



Woodbridge Primary School

Third Party Privacy Policy

Approved by Governors	Summer 2023
Next review due	Summer 2024

Signed by:

A handwritten signature in black ink, appearing to read "C. Hopkins".

Dr Colin Hopkins

Chair of Governors

Signed by:

A handwritten signature in black ink, appearing to read "P. Wake".

Mrs Pippa Wake

Headteacher

Woodbridge Primary School's Third Party Privacy Notice

This Privacy Notice is designed to help third parties understand how and why the School processes your personal information and what we do with that information. It also explains the decisions you can make about your own information.

Who We Are

Under Data Protection legislation, the school is a data controller.

The contact details for the school are as follows:

Headteacher – office@woodbridgeprimary.suffolk.sch.uk

Our Data Protection Officer

The school's data protection officer is:

Headteacher – office@woodbridgeprimary.suffolk.sch.uk

What is 'Personal Data'?

Personal data is information that we hold about you and which identifies you. This includes information such as your name, telephone number, nationality, address, medical details, financial information and your photograph (including that processed by CCTV). We may also hold information such as your religion or ethnic group. Vehicle details for those authorised to use the School car parks also count as personal data.

How and why do we collect and use your personal data?

The School collects most of its third party personal data directly from:

- Employees of supplier companies
- Contractors
- Visitors
- Guardians
- Those providing a service to the School.

Why does the School process third party personal data?

The School needs to process third party personal data for a number of reasons, which include:

- To enable the School to run properly and safely
- To administer and maintain pupil records
- To provide educational, career and alumni services to pupils
- To provide educational assistance (such as learning support)
- To maintain records as required by law (such as health and safety records, insurance records, financial records, statutory reporting records and abide by UK Visa and Immigration requirements)
- To keep interested parties notified about relevant matters relating to the School (such as sports fixtures, exam results, performances and events, guest speakers or other news)
- To market and promote the School and its facilities
- To provide an academic reference or exam results (to another educational provider, UCAS or an employer)
- To provide pastoral care and safeguard pupil and staff welfare
- To organise extra-curricular trips, work experience or activities
- To obtain professional advice and insurance
- To ensure site security (e.g. through use of CCTV).

What personal data does the School process?

Examples of the types of personal data from third parties that the School processes include:

- Contact details such as name, email address, telephone number
- Car registration details if on School premises
- Identification documents will be viewed if visiting the School
- Photographic images, for example through use of CCTV on School site
- Bank details if applicable.

Who might your personal data be shared with?

The majority of your personal data collected will remain with the School and only used by the people who need to know the information. However there are some

instances where the School will need to share your personal data with other parties, for example:

- Local authorities and other public authorities
- Independent school bodies such as the Independent Schools Inspectorate (ISI) and the Independent Schools Council (ISC)
- Health professionals
- The School's professional advisors as appropriate.

We will only share your information with other people or organisations when we have a good reason to do so and where the School is assured that your data will be kept securely. In exceptional circumstances, we may need to share it more widely than we would normally.

Sharing data outside the UK

We may send your information to countries which do not have the same level of protection for personal information as there is in the EU. For example, we may communicate with you by email when you are overseas.

The European Commission has produced a list of countries which have adequate data protection rules and therefore do not need further safeguards in place. The list is available here:

https://ec.europa.eu/info/law/law-topic/data-protection/data-transfers-outside-eu/adequacy-protection-personal-data-non-eu-countries_en#dataprotectionincountriesoutsidetheeu.

If the country that we send your information to is not on the list or is not a country within the European Economic Area (which means countries in the EU, Liechtenstein, Norway and Iceland), then it might not have the same level of protection for personal information as there is in the UK. If the School is aware of any data that it intends on sending to countries without adequate data protection, we will inform you.

Our legal grounds for using your personal data

The information below contains the legal grounds in which we rely on to handle your personal data.

- For the School's legitimate interests, such as providing education, providing a safe and secure environment, advertising and improving the School, enabling us to enforce our rights, monitoring appropriate use of School IT and

communications systems and facilitating the effective operation of the School. Your personal information may also be used for the legitimate interests of others, such as another school.

- Where it is necessary in order to perform our obligations under a contract with you.
- For a legal obligation, such as reporting a concern to Children's Services, or disclosing your data to third parties such as the Police and Local Authority where we are legally obliged to do so.
- For your or someone else's vital interests, for example in an extreme emergency.
- For the public interest, for example safeguarding and promoting the welfare of children, facilitating the effective operation of the School and for providing education services.

There are special categories of your personal data that need to be treated particularly sensitively and the School therefore has to further justify why it may need to use such data. These data types include racial or ethnic origin, political opinions, religious or philosophical beliefs, genetic, biometric and health information, sex life or sexual orientation, as well as criminal information. Our justifications for processing these types of data, where applicable, are:

- You have given **explicit consent**;
- To protect yours or someone else's **vital interests**;
- You have already made the data **manifestly public**;
- For the purposes of a **legal claim**;
- There is a **substantial public interest**;
- For the **provision of health or social care** or treatment.

Consent

On some occasions the School may ask for your consent to use your personal data. You may take back this consent at any **time**. However, any use the School has made of your information before you withdraw your consent will still be valid.

Please note that there are some circumstances where the School will not be able to accept your request for consent withdrawal as we may be relying on another justification for processing your data.

Your Rights

Individuals have a number of rights under Data Protection law which you can exercise. These include:

- If the data we have on you is incorrect, you can ask us to correct it;
- You can ask us to delete the information we hold on you in certain circumstances, such as when we no longer need the information;
- You can ask what information we hold about you and be provided with a copy. We will also give you extra information, such as why we use the information, where it came from and what types of people/organisations it has been sent to;
- You can ask the School to restrict the use of your information where it is inaccurate, unlawful, no longer needed or where your right to object is apparent. This will be balanced with the School's legitimate interests for using the data;
- You can ask the School to send you or another organisation certain types of information about you in a machine-readable format.

How long do we keep your personal data for?

The School will keep your data for as long as it needs according to the purpose for processing. In some circumstances, such as for safeguarding, we will keep the information indefinitely.

For more information on retention of your personal data please refer to our retention schedule which sets out how long we keep information about pupils (Information and Records Management Society's toolkit for schools).

Contact

If you have any questions or concerns about the information in this Notice or your rights, you can contact the School using the details above. Alternatively, if you are still not satisfied with the way the School has handled your personal data, you can contact the Information Commissioner's Office on 0303 123 1113. For more information, please see <https://ico.org.uk/concerns/>.