



Privacy Notice for Visitors

This Privacy Notice outlines how the United Colleges Group uses your information (for City of Westminster College and the College of North West London) when you are a visitor to our premises.

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Document Control

Version & Revision Status

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Document Change History

| Version | Date | Changes Made | Made By |
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| 3.0 | July 2025 | After review by GRCI Law (DPO), it was determined that the policy v2.0 was too light on content. The policy has been updated by GRCI Law (DPO) with additional content. Document Control and Change History have also been added. | Gora Selliah and GRCI Law (DPO) |
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INTRODUCTION

United Colleges Group (“UCG”, “we”, “us”, “our”) is committed to respecting and protecting your personal data in accordance with our responsibilities under data protection law.

We have a responsibility to provide individuals with information about how we process their personal data, including by providing relevant privacy notices which explain how and why we collect and use personal data.

This privacy notice (“Notice”) explains how we collect, use, share, and protect your personal data when you are a visitor to any of our premises. It also explains who your personal data will be shared with and what rights you have in relation to our use of that personal data.

This Notice should be read in conjunction with our main Privacy Notice, as well as any other relevant privacy notices we may provide from time to time.

1. WHO WE ARE

UCG is the data controller of the personal data we collect in relation to visitors. As a data controller, we are responsible for deciding how we store and use the personal data we collect about you.

2. HOW TO CONTACT US

Contact Details:

United Colleges Group
Paddington Green Campus
25 Paddington Green
London W2 1NB
United Kingdom

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| ICO Registration Number: | ZA417156 |
| Email: | gdpr@ucg.ac.uk |
| Telephone: | 020 7723 8826 (City of Westminster College) 020 8208 5000 (College of North West London) |

3. OUR DATA PROTECTION OFFICER

Our Data Protection Officer (or “DPO”) is responsible for advising us on our compliance with data protection law and oversees questions in relation to this Notice. If you have any questions or concerns about our privacy practices or in relation to this Notice, please contact our DPO.

Data Protection Officer (DPO): GRC Solutions (GRCI Law)

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| Email: | dpoaas@grcsolutions.io |
| Telephone: | 0333 900 5555 |

4. WHO THIS NOTICE APPLIES TO?

This notice applies only to visitors to our premises. This may include:

- Prospective students and those accompanying them.
- Prospective employees.

- Service providers and contractors.
- Guest speakers and external trainers.
- Academic inspectors and visitors from regulatory bodies.
- Visitors from partner organisations.
- Parents and / or guardians.
- Event attendees.
- Members of the public.

5. WHAT PERSONAL DATA WE COLLECT

The personal data we process about you will vary depending on the reasons for which you are visiting us. The following are examples of the types of personal data we may collect and process in relation to visitors to our premises:

- Identification and contact details.
- Organisation and / or employer details including name and contact details, for example, if you are visiting from a contractor or service provider, or you represent an inspectorate or regulatory body or partner organisation.
- The date and time of your visit ('in' and 'out' times).
- Details from any credentials or other identification information provided by you when identifying yourself to us, advising us of your arrival or registering your visit with us.
- The reason for your visit and member(s) of staff or other person(s) visited.
- Vehicle information, such as vehicle registration details (if you are parking on our premises).
- Information required to make accommodations for you (for example, accessibility requirements, dietary requirements).
- Images captured via the operation of any CCTV and BWV systems under our control which operate in and / or around our premises.
- Information relating to your use of our information and communications systems, including guest Wi-Fi access records.
- Accident, medical and first aid information and, as applicable, for example in the event that you are injured or taken unwell whilst on our premises.

6. SPECIAL CATEGORY DATA

We do not routinely collect special category data, or "sensitive" data from visitors to our premises. However, there may be some situations in which we will require to do so. In the context of visiting our premise, this may include a need to collect information relating to your health. This would be to manage injury, sickness or emergencies occurring within our premises.

7. HOW WE COLLECT INFORMATION ABOUT YOU

We will collect information about you in a variety of ways.

In most cases, the personal data we collect about you when you visit us will be provided to us directly by you (for example, when you sign in to register your visit with us or otherwise notify us that you will attend a meeting or appointment at our premises).

We may also receive personal data indirectly, for example, from staff or other persons involved in arranging and / or hosting your visit to our premises.

8. HOW WE USE YOUR PERSONAL DATA

We will collect personal data relating to your visit to our premises for a variety of reasons, including to:

- Manage access to our premises, including to register visitors and issue visitor access credentials.
- To maintain oversight of building capacity.
- Safeguard our students and staff and to ensure we know who is on the premises at any time.
- Ensure the security of our premises and assets.
- Manage the parking arrangements within any private parking areas relating to our premises and controlled by us.
- Ensure the safety of visitors, as well as of our staff and students, including compliance with health and safety requirements and managing emergency situations such as fire or other emergency evacuations.
- Accommodate any visitor accessibility requirements, including in relation to physical access, as well as dietary requirements.

9. THE LAWFUL BASES FOR PROCESSING YOUR PERSONAL DATA

We only process personal data where we have a lawful basis for doing so under data protection law. In the context of visitors to our premises, the lawful bases we rely on include:

- Legitimate interests, for example maintaining the safety and security of our premises through visitor logs, access passes, and CCTV monitoring or to enable us to respond to and defend legal claims.
- Legal obligations, such as complying with health and safety, safeguarding, and fire safety requirements.
- To fulfil our contractual obligations with you, for example, where you have been engaged to attend our premises to provide services such as on-site training or as a guest speaker.
- Public task, where processing is necessary for us to carry out our educational and safeguarding responsibilities as a public body; and
- Vital interests, where it is necessary to protect your life or the life of another person, for example in the case of a medical emergency.

Where we process special category data (such as health information), we will only do so where one or more of the following conditions applies in addition to a lawful basis as referred to above:

- The processing is necessary in order for us to comply with employment, social protection, or health and safety law.
- It is necessary for reasons of substantial public interest, including safeguarding and statutory reporting duties.
- It is necessary to protect vital interests in an emergency; or
- You have manifestly made the information public yourself.

10. WHO WE SHARE YOUR PERSONAL DATA WITH

We may share your personal data with third parties where necessary to enable us to process your personal data as set out in this Notice. We will only share your personal data with third parties where such sharing is lawful and proportionate.

The third parties with whom we may share your personal data may include third party processors, such as service providers who provide certain parts of our services for us (for example, [providers of our facilities and meeting room booking software, event registration management software and / or software which generates visitor swipe cards, access credentials and / or parking passes]). Where we engage such third-party processors, they will process your personal data strictly on our behalf and in accordance with our instructions. We put contracts in place with such third parties and do not allow them to use your personal data for their own purposes.

Other third parties with whom we may share your personal data may include:

- Law enforcement agencies, prosecuting bodies and other interested parties for the prevention, investigation, detection, or prosecution of criminal offences, or to otherwise comply with legal obligations.
- Emergency services such as the police, fire, or ambulance services in the event of an incident at or impacting our premises or the assets or persons within them.
- Relevant regulators, including the Health and Safety Executive.
- Legal representatives and professional advisors in order to protect or defend our legal rights or in connection with legal claims, disputes, or proceedings.
- Insurance providers and claims handlers, in order to manage or investigate incidents or claims.

Special category personal data will only be shared with such third parties where necessary, for example, in the event that we are required to notify details of an accident occurring at our premises to the Health and Safety Executive.

We may also share information internally with our organisation, including, as applicable, between departments, for example, to confirm your attendance at our premises or to verify your safety in the event of an emergency.

11. INTERNATIONAL DATA TRANSFERS

We may transfer your personal data to locations outside the UK where required or permitted, for example, where an appointed service provider performs part of their services from outside the UK. Any transfers of personal data to locations outside the UK will occur only where and as permitted under data protection law.

12. PERSONAL DATA SECURITY & DATA BREACHES

We are committed to ensuring the security of your personal data. We implement appropriate technical and organisational measures to protect personal data against unauthorised access, accidental loss, destruction, or damage. These measures include access controls, encryption, secure storage systems, and regular information security training for our staff.

We have procedures in place to identify and manage data breaches impacting the personal data we process. These include processes to notify affected individuals, as well as the Information Commissioner's Office (ICO), of any such breach if required to do so by law.

13. DATA RETENTION

We retain personal data only for as long as is necessary having regard to the purposes for which it was collected, and in accordance with legal, regulatory, accounting, reporting and contractual requirements, and our Retention Policy.

We determine appropriate retention periods for personal data by having regard to the amount, nature, and sensitivity of the relevant personal data, the potential risk of harm from unauthorised use or disclosure of it, the purposes for which we process it, whether we can achieve those purposes through other means, and by reference to applicable legal and / or regulatory requirements.

Once a relevant retention period applying to personal data has expired, we will ensure that the relevant personal data is securely and irreversibly deleted, destroyed, or anonymised, depending on its purpose and applicable legal requirements.

14. YOUR RIGHTS

Data protection law provides individuals with certain rights in relation to their personal data. These are:

Right of access: the right to request confirmation as to whether we hold personal data about you and to access a copy of that data along with information about how and why it is used (this is often referred to as a “data subject access request”).

Right to rectification: the right to request that inaccurate or incomplete personal data be corrected or updated without undue delay.

Right to erasure: In certain circumstances, the right to request that your personal data be deleted, for example where it is no longer necessary for the purposes for which it was collected.

Right to restrict processing: the right to request that the use of your personal data be limited in specific cases, such as during a review of the accuracy of the data.

Right to object to processing: the right to object to the processing of your personal data where it is based on our legitimate interests or is carried out for direct marketing purposes.

Right to data portability: the right, in certain circumstances, to require that we provide you with an electronic copy of your personal data either for your own use or so that you can share it with another organisation. Where this right applies, you can ask us, where feasible, to transmit your personal data directly to the other party.

Right to withdraw consent: where we rely on your consent to process your personal data, the right to withdraw that consent at any time. Withdrawal does not affect the lawfulness of processing that took place before consent was withdrawn.

To exercise any of your rights, please contact our Data Privacy Team at: gdpr@ucg.ac.uk

15. COMPLAINTS

If you have concerns about how your personal data is being used, or wish to make a complaint, please contact our Data Privacy Team in the first instance using the contact details given in the **HOW TO CONTACT US** section of this Notice.

We aim to resolve all concerns promptly and in accordance with our internal complaint procedure.

You also have the right to lodge a complaint directly with the ICO (the UK’s supervisory authority for data protection) if you are concerned about how your personal data is being handled. The ICO can be contacted as follows:

Information Commissioner's Office
Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF
Website: <https://ico.org.uk/concerns>
Telephone: 0303 123 1113

16. REVIEW AND UPDATES TO THIS NOTICE

This Notice is kept under regular review and may be updated from time to time to reflect changes to our legal obligations, our data processing activities, or institutional and operational practices.