

BRYANSTON

PRIVACY NOTICE OVERVIEW

This **Privacy Notice** is structured in two parts:

- Part A** Is applicable to all people who interact with and provide Personal Data to Bryanston in any capacity and should be read by everyone.
- Part B** Has additional provisions and comes in different versions depending on who you are and the reason for your dealings with Bryanston. These are:
- **Pupils** and their **Parents** or **Guardians** (prospective, current and past) and **Alumni**
 - **Employees, Governors** and **Volunteers** (prospective, current and past)
 - **General Visitors** to our website and or premises and **Customers** or **Users** of Bryanston Conference Centre services

Suppliers of Goods and Services to Bryanston will have Privacy & Data Protection provisions within or as an addendum to the applicable contract.

PART A

About Bryanston School and Bryanston Conference Centre

Bryanston School Incorporated is a registered company (Co. No. 00226143) and a registered charity (Ch. No. 306210)

Bryanston Conference Centre Limited is a registered company (Co. No. 01111950)

Both of the United Kingdom, registered address Bryanston House, Blandford, Dorset, DT11 0PX.

The **Data Protection Officer** for both organisations can be contacted by post at the address above or by: Tel: + 44 (0) 1258 452411 or email: dpo@bryanston.co.uk

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Reviewer: G7
Next Review: May 2019
Author: Data Protection Officer



This Notice describes how Bryanston School Incorporated and Bryanston Conference Centre Limited (“**Bryanston**”) will collect, use, share, store and dispose of information (or **Personal Data**) that we learn about you from:

- Visits to our website at www.bryanston.co.uk
- You completing our enquiry, registration and application forms:
 - a) for your child to attend the school;
 - b) for employment or voluntary work at the school;
 - c) to become a school governor;
 - d) to join the school’s Alumni Association and/or to assist with the school’s charitable aims;
 - e) to order and pay for goods and services such as payments to attend social events, conferences, theatre, art or music performances or sports activities and use of our facilities.
- Data will be collected from electronic systems used within the School for the purpose of safeguarding.
- Bryanston Site Security systems including CCTV video and images and ANPR (Automatic Number Plate Recognition) when you visit our premises. These are for the purposes of: maintaining the security and management of the premises and facilities, prevention and investigation of crime, to promote good behaviour and adherence to the school rules and personal safety of children, staff and visitors. Imagery media is stored securely for a maximum period of one month unless it is required for investigation or prevention of criminal activity. Signage related to the CCTV and ANPR systems will make reference to this Privacy Policy.

Under the terminology of Data Protection Legislation this means that Bryanston is the **Data Controller** and you are the **Data Subject**. The act of Bryanston; obtaining, storing, using, sharing and erasing your Personal Data is termed **Data Processing**.

In most instances this Privacy Notice will be provided to you when your Personal Data is obtained from you. Where your Personal Data is obtained from other sources we will tell you without undue delay what Personal Data has been obtained and where it came from, as well as referencing this Privacy Policy.

There is no automated decision making or profiling involved in Personal Data entering the School except, limited home post code analysis of joining pupils to allow for geographical targeted advertising.

Why We hold your Personal Data

We can only process your Personal Data for a specific purpose or purposes agreed by you or, as allowed or as required by the law. This is called the **Legal Basis of Processing**. Once those purposes are complete we will no longer process your Personal Data.

We will only process Personal Data and allow access to it as is strictly necessary to fulfil the purposes.

Depending on the purpose, it may be necessary for us to process some Personal Data that is particularly sensitive and therefore requires greater protection and an additional Legal Basis of Processing and in most circumstances, your express permission or consent. This kind of Personal Data is called **Special Category Personal Data** and includes: For example, information about an individual’s:

- race; ethnic origin; political allegiance; religion; trade union membership; genetics; biometrics (where used for ID purposes); health; sex life; or sexual orientation. We also treat the use of pupil images and media and Disclosure & Disbarring Checks (DBS) for our employees, volunteers and regular visiting contractors in the same way.

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Again, depending on the purpose we may need to share your Personal Data with other parties so that they can process your Personal Data on our behalf. In this case we will ensure that our contract with the relevant party requires that your Personal Data is processed by them in accordance with the law. Additionally, if that party is not based within the European Economic Union we will tell you.

In other cases, we will be compelled to provide your Personal Data by law for example to law enforcement and local authorities or the Inland Revenue. In these circumstances you won't always be told but we will where we are allowed to do so.

Your Personal Data Rights

The Data Protection Legislation gives you clear rights about your Personal Data that we hold and this includes providing you with the information in this Privacy Notice. It also gives you the following rights:

- The right to have any inaccurate or out of date Personal Data used by us corrected and therefore up to date. In this regard, it is helpful if the Data Subject informs the School as soon as possible if there has been a change, (especially in relation to contact details such as address, e-mail, telephone numbers etc.) in order that the School can ensure your Personal Data is as accurate as possible.
- Where we are relying on your consent to process your Personal Data you have the right to withdraw that consent in part or completely at any time. We will then cease (or take all necessary steps to cease) the processing immediately (or without undue delay) although there may be a lawful reason as to why this may not be possible. If this is the case we will tell you.
- The conditional right to know what Personal Data is being held by us, where it came from, for what purpose it is being used and who else might receive it. This right is known as a **Subject Access Request** or SAR. This right is conditional because there are some limitations and exceptions prescribed by law. 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. The School is also not required to disclose any pupil examination scripts (though examiners' comments may fall to be disclosed), nor any confidential reference given by the school for the purposes of the education, training or employment of any individual. We must respond to a legitimate SAR within one calendar month. The school 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 School may ask you to reconsider or charge a proportionate fee, but only where Data Protection Law allows it.
- The conditional right to request that we cease all or some of the processing of your Personal Data without undue delay and that we provide you with a copy of your Personal Data in a standard, portable format.
- The right to be informed if we use any automation in the processing of your Personal Data and your right to challenge any resulting decision.
- The right to lodge a complaint with the Supervisory Authority (see details below).
- If the Personal Data did not originate from you, it is likely to have come from other sources e.g. (but not limited to) current or previous schools, current or previous employers, information we obtained when you attended or worked at the school, the Inland Revenue, references provided to us. Data provided to the School in this regard can contain not only personal data but Special Category Data for example health information.
- There may be instances where if you fail to provide Personal Data certain actions/events etc may not be able to take place (e.g. failure to provide payment details for an event or service or banking details so that you can be paid a salary.)

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Our Obligations in relation to your Personal Data

We have clear obligations on how we handle your Personal Data and these include:

- only collecting and processing your Personal Data that is necessary for the purpose in which is intended;
- to only allow others access to the Personal Data who need it to fulfil the purpose and for only as long as is necessary;
- to keep your Personal Data safe and secure using reasonable technical and organisational measures and by robust contractual provisions replicating the requirements of this Privacy Notice where it is necessary for third parties to process your Personal Data for the purpose;
- to notify you without undue delay in the event of accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to Personal Data where it is likely to result in a high risk of adversely affecting you and your rights and freedoms;
- to only keep your Personal Data for as long as is necessary for the purpose to be fulfilled and to securely destroy or erase it. There may be some instances where Personal Data is irreversibly anonymised so that it cannot be linked to an individual and is therefore no longer Personal Data;
- to have data security as a fundamental consideration when we introduce or design new systems or procedures in the processing of Personal Data.

How to raise a Concern or make a Complaint

If you have any questions about the way Bryanston processes your Personal Data or you have a concern or complaint then in the first instance please contact the Data Protection Officer (contact details above)

In the event that you are not satisfied with our response you have the right to make a complaint to the regulator:

The **Information Commissioners Office** through their website <https://ico.org.uk/concerns/> or by telephone 0303 123 111

Monitor and Review

This Privacy Notice will reviewed annually by the person responsible namely the Data Protection Officer whose details are provided above.

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