



PRIVACY NOTICE

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WHO WE ARE

The Trustees of The Society of Friends of Christ College (the SOFCC) recognise that the processing of personal data is required to function. In accordance with data protection law the Trustees are the 'data controllers' being the body that is ultimately responsible for the management and use of personal data. The Society of Friends of Christ College is an unincorporated charitable organisation (registered number 525272). As a charity the Trustees are ultimately responsible for the activities of the organisation. The charity is part of the Christ College legal entity and broadly operates as a subsidiary of the school, sharing administration, insurance and other professional services with it. The school and its other subsidiaries have distinct objectives and have their own privacy notices. In our case, the school's privacy notice takes precedence as the school has exclusive control over most personal data.

The Trustees therefore determine data protection policies and entrust the operational use of personal data to the school and its designated employees who are, for the purposes of data protection law, defined as the data processors. The administration of personal data and compliance with prevailing data protection legislation and the SOFCC's data protection policies is delegated by the data controller to the data processors although ultimate responsibility for ensuring compliance lies with the data controller.

Public bodies are required to appoint a Data Protection Officer (DPO) who is defined in statute and is afforded specific duties and protections. Christ College is an independent school and therefore not required to appoint a DPO. Never the less the governors feel that protection of personal data is so important that it has decided to appoint a person to ensure that this information is properly protected and used. This compliance officer (which we have called "The Privacy and Compliance Officer") is not intended to fulfil the DPO role although he/she will enjoy some of the DPO's statutory powers and protections so that their duties may be effectively carried out.

WHAT THIS POLICY IS FOR

This policy is intended to provide information about how the SOFCC will use (or "process") personal data about individuals including current, past and present parents, carers or guardians (referred to in this policy as "parents").

This information is provided in accordance with the rights of individuals under Data Protection Law to understand how their data is used. Parents are encouraged to read this Privacy Notice and understand the SOFCC's obligations to the SOFCC community.

This **Privacy Notice** applies alongside any other information the SOFCC may provide about a particular use of personal data, for example when collecting data via an online or paper form, such as Gift Aid declarations.

Anyone who acts on behalf of, the SOFCC (including volunteers and service providers) should also be aware of and comply with this Privacy Policy.

RESPONSIBILITY FOR DATA PROTECTION

- The school group which includes incorporated and associated bodies such as the SOFCC has appointed the IT and Information Manager as Privacy and Compliance Officer who will deal with all your requests and enquiries concerning the school's and the SOFCC's uses of your personal data (see section on Your Rights below) and endeavour to ensure that all personal data is processed in compliance with this policy and Data Protection Law.

Laurence Jones, Data Protection Compliance Officer, Christ College, Brecon LD3 8AF

Email Laurence.Jones@christcollegebrecon.com

Tel: 01874 615440

WHY THE SOFCC NEEDS TO PROCESS PERSONAL DATA

In order to carry out its ordinary fundraising and grant making activities, the SOFCC may require the use of personal data about individuals (including current, past and prospective parents) as part of its daily operation.

The school and the SOFCC have agreed that all personal data shall be held, controlled and protected by the school's staff alone. The only current exception to this is the collecting of Gift Aid mandate forms which we are required by HMRC to record and to submit limited personal details of those allowing Gift Aid to be reclaimed on their behalf.

Other uses of personal data will be made in accordance with the SOFCC's legitimate interests, or the legitimate interests of another, provided that these are not outweighed by the impact on individuals, and provided it does not involve special or sensitive types of data.

The SOFCC expects that the following uses may fall within that category of its “**legitimate interests**”:

- Maintaining relationships with the SOFCC community, including direct marketing or fundraising activity. These activities will be carried out by the school on behalf of the SOFCC so that the SOFCC does not handle any personal data;
- For the purposes of due diligence where required due to the exceptional size of a proposed donation, and to confirm the identity of such prospective donors and their background and relevant interests;
- Where otherwise reasonably necessary for the SOFCC's purposes, including to obtain appropriate professional advice or insurance for the SOFCC, although this is currently all managed by the school.

TYPES OF PERSONAL DATA PROCESSED BY THE SOFCC

This will include for Gift Aid purposes only:

- names and addresses;
- amount and frequency of donations going back up to four years.

HOW THE SOFCC COLLECTS DATA

The SOFCC only receives Gift Aid personal data from the school following the voluntary completion of a Gift Aid mandate form. These forms are distributed by the school and the SOFCC has no access to the database of parents.

WHO HAS ACCESS TO PERSONAL DATA AND WHO THE SOFCC SHARES IT WITH

The SOFCC will need to share personal information relating to its donors in an annual return to the HMRC for the completion of our Gift Aid submission. In exceptional circumstances we could be required to share data with other agencies such as professional advisers (lawyers and accountants) or relevant authorities (HMRC, police or the local authority). It is anticipated that this would be an extremely rare event given that the school has access to all data.

For the most part, personal data held by the SOFCC will remain within the SOFCC and the school, and will be processed by appropriate individuals (such as the Treasurer) only in accordance with access protocols (i.e. on a ‘need to know’ basis)

HOW LONG WE KEEP PERSONAL DATA

The SOFCC will retain personal data securely and only in line with how long it is necessary to keep for a legitimate and lawful reason. Typically, the legal recommendation for how long to keep HMRC records is up to 7 years following any claims. If you have any specific queries about how this policy is applied or wish to request that personal data that you no longer believe to be relevant is considered for erasure, please contact Mr Laurence Jones (contact details above). However, please bear in mind that the SOFCC may have lawful and necessary reasons to hold on to some data.

KEEPING IN TOUCH AND SUPPORTING THE SOFCC

The SOFCC and/or any relevant other organisation will use the contact details of parents, alumni and other members of the SOFCC community to keep them updated about the activities of the SOFCC, or alumni and parent events of interest, including by sending updates and newsletters, by email and by post. The data processing and distribution of such communication will be handled entirely by the school with the SOFCC not having direct access to any personal data.

Should you wish to limit or object to such use, or would like further information about it, please contact Laurence Jones in writing. You always have the right to withdraw consent, where given, or otherwise object to direct marketing or fundraising. However, the school may need nonetheless to retain some of your details (not least to ensure that no more communications are sent to that particular address, email or telephone number).

YOUR RIGHTS

Individuals have various rights under Data Protection Law to access and understand personal data about them held by the SOFCC, and in some cases ask for it to be erased or amended or for the SOFCC to stop processing it, but subject to certain exemptions and limitations.

Any individual wishing to access or amend their personal data, or wishing it to be transferred to another person or organisation, should put their request in writing to Mr Laurence Jones.

The SOFCC will endeavour to respond to any such written requests as soon as is reasonably practicable and in any event within statutory time-limits, which is one month in the case of requests for access to information. The SOFCC will be better able to respond quickly to smaller, targeted requests for information. If the request is manifestly excessive or similar to previous requests, the SOFCC may ask you to reconsider, but only where Data Protection Law allows it.

You should be aware that certain data is exempt from the right of access. This may include information which identifies other individuals, or information which is subject to legal professional privilege

Where the SOFCC is relying on consent as a means to process personal data, any person may withdraw this consent at any time. Please be aware however that the SOFCC may have another lawful reason to process the personal data in question even without your consent.

That reason will usually have been asserted under this Privacy Notice or may otherwise exist under some form of contract or agreement with the individual.

DATA ACCURACY AND SECURITY

The SOFCC will endeavour to ensure that all personal data held in relation to an individual is as up to date and accurate as possible. Individuals must please notify the SOFCC Treasurer of any changes to information held about them.

An individual has the right to request that any inaccurate or out-of-date information about them is erased or corrected (subject to certain exemptions and limitations under Act).

The SOFCC will take appropriate technical and organisational steps to ensure the security of personal data about individuals, including policies around use of technology and devices, and access to SOFCC data. The SOFCC will utilise the professional services of school staff to fulfil these responsibilities. All Trustees will be made aware of this policy and their duties under Data Protection Law.

QUERIES AND COMPLAINTS

Any comments or queries on this policy should be directed to the SOFCC Treasurer using the school's general contact details.

If an individual believes that the SOFCC has not complied with this policy or acted otherwise than in accordance with Data Protection Law, they should utilise the school's complaints procedure and should also notify the SOFCC Treasurer. The SOFCC can also make a referral to or lodge a complaint with the Information Commissioner's Office (ICO), although the ICO recommends that steps are taken to resolve the matter with the SOFCC before involving the regulator.

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