



PRIVACY NOTICE FOR THIRD PARTIES

Introduction

The Leys School and St Faith's School (together part of The Leys and St Faith's Schools Foundation and referred to in this Privacy Notice as "the Schools") collect and process personal data relating to third parties in order to successfully carry out their functions.

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

This Notice should be read in conjunction with the Schools' Data Protection Policy, available on the Schools' respective websites.

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" and "processing" shall have the same meanings as in the Data Protection Legislation.

"Personal data" means information that we hold about you and which identifies you. This includes information such as your name, date of birth, nationality, address, next of kin, occupation, dietary and medical details, your photograph (including that processed by CCTV) and vehicle details for those authorised to use the Schools' car parks.

"Special categories of personal data" means 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.

About The Leys and St Faith's

Under Data Protection law, the Schools are Data Controllers. The contact details for the Schools are as follows:

The Leys School, Trumpington Road, Cambridge, CB2 7AD
Person responsible for data protection: Miss Gabriella Cox

Email: compliance@theleys.net

Telephone: 01223 518847

St Faith's School, Judicium Consulting Limited, 72 Cannon Street, London, EC4N 6AE

Person responsible for data protection: Judicium Consulting Limited

Email: dataservices@judicium.com

Telephone: 0203 326 9174

If you have any queries in relation to this Privacy Notice, please use the contact details above.

How does the School collect third party personal data?

The Schools collect most of their third party personal data directly from:

- Employees of supplier companies;
- Emergency contacts for individuals connected with parents/pupils of the Schools;
- Contractors;
- Visitors;
- Letting groups;
- Members and prospective members of Leys Leisure;
- Those undertaking a course at The Leys such as Lifeguarding or First Aid;
- Those booking tickets for performances and events; and
- Those providing a service to either School.

What third party personal data do the Schools process?

Examples of the types of personal data from third parties that the Schools process include:

- Contact details such as name, email address, telephone number;
- Company name if applicable;
- Car registration details if on School premises;
- Identification documents will be viewed if visiting either School;
- Photographic images, for example through use of CCTV on School site;
- Bank details if applicable;
- Disclosure Barring Service (DBS) check information; and
- Where applicable, the Schools will process special category data. For example, those applying to use The Leys Sports Centre will be required to provide medical details.

Why do the Schools process third party personal data?

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

- To enable the Schools 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 or additional music lessons);

- To maintain records as required by law (such as health and safety records, insurance records, financial records, statutory reporting records and to abide by UK Visa and Immigration requirements);
- To keep interested parties notified about relevant matters relating to the Schools, such as sports fixtures, exam results, performances and events, guest speakers or other news;
- To market and promote the Schools and their 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; and
- To ensure site security (e.g. through use of CCTV).

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 Schools' **legitimate interests**, such as providing education, providing a safe and secure environment, advertising and improving the Schools, enabling us to enforce our rights, monitoring appropriate use of School IT and communications systems and facilitating the effective operation of the Schools. 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 either 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 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 Schools and for providing education services.

Special categories of your personal data need to be treated particularly sensitively and the Schools therefore have to further justify why they 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 the processing is carried out in the course of our **legitimate activities** where there are **appropriate safeguards** in place;
- 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.

Consent

On some occasions, the Schools may ask for your consent for a specific use of 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 be aware however that the Schools may have a lawful reason for processing an individual's personal data which does not require them to have to obtain the individual's consent.

Who might your personal data be shared with?

Usually, your personal data will remain with the relevant School and only be used by the people who need to know the information. However, there are some instances where the Schools 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 Schools' professional advisors as appropriate; and
- Government bodies such as The Disclosure & Barring Service.

We will only share your personal data with other people or organisations where required and where the Schools are assured that your personal data will be kept securely. In exceptional circumstances, we may need to share it with other parties not listed above. In these circumstances we will notify you.

Transferring personal data outside the UK

We may send your personal data to countries which do not have the same level of protection for personal data 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. 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 personal data 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 data as there is in the UK. We will endeavour to put reasonable safeguards in place.

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 hold about you is incorrect, you can ask us to correct it;
- You can ask us to delete the personal data we hold on you;
- You can ask what personal data we hold about you and be provided with a copy. We will also give you extra information, such as why we use the data, where it came from and what types of people/organisations it has been sent to;
- You can object to the School processing your personal data;
- You can ask the School to restrict the use of your personal data;
- You can ask the School to send you or another organisation certain types of personal data about you in a commonly-used machine-readable format.

How do the Schools protect personal data and ensure its accuracy?

The Schools take the security of your personal data very seriously. They have internal policies and controls in place to ensure that your personal data is not lost, accidentally destroyed, misused or disclosed, and is accessed only by those who need to know the information for the performance of their duties.

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

How long do we keep your personal data for?

The Schools will keep your personal data for as long as they need according to the purpose for processing. In some circumstances, such as for safeguarding, information will be held indefinitely. We may also keep some of your personal data indefinitely for historical research and archiving purposes.

Policy Review

This Privacy Notice will be reviewed annually and where appropriate, amended at any time in accordance with any changes in the law or guidance provided by the Information Commissioner's Office. Where appropriate, the Schools will notify data subjects of those changes by writing (including electronically).

Queries and Complaints

If you have any questions or concerns about the information in this Privacy Notice or your rights, you can contact the School using the details provided 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/>.