

# **Surbiton High School Parents Association**

## **Data Protection Policy**

Data privacy is taken very seriously and Surbiton High School Parents Association (“SHSPA”) are committed to protecting and respecting personal data. SHSPA collect and use such data fairly and in accordance with the requirements of the General Data Protection Regulations (GDPR).

This Data Protection Policy (“The Policy”) provides information about how SHSPA will use or process your personal data. The Policy applies to parents or legal guardians of pupils and contractors who will make contact with SHSPA.

### **Responsibility for data protection**

SHSPA is a registered charity (number 1058888), a Not for Profit organisation. The Data Controller is the SHSPA Committee (“the Committee”) who are appointed at the Annual General Meeting and who have the responsibility to ensure compliance with this policy. SHSPA have not elected a Data Protection Officer, an exemption allowed for Not for Profit organisation.

### **The purposes for which we process your data**

We collect and hold personal information about you to:

- provide information about SHSPA meetings, activities and events to Surbiton High School Parents community
- maintain records of uniform parents have donated for sale via the Nearly New Uniform sales and to facilitate rebates upon sale
- manage volunteer rotas for events
- make contact in event of an emergency

A new purpose; when such arise SHSPA will provide an explanation and obtain your prior consent.

### **The categories of personal data that we process**

The majority of the personal information held is provided directly by parents or legal guardians of pupils or via the third party ticket site Eventbrite. Data is received verbally, in paper form or through digital media. Photographs are captured from ticketed events. Where a pupil is under the age of 13, this information will only be obtained from a parent or guardian and cannot be provided by the young person. The following personal information may be collected:

- Contact details to facilitate communication - including name, title, address, telephone numbers and personal email address.
- Date of birth - to ensure young people are allocated to the appropriate event for their age.
- Emergency contact information – for making contact in the event of emergency.
- Medical information (such as allergies)
- Bank account and other payment details

### **The legal basis for the processing of your data**

The legal basis for processing your data will be for SHSPA’s legitimate interests as approved by the Executive Committee. Information relating data falling within a special category (such as health) will only be processed with your explicit consent.

## **Data retention periods**

SHSPA comply with the obligations under the GDPR by keeping personal data up to date; by storing and destroying it securely; by not collecting or retaining excessive amounts of data; by protecting personal data from loss, misuse, unauthorised access and disclosure and by ensuring that appropriate technical measures are in place to protect personal data. The period of retention for personal data is defined to be six years.

## **Data security**

All members of the SHSPA are informed of the necessity to keep secure your records. Where in digital form documents are to be password protected. Where in paper form to be kept secured and locked.

## **Data Processors**

Young people and other data subject - Personal information may be shared with adult volunteers and teaching staff at Surbiton High School.

Adult volunteers - Personal information may be shared with adult volunteers holding appropriate appointments within the line management structure of SHSPA.

All data subjects - Data may be shared with third parties outside of the organisation where there is a legitimate reason to do so. This will include Eventbrite, Paypal, Dropbox and Surbiton High School. We will never sell your personal information to any third party. The Executive Committee have considered and approved the use of Eventbrite, PAYPAL and Dropbox by confirming they have published GDPR policies. Surbiton High School have their own published privacy notice.

Exceptions to the above third parties; approval will be obtained from the Executive Committee prior to sharing the data.

## **Sharing your data – website cookie**

“Cookie” a small text file placed on a computer when visiting a website.

Form related cookies - Data submitted through forms such as found on the SHSPA contact pages or comment forms; cookies may be set to remember user details.

Third party cookies - In some special cases use is made of cookies provided by trusted third parties. These help to understand how the website is used to support its development.

## **How we store your personal data**

Digital records ie **Dropbox** - is a password-accessed cloud storage of SHSPA.

Personal digital devices used by adult volunteers

Paper, printed records and data e.g. Event registration, Emergency contact details

Paper records can be used as often events are held where internet and digital access will not be available. We minimise the use of paper.

### **Rights of the Data Subject**

Data protection legislation gives individuals certain rights which are detailed below. If you wish to exercise these rights, please contact SHSPA secretary at [secretary@shspa.org.uk](mailto:secretary@shspa.org.uk)

**Right of access to personal data “subject access request”** - You have the right to access the personal data SHSPA hold about you. Requests need to be made in writing. If a child is over the age of 12 they will also need to sign the request. We take the security of personal data seriously, so we may ask you for proof of identity to verify that you are entitled to the information requested.

**Right to withdraw consent** - Where we have obtained your consent to specific processing activities you may withdraw this consent at any time.

**Right to rectification** - You have the right to have the personal data that we hold about you rectified if it is inaccurate or incomplete. We will respond to such requests within one month.

**Right to erasure** - You have the right to have personal data erased in certain specific circumstances. If you make such a request, we will consider whether the right to erasure applies and give you a full and reasoned response.

**Right to restrict processing** - In certain circumstances you have the right to request that we restrict the processing of your personal data. If you make such a request, we will consider whether the right to restrict processing applies and give you a full and reasoned response.

If you disagree with a decision that we have taken regarding the processing of your personal data please contact SHSPA chair at [chair@shspa.org.uk](mailto:chair@shspa.org.uk)

You also have the right to lodge a complaint with the information Commissioners Office on 0303 123 1113 or <https://ico.org.uk/for-the-public/>

### **Who to contact**

If you have any queries relating to this Privacy Notice or our use of your personal data, please contact us by emailing Chair, SHSPA at [chair@shspa.org.uk](mailto:chair@shspa.org.uk) or at the following address: SHSPA, Surbiton High School, 13-15 Surbiton Crescent, Kingston Upon Thames KT1 2JT

### **Document information**

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## APPENDIX 1

### SOME IMPORTANT DEFINITIONS

**'GDPR'** General Data Protection Regulations the regulations set by the European Union, and Data Protection Act 2018 (DPA 2018), the UK law that encompasses the GDPR

**'ICO'** is the Information Commissioner's Office, the body responsible for enforcing data protection legislation within the UK and the regulatory authority for the purposes of the GDPR

**'Personal Data'** Personal data means any information about an identified or identifiable person. For example, an individual's home address, personal (home and mobile) phone numbers and email addresses, occupation, and so on can all be defined as personal data. Some categories of personal data are recognised as being particularly special categories of personal data. These include data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, genetic and biometric information, and data concerning a person's sex life or sexual orientation

**'Processing'** means all aspects of handling personal data, for example collecting, recording, keeping, storing, sharing, archiving, deleting and destroying it.

**'Data Controller'** means anyone (a person, people, public authority, agency or any other body) which, on its own or with others, decides the purposes and methods of processing personal data. We are a data controller insofar as we process personal data in the ways described in this policy.

**'Data processor'** means anyone who processes personal data under the data controller's instructions, for example a service provider. We act as a data processor in certain circumstances.