

Data Protection Policy

The security and privacy of your data is taken seriously by us but we need to gather and use information or 'data' about you to support the effective running of the Parents, Teachers & Friends Association (PTFA) and to manage our relationship with you. We are committed to complying with all our Data Protection legal obligations.

This policy applies to all PTFA volunteers and parents. If you fall into one of these categories then you are a 'data subject' for the purposes of this policy. You should read this policy alongside our Privacy Notice we issue to you from time to time in relation to your data.

The PTFA has separate policies and privacy notices in place a copy of these can be obtained from the person for responsible for Data in the association.

The PTFA has taken steps to protect the security of your data in accordance with our PTFA GDPR document and will train staff about their data protection responsibilities. We will only hold data for as long as necessary for the purposes for which we collected it.

The PTFA is a 'data controller' for the purposes of your personal data. This means that we determine the purpose and means of the processing of your personal data.

This policy explains how the PTFA will hold and process your information. It explains your rights as a data subject. It also explains your obligations when obtaining, handling, processing or storing personal data in the course of PTFA activities.

Data Protection Principles

Personal data must be processed in accordance with six 'Data Protection Principles.' It must:

- be processed fairly, lawfully and transparently;
- be collected and processed only for specified, explicit and legitimate purposes;
- be adequate, relevant and limited to what is necessary for the purposes for which it is processed;
- be accurate and kept up to date. Any inaccurate data must be deleted or rectified without delay;
- not be kept for longer than is necessary for the purposes for which it is processed and for a maximum of 8 years;
- be processed securely.

We are accountable for these principles and must be able to show that we are compliant.

How we define personal data

'Personal data' means information which relates to a living person who can be **identified** from that data (a 'data subject') on its own, or when taken together with other information which is likely to come into our possession. It includes any expression of opinion about the person and an indication of the intentions of us or others, in respect of that person. It does not include anonymised data.

This policy applies to all personal data provided by you, whether it is stored electronically, on paper or on other materials.

The types of personal data we collect and use about you is included in the Privacy Notice that is available.

The PTFA will not hold any special category of personal data.

How we define processing

'Processing' means any operation which is performed on personal data such as:

- collection, recording, organisation, structuring or storage;
- adaption or alteration;
- retrieval, consultation or use;
- disclosure by transmission, dissemination or otherwise making available;
- alignment or combination; and
- restriction, destruction or erasure.

This includes processing personal data which forms part of a filing system and any automated processing.

How will we process your personal data?

The PTFA will process your personal data and will use your personal data for:

- asking for volunteers for events;
- informing you of future PTFA events
- informing you and updating you on the 50/50 Club;
- complying with any legal obligation; or
- if it is necessary for our legitimate interests (or for the legitimate interests of someone else). However, we can only do this if your interests and rights do not override ours (or theirs). You have the right to challenge our legitimate interests and request that we stop this processing.

We can process your personal data for these purposes without your knowledge or consent. We will not use your personal data for an unrelated purpose without telling you about it and the legal basis that we intend to rely on for processing it.

Examples of when we might process your personal data can be found in the Privacy Notice. You can withdraw consent later if you choose by contacting the person responsible for Data in the PTFA.

We do not take automated decisions about you using your personal data or use profiling in relation to you.

Sharing your personal data

The PTFA will not share your personal data with any group.

We do not send your personal data outside the European Economic Area. If this changes you will be notified of this and the protections which are in place to protect the security of your data will be explained.

How should you process personal data for the PTFA?

Everyone who is part of the PTFA has some responsibility for ensuring data is collected, stored, erased and handled appropriately, in line with the PTFA GDPR document.

The PTFA committee is responsible for reviewing this policy on data protection responsibilities and any risks in relation to the processing of data. You should direct any questions in relation to this policy or data protection to the PTFA and address any written requests to them.

You should only access personal data covered by this policy if you need it for the work you do for, or on behalf of the PTFA and only if you are authorised to do so. You should only use the data for the specified lawful purpose for which it was obtained.

- You should not share personal data informally.
- You should keep personal data secure and not share it with unauthorised people.
- You should regularly review and update personal data which you have to deal with for work. This includes telling us if your own contact details change.
- Data should be reviewed annually to ensure it is compliant.
- You should not make unnecessary copies of personal data and should keep and dispose of any copies securely.
- You should use strong passwords.
- You should lock your computer screens when not at your desk.
- Consider anonymising data or using separate keys/codes so that the data subject cannot be identified.
- Personal data should never be transferred outside the European Economic Area except in compliance with the law and authorisation of the person for responsible for Data in the PTFA.
- You should lock drawers and filing cabinets. Do not leave paper with personal data lying about.
- You should not take personal data away without authorisation from the person for responsible for Data in the PTFA.
- Personal data should be shredded and disposed of securely when you have finished with it.
- You should ask for help from the PTFA committee if you are unsure about data protection or if you notice any areas of data protection or security we can improve upon.
- Any deliberate or negligent breach of this policy by you may result in disciplinary action being taken against you.
- It is a criminal offence to conceal or destroy personal data which is part of a subject access request (see below). This conduct would also amount to gross misconduct under our disciplinary procedure, which could result in your dismissal.

How to deal with data breaches

We have robust measures in place to minimise and prevent data breaches from taking place. Should a breach of personal data occur (whether in respect of you or someone else) then we must take notes and keep evidence of that breach. If the breach is likely to result in a risk to the rights and freedoms of individuals, then we must also notify the Information Commissioner's Office within 72 hours.

If you are aware of a data breach you must contact the person responsible for Data immediately and keep any evidence you have in relation to the breach. The Data Breach procedure should be followed.

Subject Access request

Data subjects can make a 'data **subject access request**' ('DSAR') to find out the information we hold about them. This request must be made in writing. If you receive such a request, you should forward it immediately to the person for responsible for Data in the PTFA who will coordinate a response.

We must respond within one month unless the request is complex or numerous in which case the period in which we must respond can be extended by a further two months.

There is no fee for making a DSAR. However, if the request is manifestly unfounded or excessive we may charge a reasonable administrative fee or refuse to respond to your request.

Your data subject rights

- You have the right to information about what personal data we process, how and on what basis as set out in this policy.
- You have the right to access your own personal data by way of a subject access request (see above).
- You can correct any inaccuracies in your personal data. To do so you should contact the person responsible for Data in the PTFA.
- You have the right to request that we erase your personal data where we were not entitled under the law to process it or it is no longer necessary to process it for the purpose it was collected. To do so you should contact the person responsible for Data in the PTFA.
- While you are requesting that your personal data is corrected or erased or are contesting the lawfulness of our processing, you can apply for its use to be restricted while the application is made. To do so you should contact the person responsible for Data in the PTFA.
- You have the right to object to data processing where we are relying on a legitimate interest to do so and you think that your rights and interests outweigh our own and you wish us to stop.
- You have the right to object if we process your personal data for the purposes of direct marketing.
- You have the right to receive a copy of your personal data and to transfer your personal data to another data controller. We will not charge for this and will in most cases aim to do this within one month.
- With some exceptions, you have the right not to be subjected to automated decision-making.
- You have the right to be notified of a data security breach concerning your personal data, in line with our Data Breach Notification procedure.
- You have the right not to consent or to withdraw your consent later. To withdraw your consent, you should contact the person responsible for Data in the PTFA.
- You have the right to complain to the Information Commissioner. You can do this by contacting the Information Commissioner's Office directly. Full contact details including a helpline number can be found on the Information Commissioner's Office website (www.ico.org.uk). This website has further information on your rights and our obligations.