

## Privacy Notice for Third Parties

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### INTRODUCTION

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

This Notice should be read in conjunction with St Faith's ("the School") Data Protection Policy, available on the School website.

### DEFINITIONS

In this Policy, the following definitions apply:

*"Data Protection Legislation"* means (i) the General Data Protection Regulation (EU) 2016/679 ("GDPR") and any national implementing laws, regulations and secondary legislation, as amended or updated from time to time, in the United Kingdom and (ii) any successor legislation to the GDPR.

*"Data controller", "data subject", "personal data" and "processing"* shall have the same meanings as in the Data Protection Legislation.

*"Special categories of personal data"* shall have the same meaning as in the Data Protection Legislation, namely personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, genetic data, biometric data, data concerning health or data concerning a person's sex life or sexual orientation.

*"Third party personal data" or "your personal data"* means the personal data of visitors to the School, employees, contractors and workers of third party businesses who attend the School for any purpose and any other individual who is providing a service to the School.

### ABOUT ST FAITH'S

Nature of Work: Independent School

Under current Data Protection Legislation, the School is a Data Controller.

ICO Registration Number: Z976867X

Date Registered: 12 February 2007 Registration Expires: 11 February 2019

The contact details for the school are as follows:

St Faith's School  
Trumpington Road  
Cambridge  
CB2 8AG

## **RESPONSIBILITY FOR DATA PROTECTION**

The School has appointed Amy Pearson, Operations Manager, as the School's Data Compliance Officer who will deal with all your requests and enquiries concerning the School's uses of your personal data and endeavour to ensure that all personal data is processed in compliance with this privacy notice and the Data Protection Legislation .

The Data Compliance Officer can be contacted as follows:

Email: [GDPR@stfaiths.co.uk](mailto:GDPR@stfaiths.co.uk)

Telephone: 01223 229443

Address: St Faith's School, Trumpington Road, Cambridge CB2 8AG

## **HOW DOES THE SCHOOL COLLECT THIRD PARTY PERSONAL DATA?**

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

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

## **WHAT PERSONAL DATA DOES THE SCHOOL HOLD?**

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 parking on the School premises
- Photograph required for ID purposes when on site
- Identification documents will be viewed if visiting the School
- Photographic images through use of CCTV on School site
- Bank details if applicable.

## OUR LEGAL GROUNDS FOR USING YOUR PERSONAL DATA

We rely on the following legal bases for processing your personal data:

- Where it is necessary for the purposes of 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.
- Where it is necessary for compliance with a **legal obligation** to which the School is subject, 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.
- Where it is necessary in order to protect your or someone else's **vital interests**, for example in an extreme emergency.
- Where it is necessary for the performance of a task carried out in the **public interest**, for example safeguarding and promoting the welfare of children, facilitating the effective operation of the School and for providing education services.

Special categories of personal data need to be treated particularly sensitively and the School therefore has to further justify why it may need to use such data.

Our lawful bases for processing these types of data, where applicable, are:

- Where you have given **explicit consent**;
- Where it is necessary to protect yours or someone else's **vital interests**;
- Where you have already made the data **manifestly public**;
- Where it is necessary for the purposes of establishing or defending a **legal claim**;
- Where there is a **substantial public interest**;
- Where it is necessary for the **provision of health or social care** or treatment.

## 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 UKVI 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 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 and Inventory).

## **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 withdrawal of consent and we may rely on another justification for processing your personal data. We will inform you if this is the case when responding to your withdrawal of consent.

## **WHO MIGHT YOUR PERSONAL DATA BE SHARED WITH?**

Usually, your personal data will remain within the School and only be 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. These parties might include:

- 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, and we will notify you if that is likely to be the case.

## **TRANSFERRING 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 UK. For example, we may communicate with you by email when you are overseas. If this is the case, we will only transfer your personal data in this way because it is necessary for the performance of the Schools' contract with you.

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](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.

If you have any questions in relation to the transferring of data to other countries please contact the Data Compliance Officer.

## **YOUR RIGHTS**

Individuals have a number of rights under Data Protection Legislation which you can exercise in certain circumstances. 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, for example 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 you have exercised your right to object;
- You can ask the School to send you or another organisation certain types of information about you in a commonly used machine-readable format.

## **HOW LONG DO WE KEEP PERSONAL DATA FOR?**

The School will keep your personal data for as long as it needs to 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 the School's Data Retention Policy, available on the School website.

## **THIS PRIVACY NOTICE**

The School will update this Privacy Notice from time to time. Any substantial changes that affect your rights will be notified to you directly as far as is reasonably practicable.

## **QUERIES AND COMPLAINTS**

Any comments, queries or complaints in relation to this privacy notice should be directed to the School's Data Compliance Officer using the following contact details:

Email: [GDPR@stfaiths.co.uk](mailto:GDPR@stfaiths.co.uk)

Telephone: 01223 229443

Address: St Faith's School, Trumpington Road, CAMBRIDGE CB2 8AG

Alternatively, you can contact the Information Commissioner's Office (ICO) at <https://ico.org.uk/concerns/> or on 0303 123 1113 although the ICO recommends that steps are taken to resolve the matter with the School before involving the regulator.