

## Marketing Privacy Notice

### Who is the Data Controller?

We are the data controller of personal information about you. We are Walsall College. Our address is, Wisemore Campus, Littleton Street West, Walsall, WS2 8ES.

If you have any questions about this policy or the ways in which we use your personal information, please contact our Data Protection Officer on 01922 657014 or [dataprotection@walsallcollege.ac.uk](mailto:dataprotection@walsallcollege.ac.uk).

### What personal information does Walsall College collect?

This privacy notice tells you what to expect when Walsall College including Construction College Midlands (CCM) collects personal information. It covers why we collect personal information, how we use it and how we keep it secure. It applies to information we collect about:

We will collect personal information from you, this information includes:

- Visitors to our website.
- People who register to attend, or attend, one of the virtual or in person events run by Walsall College.
- People who enquire about courses at Walsall College.
- People who apply for courses.
- People who contact us through our website and Social Media Channels.
- People who phone the main college reception.
- People who email the college.

We are committed to preserving the privacy of all visitors to our website. Walsall College takes the security of your personal information seriously, we have internal controls in place to ensure that your data is not lost, corrupted, accidentally destroyed, rendered unavailable, misused or disclosed, and is not accessed except by authorised employees in performance of their duties. We do not disclose personal data of our users to third-parties, unless we have a valid lawful basis

### Why does Walsall College collect personal information?

Walsall College is committed to being transparent about the data it collects and uses that data lawfully in line with its data protection obligation.

We collect personal information about you to effectively manage your learning and to meet our statutory obligation as an educational setting.

The lawful basis we rely on are: Legal obligation, fulfilling a public function, consent and where it is necessary for the performance of our contract with you.

#### Google Analytics

When someone visits our website, we use a third party service, Google Analytics, to collect standard internet log information, IP addresses and details of visitor behaviour patterns. We do this to find out things such as the number of visitors to the various parts of the site. We do not

make, and do not ask Google to make, any attempt to find out the identities of those visiting our website.

Search terms used on our website are collected and processed, to help improve our website and search functionality. No user-specific data is collected by the College.

### **Event registrations**

When you register for, or attend, one of our events we will ask you to provide some basic information including your name, contact details, subject area(s) you are interested in studying and the level of study (full-time, university level, apprenticeships or part-time). You may also be asked about your current situation, including the school/college currently attending, employment status and likely year of entry. This data is collected to ensure we can provide you with the information that you may need to decide to study with us, and improve the advice that we provide you with, as well as understanding the geographic reach that we have as an educational provider. At the time of requesting the information your consent to process this data will be sought. This data will be held for a maximum of two years, or until the expected year of entry to the College (as determined by the information submitted and age) has passed.

### **Event Management**

Walsall College use third party data processors to manage events held at Walsall College. Upon registration for these events you will enter your details directly into Eventbrite, Zoom and/or Hubspot and will be subject to their privacy policies. You can view these below:

[Eventbrite Privacy Policy](#)

[Zoom Privacy Policy](#)

[Hubspot Privacy Policy](#)

All contact details and personal information entered via these 3<sup>rd</sup> party event management platforms is also accessible to Walsall College and we collect this information in order to provide you with specific information regarding the event(s) you register for.

### **Enquiry – Collection and Management**

When you make an enquiry to Walsall College to enable us to provide you with the best service tailored to yourself we ask you for some information. Enquiries can be made using our website, when you engage with us at events, send an email or when you speak to any of our staff. This data is collected to help us to provide you with the best possible service and refine our marketing channels. Personal data from all enquiries are stored within the College CRM system – Hubspot.

**Student Enquiry** – We will ask you some basic information relating to your enquiry such as name, address, level of study, subject of interest, when you are looking to join us and how you heard about the college. You may also be asked to provide details of your current school / college and/or employment status to help us to handle your enquiry.

**Employer Enquiry** – We will ask you to provide some basic information: name, job title and contact details as well as details about the company you are enquiring on behalf of.

**General Enquiries** – We will ask you to provide your contact details and information relating to your enquiry so it can be dealt with accordingly.

For all of the above purposes we rely on the legal basis of 'public task' or necessary for a contract to enable us to use your personal data to respond to your enquiries.

In addition, at the time of requesting this information your Consent to process the data for marketing purposes will be sought. When we ask for your Consent we will provide specific details of how we wish to use your data. Data collected for marketing purposes will be held within Hubspot and/or Jotform:

### **Course applications**

Walsall College collects and processes personal data relating to its learners to effectively manage learning and to meet its statutory obligations as a Further Education College. Walsall College is committed to being transparent about data it collects and uses that data lawfully in line with its data protection obligations. To view how we handle this data please visit – [www.walsallcollege.ac.uk/policies-procedures/#dataprotection](http://www.walsallcollege.ac.uk/policies-procedures/#dataprotection)

### **Social media**

#### **Enquiries:**

Walsall College uses a third party data processor, Hubspot to manage our Social Media Accounts, the information that you choose to share with us on social media through sites including Facebook, Twitter, LinkedIn, YouTube, Instagram, SnapChat and TikTok is available to us and responded to through Hubspot, See below for details on this platform. We may ask you for personal information such as your name, address, email and phone number which will only ever be done through private message and then used to respond to your enquiry. We rely on the fact that we have a 'legitimate interest' in using personal data in this way to respond to enquiries We will never share this information with any other 3<sup>rd</sup> parties.

#### **Advertising:**

We partner with third party social media platforms and websites to manage our advertising.

We use Lead Generation forms within these platforms to generate enquiries for Walsall College, we ask you to provide contact details as well as information about course interests and personal circumstances to be able to contact you about appropriate courses. Information submitted within these forms is processed within HubSpot and relies on your Consent. These websites use cookies to collect information about your activities on this and other websites to provide you with targeted advertising. If you do not wish to have this information used for the purpose of serving you targeted ads, you may opt-out by [clicking here to access the WebChoices Tool](#). Please note this does not opt you out of being served advertising as a whole, you may continue to receive generic ads but not based on your IP address or website activity.

Links to the social media privacy policies are below:

[Facebook](#)

[Twitter](#)

[LinkedIn](#)

[YouTube](#)

[Instagram](#)

[SnapChat](#)

[TikTok](#)

### **Email**

Emails that are sent to Walsall College may also be stored within our Company CRM database Hubspot these will be stored for two years after the last communication was made.

## Marketing Communications

If you register an interest with Walsall College, via any electronic forms you will be given the opportunity to opt in / consent to receive future marketing communications. This is done at the point where your personal information is first collected and will only be used for the purpose to which you have consented.

This information is stored in HubSpot. Within any marketing communications, you will be provided with a simple and transparent way to unsubscribe. Any changes you request to how your personal information is processed for the purposes of marketing and/or the provision of service updates will be acted on promptly.

We will not share your information obtained for marketing purposes with third-party organisations outside of Walsall College.

### Text Messages

Where you consent to receive marketing communication by text message we use a third party data processor to send these messages on our behalf. We share your first name, last name, email address and mobile number. The providers we use for this service are TextAnywhere and Sakari to view their Privacy Policy please see below:

[TextAnywhere Privacy Policy](#)

[Sakari Privacy Policy.](#)

### Surveys

Where you consent to participate in any feedback or surveys conducted by Walsall College we use a third party data processor, Survey Kiwi to gather these responses. At the point of the survey you will enter your information directly into a Survey Kiwi questionnaire and data held will be subject to their privacy policy. This information is also transferred to Walsall College Hubspot CRM and held for a period of two years.

[Survey Kiwi Privacy Policy](#)

### CRM - Hubspot

Where referred to above, we use a third party data processor, HubSpot, to store the data you provide through the forms on our website, hosted landing pages, event registration/attendance, emails, website and advert interaction, social media enquiries, and course applications.

All data we collect is collated into a contact / company Customer Relationship Management record and is used by Walsall College to improve communication and customer service.

This platform also integrates with Eventbrite, Zoom, Jotform, Sakari and Surveykiwi and allows data collected within each to be stored within HubSpot. We use a provider called Zapier to assist with transferring of data from/to HubSpot for internal purposes within college.

For more information on HubSpot Privacy Policy please [click here](#).

## Cookies

Cookies are text files placed on your computer to collect standard internet log information and visitor behaviour information. This information is used to track visitor use of the website and to compile statistical reports on website activity.

### **Granting us permission to use cookies**

If the settings on your software that you are using to view this website (your browser) are adjusted to accept cookies we take this, and your continued use of our website, to mean that you are fine with this. Should you wish to remove or not use cookies from our site you can learn how to do this below, however doing so will likely mean that our site will not work as you would expect.

Like many websites, we also obtain certain types of information when your web browser accesses [walsallcollege.ac.uk](http://walsallcollege.ac.uk), or advertisements and other content served by or on behalf of Walsall College on other websites. This information is used to provide measurement services and target advertisements.

For further information visit [www.aboutcookies.org](http://www.aboutcookies.org) or [www.allaboutcookies.org](http://www.allaboutcookies.org).

You can set your browser not to accept cookies and the above websites tell you how to remove cookies from your browser. However in a few cases some of our website features may not function as a result. More information about the cookies we use on our website is available in our [Cookies Policy](#).

### **Other websites**

This website may contain links to third-party websites and partner sites. We do not control, and are not responsible for, the collation of any personal information by third parties whose privacy policy is different to ours. We encourage you to read the privacy statements on the other websites you visit.

### **How does Walsall College share personal information?**

Your information may also be shared internally with Walsall College staff who need the data to provide teaching and learning services to you. This will include special category data, where necessary.

### **Does Walsall College process personal information outside the EEA?**

Walsall College will not transfer or store your data to countries outside the European Union, to third countries or international organisations.

### **How does Walsall College protect personal information?**

Walsall college takes the security of your personal information seriously and has internal policies and controls in place to ensure that your information is not lost, corrupted, accidentally destroyed, rendered unavailable, misused or disclosed, and is not accessed except by authorised employees in the performance of their duties.

The Data Protection Policy is available to view on our website <https://www.walsallcollege.ac.uk/wp-content/uploads/2022/11/Data-Protection-Policy.pdf>, or can be collected from the Data Protection Officer.

## How long does Walsall College keep personal information?

All Personal Information will be held as long as is necessary to fulfil our legal obligations or carry out public functions. Details of how long specific records are retained is set out in the Retention Schedule. The Retention Policy takes into account the need to meet any legal, statutory and regulatory obligations.

Any information that is no longer required will be disposed of securely. We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting or reporting requirements

### Retention of your personal data

Hubspot – Contact information and details of your enquiry will be held for a maximum of two years from your last enquiry or until the expected year of entry to the College (as determined by the information submitted and your age) has passed.

Hubspot – Contact details used for Marketing with your Consent will be held for .....  
You can however withdraw your Consent for your information to be used in this way at any time

Jotform – where data is collected through Jotform it is automatically transferred to HubSpot and held as detailed above. Data is removed from Jotform one month after submission.

## What rights do you have?

As an individual, you have a number of rights. You have the right to be informed about how and why your data is being processed and that is why we include the information in this privacy notice. You can also:

- access and obtain a copy of your data on request.
- require Walsall College to update incorrect or incomplete data.
- require the college to delete or stop processing your data, for example where the data is no longer necessary for the stated purposes of processing (specific circumstances only).
- obtain and reuse your data for your own purposes across different services. (limited circumstances).
- object to the processing of personal information (specific circumstances).
- object to the processing of your data for marketing purposes, this right always applies. Where the College is relying on its legitimate interests or performance of a public task as the legal basis for processing your personal data, you may also object to the processing and this will be considered on a case-by-case basis.

In certain circumstances you have the right to have your personal data deleted, this is where the College does not have a justification to retain it. Below is a list of circumstances where the College would delete your personal data:

- Where your personal information is no longer necessary for the purpose that the College originally collected and processed it.
- When the legal basis relied on is Consent and you withdraw that consent.
- If we are relying on our legitimate interests as the legal basis for processing and you have objected and your interests rights or freedoms override our legitimate interests.

- When you have objected to the processing and the College is using your data for direct marketing purposes.
- The personal data was unlawfully processed.
- It is necessary to delete your personal information to comply with a legal obligation;
- The personal information is processed by the College as part of the delivery of information society services to a child under 16 years old.

\*ISS any service normally provided for remuneration, at a distance, by electronic means and at the individual request of a recipient of services. e.g. websites, apps, search engines, online marketplaces and online content services such as on-demand music, gaming and video services

However, the right to be forgotten does not apply where the College relies on the following:

- To comply with a legal obligation.
- In order to carry out a task in the public interest or in the exercise of our official authority as a public body and institute of higher education.
- To establish, exercise or defend legal claims.
- To exercise the right of freedom of expression and information.
- For archiving purposes in the public interest, scientific research, historical research or statistical purposes where erasure is likely to make it impossible or considerably difficult for to do this.

If you would like to exercise any of these rights, please visit our Individual Rights page on <https://individualrights.walsallcollege.ac.uk/>.

Where we rely upon student consent to process data this consent can be withdrawn at any time by contacting Walsall College.

## What if I do not provide personal information?

Data that is mandatory to provide will be highlighted on your enrolment form and failure to provide mandatory data required by the College to meet legal obligations in regard to provision to teaching and learning, safeguarding or other statutory obligation will impact on your ability to enrol or receive funding.

## How to contact us

Please contact us if you have any questions about this Privacy Notice, or information we hold about you:

By Email: [dataprotection@walsallcollege.ac.uk](mailto:dataprotection@walsallcollege.ac.uk)  
In writing: Data Protection Officer  
Walsall College  
Wisemore Campus  
Littleton Street West  
Walsall  
WS2 8ES

By phone: 01922 657014

## Who can I complain to?

If you believe that Walsall College has not complied with your data protection rights, you can complain to the Data Protection Officer at [dataprotection@walsallcollege.ac.uk](mailto:dataprotection@walsallcollege.ac.uk). You also have the right to complain to the Information Commissioner at [www.ico.org/concerns](http://www.ico.org/concerns) or by contacting the ICO helpline on 0303 123 1113.

## Changes to our privacy policy

This Privacy Notice is regularly reviewed. This is to make sure that we continue to meet the highest standards and to protect your privacy. We reserve the right at all times, to update, modify or amend this Notice. We will not significantly change how we use information you have already given to us without your prior agreement. The latest version of this Notice can be found at on the College's website.

This Privacy Notice was last updated on 09 May 2023.