law permits. Contact the Data Protection Officer for information about the safeguard used for a particular service.

9. Your data protection rights

Depending on the circumstances and the lawful basis being used, you may have the right to:

- be informed about how we use your personal information
- ask for access to the personal information we hold about you
- ask us to correct inaccurate or incomplete information
- ask us to erase information or restrict its use in certain circumstances

- object to processing in certain circumstances, including direct marketing
- receive information in a portable format where the right to data portability applies
- withdraw consent at any time where consent is our lawful basis, without affecting earlier lawful processing
- ask for safeguards and human involvement where a significant decision is made solely by automated means
- complain to us and to the Information Commissioner's Office.

These rights are not absolute. For example, erasure does not normally apply where we must keep information to comply with a legal obligation or perform a public task. We will explain any restriction that applies when responding to a request.

To exercise a right, contact the Data Protection Officer or the Trust's Data Protection Lead using the details in section 12. We may ask for information needed to confirm identity and locate the relevant records.

10. Automated decision-making and profiling

The Trust does not currently make decisions about you based solely on automated processing where the decision has a legal or similarly significant effect. Digital and artificial-intelligence tools may support administrative work, but accountable staff remain responsible for significant decisions.

If this changes, we will update the relevant privacy information before the processing begins and explain the logic involved, likely effects and safeguards, including how to obtain human intervention and challenge a decision.

11. Data protection complaints

You can make a data protection complaint by emailing admin@satswana.com or ddonnelly@kingsacademytrust.co.uk, or by writing to the Trust at the address in section 12. Please describe the issue and the outcome you are seeking.

We will acknowledge receipt within 30 days. Without undue delay, we will make appropriate enquiries, keep you informed where an investigation is continuing, and tell you the outcome and any action taken.

You may also complain to the Information Commissioner's Office. The ICO can be contacted on 0303 123 1113 or through <https://ico.org.uk/make-a-complaint/>. The ICO's postal address is Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF.

12. Contact us

Kings Academy Trust, City Approach 1, Albert Street, Eccles, M30 0BG

Data Protection Officer: Satswana — admin@satswana.com

Data Protection Lead: David Donnelly — ddonnelly@kingsacademytrust.co.uk