

Traded Services Privacy Notice

version 1.1

Changes to this notice

We keep this privacy notice under regular review and we will place any updates on this web page. This Notice was last updated on 09 May 2024.

This privacy notice applies <add scope of services the notice applies to> provided by Worcestershire County Council and should be read in addition to Worcestershire County Council's [Full Privacy Notice](#) and the <add in any related privacy notices>.

The privacy notice will cover:

- [Purpose for processing](#)
- [Personal information collected and lawful basis](#)
- [Who we may share your information with](#)
- [How long we will hold your information](#)
- [Your information rights](#)

Purpose for processing

Traded Services process personal data in order to provide training or consultancy services either directly or jointly with partners and commissioned private and third sector providers. This includes:

- Processing orders for services
- Helping us to develop and improve our services to you
- Targeted marketing communications
- Enabling users to book training/conferences
- To provide a record of training/conferences attended
- To provide a record of services purchased by individuals/establishments
- To undertake financial processes

Personal data collected and lawful basis

The service processes personal data which is relevant to individual cases which may include, but is not limited to, the following personal data:

- Names
- Job titles
- Telephone numbers
- Corporate personal email address
- Company name

We may also process some special category (sensitive) data, which is relevant to individual cases and may include some of the following but is not limited to:

- Whether or not you have a disability or additional support needs for which the organisation needs to make reasonable adjustments

The legal bases for processing this personal data are:

- **Consent** – the individual has given clear consent to be included within a marketing list(s)
- **Contract** – the processing is necessary for a contract you / your organisation has with Worcestershire County Council

The special category condition for processing is:

- Necessary for reasons of substantial public interest (statutory etc. and government purposes) set out in Schedule 1 of the DPA 2018 condition 8 equality of opportunity or treatment

Who we may share your information with

We may need to share the personal information you have given to us or we've collected about you with partner organisations where relevant to the individual/establishments and/or their care provision. These include but are not limited to:

- Education and early years settings
- Internally within WCC to enable provision of training
- External moderators

Information will only ever be shared when it is strictly necessary to help us provide effective services and you may have the right to refuse. We will not pass it onto any other parties unless required to do so by law or in all reasonable circumstances the disclosure is fair and warranted for the purposes of processing or subject to a data protection exemption.

We have specific data sharing agreements in place with local agencies and sometimes the law requires that we may have to pass your details on to a third party, for example, to prevent crime.

How long we will hold your information

The standard record retention for personal information added to CPD Online is 3 years after the user has been unliked from an establishment. Information added to e-Store is retained for 6 years after the end of the financial year. However, there are also a range of other retention periods affecting different types of information and service needs that are provided by Traded Services. More information about our retention periods can be found in our [summary Disposal Schedule](#).

Please note stated retention periods may be subject to any legal holds imposed under the Inquiries Act 2005 that may concern the information and override standard retention periods.

Your information rights

You are entitled to a copy, or a description, of the personal data we hold that relates to you, subject to lawful restrictions. Please go to our [Make a Data Protection Request webpage](#) to find out how to make a request.

You may be entitled to rectification, restriction, objection, and erasure of your personal information depending on the service and legal basis. Please in the first instance contact schoolservices@worcestershire.gov.uk to exercise these Information Rights or call the main Worcestershire County Council contact telephone number of **01905 763763**.

Please see our overarching Privacy Notice (<http://www.worcestershire.gov.uk/privacy>) for further contact details and if you have a complaint about your information rights.