



## Windlesham School – Privacy Notice and Annexes

The UK General Data Protection Regulation (GDPR) includes rules on giving privacy information to those whose data is held by an organisation (data subjects). These are more detailed and specific than in the Data Protection Act (DPA) and place an emphasis on making privacy notices understandable and accessible. Data controllers are expected to take 'appropriate measures' to ensure that this is the case.

The School interprets this as using very clear language to outline each of the responsibilities for each of the data subject groups.

The GDPR say that the information provided to data subjects about how the School processes their personal data must be:

- concise, transparent, intelligible and easily accessible;
- written in clear and plain language, and provided free of charge. Please be aware that as pupils at Windlesham are all aged below 12, all information is provided to you as their parent/guardian, not direct to the children themselves.

These requirements are about ensuring that privacy information is clear and understandable for data subjects. This privacy notice deals with the overall privacy responsibilities of the School but includes the particular notices that apply to parents of pupils under the age of 13 at the School or applying to join the School. Please read the annexes along with this overarching notice.

Annex A deals with two sources of data, that obtained directly from the subject and, data not obtained directly from the subject. For both sources the identity and contact details of the data handler (and where applicable, the handler's representative) are provided.

The intention is that the privacy notice is a stand-alone document, introduced and covered by the paragraphs above.

NB. This notice is for information only and no action is required from yourselves unless you wish to challenge the use of your data and/or that of your child(ren).

Yours sincerely

Ms Jane Waller, Head of Finance & Operations



## ANNEX A

### Privacy Notice Windlesham School – parents (or guardians) of children at the School, or applying to join the School

This annex should be read in conjunction with the introductory paragraphs in the covering document.

This privacy notice will be provided to you at the time your data is being obtained, if it is being obtained directly. The notice may be issued retrospectively to data subjects for data obtained prior to GDPR implementation on 25<sup>th</sup> May 2018.

Data will be processed for the purposes of responding to requests for information about joining the School and the School will therefore have a “legitimate interest” for processing basic personal data and sensitive personal data. The data the School holds will be the minimum it requires to form and maintain the contract between you and the School.

The School will share your data with the following companies who have contracts with the School and who have equalled the School’s precautions and systems for dealing with data, these are:

- JSPC – provider of technical IT support to the school.
- “Engage” – provider of the School’s Management Information Systems
- Microsoft – using “Teams” software for distance learning
- Innovate Food Group provider of catering services to the school
- Mediabase – our electronic entry system
- “Friends Of Windlesham” – Parent/Carers Association– pupil name plus email only with opt out available
- “Google” – pupil names only - provider of email accounts for pupils to use internally
- Examination Boards – pupil names and dates of birth only
- External Providers of after- school clubs such as tennis and basketball
- External competition organisers EG Swimming Galas
- Providers of Residential Trips.

It is not necessary for data to be shared with other countries. The exception to this will be international trips that the School organises, should this be envisaged for your child, you will be contacted for your consent; the consent will be limited in time and content if it be required.

The retention period for pupil data will be until the pupil reaches the age of 25 if the child enters the School as a pupil and/or be modified by any other legal obligation the School finds itself under.

You have the right to withdraw your consent to data processing at any time, however this will only apply to certain groups of data for which you have given particular consent.

You can complain at any time about how the School has handled your data. The Information Commissioner is available as follows:



ICO helpline is 0303 123 1113. A template letter, should you need it is appended to this notice (Annex B).

We will obtain the data the School requires directly from you, should we need data from other sources we will contact you within a month.

We see the provision of personal data as necessary to properly admit your child to the School and to administer, and for the School to fulfil its obligations under the contract once your child is a pupil here.

There is no automated decision making or profiling involved in this data stream into and through the School.



## ANNEX B

[Your full address]  
[Phone number]  
[The date]

[Name and address of the organisation]  
[Reference number (if provided within the initial response)]

Dear [Sir or Madam / name of the person you have been in contact with]

**Information rights concern**

[Your full name and address and any other details such as account number to help identify you]

I am concerned that you have not handled my personal information properly.

[Give details of your concern, explaining clearly and simply what has happened and, where appropriate, the effect it has had on you.]

I understand that before reporting my concern to the Information Commissioner's Office (ICO) I should give you the chance to deal with it.

If, when I receive your response, I would still like to report my concern to the ICO, I will give them a copy of it to consider.

You can find guidance on your obligations under information rights legislation on the ICO's website ([www.ico.org.uk](http://www.ico.org.uk)) as well as information on their regulatory powers and the action they can take.

Please send a full response within 28 calendar days. If you cannot respond within that timescale, please tell me when you will be able to respond.

If there is anything you would like to discuss, please contact me on the following number [telephone number].

Yours faithfully  
[Signature]