



St Clement's Governor's Fund Privacy Notice

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Contents

| | |
|--|---|
| 1. Introduction | 3 |
| 2. What Personal Data do we hold about you? | 3 |
| 3. How and why do we process your Personal Data? | 3 |
| 4. On what grounds do we process your Personal Data? | 4 |
| 5. Who will we share your information with? | 4 |
| 6. How long will we keep your information for? | 4 |
| 7. Your Rights | 4 |
| 8. Changes to this Notice | 5 |
| 9. Contact Details | 5 |
| 10. Glossary | 6 |



1. Introduction

- 1.1. The Governor's Fund of St Clement's Catholic Primary School (the "**Governor's Fund**") is a charity registered with the Charity Commission in England and Wales. Our charity number is ZD02290 and our registered address is Fennells Mead, West Ewell, KT17 1TX. In this Notice, references to 'we' and 'us' mean the Governor's Fund.
- 1.2. When you provide us with Personal Data in order to administer Gift Aid, we will keep a record of the data you give to us in order to enable us to comply with our statutory obligations and to achieve our charitable objective of providing financial support to St Clement's Catholic Primary School.
- 1.3. For the purpose of the General Data Protection Regulation 2016/679 (GDPR), the Governor's Fund through the members of the Governing Body will be a Data Controller in respect of your Personal Data. In some cases, the Governor's Fund may be a joint Data Controller of your Personal Data (e.g. where your data is shared between the Governor's Fund and another organisation for a particular purpose).
- 1.4. Everyone has rights with regard to how their Personal Data is handled by organisations. The Governing Body is committed to ensuring that Personal Data is properly and securely managed in accordance with the relevant data protection laws, and believes this is an important part of achieving trust and confidence between the School and those with whom it interacts. Please read this Notice to understand how we use and protect the information that you provide to us or that we obtain or hold about you, and to understand what your rights are in relation to information that we hold. This Notice applies to information about living identifiable individuals only.

2. What Personal Data do we hold about you?

- 2.1. We may hold the following types of Personal Data:
- 2.2. name and address details;
- 2.3. financial information (e.g. bank details) and details of any donations you have made to us in the past;
- 2.4. any other information which you choose to provide to us or that we are provided by others.

3. How and why do we process your Personal Data?

- 3.1. The Personal Data which we hold about you, whether it is collected directly from you or whether we receive it from a third party, may be used to process donations that you may make to us and to ensure we meet our legal



obligations when reclaiming Gift Aid from HMRC and to provide you with an annual statement of your donations if you have requested this.

4. On what grounds do we process your Personal Data?

4.1. We must have a lawful basis for Processing your information; this will vary according to the circumstances of how and why we have your information but typical examples include:

4.1.1. to comply with regulations from HMRC (e.g. where we claim Gift Aid on your behalf);

4.1.2. you have given consent (which can be withdrawn at any time by contacting us using the details below) for us to process your information (e.g. to send you an annual statement of your donations);

5. Who will we share your information with?

5.1. We will only use your Personal Data within the School for the purposes for which it was obtained, unless you have explicitly agreed that we may share your Personal Data with another organisation or unless we are otherwise permitted or required to under the Data Protection Rules or order of a Court or other competent regulatory body or as set out in this Notice.

5.2. Sometimes the Governing Body contracts with third parties whom we ask to Process Personal Data on our behalf (e.g. IT consultants). We require these third parties to comply strictly with our instructions and with the GDPR.

5.3. We also may be required to share your Personal Data so that the School can benefit from Gift Aid nominations you have made e.g. with HMRC.

5.4. We have in place administrative, technical and physical measures designed to guard against and minimise the risk of loss, misuse or unauthorised processing or disclosure of the Personal Data that we hold.

6. How long will we keep your information for?

6.1. Your information will be kept in accordance with our Retention & Disposal of Records Policy, copies of which are available from the School Office. In any event, we will endeavour to only keep Personal Data for as long as is necessary and to delete it when it is no longer so.

7. Your Rights

7.1. You have rights in respect of the Personal Data you provide to us. In particular:



- 7.2. the right to request a copy of some or all of the Personal Data that we hold about you. We do not make a charge for this service;
- 7.3. if we Process your Personal Data on the basis that we have your consent, the right to withdraw that consent;
- 7.4. the right to ask that any inaccuracies in your Personal Data are corrected;
- 7.5. the right to have us restrict the Processing of all or part of your Personal Data;
- 7.6. the right to ask that we delete your Personal Data where there is no compelling reason for us to continue to Process it; and
- 7.7. the right not to be subject to legal or other significant decisions being taken about you on the basis of an automated process (i.e. without human intervention).
- 7.8. Please note that the above rights may be limited in some situations – for example, where we can demonstrate that we have a legal requirement to Process your Personal Data. Also, we may need you to provide us with proof of identity for verification and data security purposes before you can exercise your rights.
- 7.9. Rights may only be exercised by the individual whose information is being held by the School or with that individual's express permission.

8. Changes to this Notice

- 8.1. We may make changes to this Notice from time to time as our organisational practices and/or applicable laws change. We will not make any use of your personal information that is inconsistent with the original purpose(s) for which it was collected or obtained (if we intend to do so, we will notify you in advance wherever possible) or otherwise than is permitted by data protection laws.

9. Contact Details

- 9.1. If you have any questions, require further information about how we protect your Personal Data, if you wish to exercise any of the above rights or if you would like to provide feedback or make a complaint about the use of your information, please contact the Chair of Governors via info@stclements.surrey.sch.uk or at the following address: Chair of Governors, Fennells Mead, West Ewell, Surrey, KT17 1TX.
- 9.2. Any complaints will be dealt with in accordance with the School's Complaints Policy.



9.3. We hope that we can satisfy any queries you may have about the way in which we Process your Personal Data. However, if you have unresolved concerns you also have the right to complain to the Information Commissioner ('ICO') (www.ico.org.uk).

10. Glossary

"**Data Controller**" means a person, organisation or body that determines the purposes for which, and the manner in which, any Personal Data is processed. A Data Controller is responsible for complying with the data protection laws including the GDPR and establishing practices and policies in line with them.

"**Data Processor**" means any person, organisation or body that Processes personal data on behalf of and on the instruction of the Governing Body. Data Processors have a duty to protect the information they process by following data protection laws.

"**Data Subject**" means a living individual about whom the Governing Body processes Personal Data and who can be identified from the Personal Data. A Data Subject need not be a UK national or resident. All Data Subjects have legal rights in relation to their Personal Data and the information that the Governing Body holds about them.

"**Personal Data**" means any information relating to a living individual who can be identified from that information or in conjunction with other information which is in, or is likely to come into, the Governing Body's possession. Personal Data can be factual (such as a name, address or date of birth) or it can be an opinion (e.g. a performance appraisal). It can even include a simple email address. A mere mention of someone's name in a document does not necessarily constitute Personal Data, but personal details such as someone's contact details or salary (if it enabled an individual to be identified) would fall within the definition.

"**Processing**" means any activity that involves use of Personal Data. It includes obtaining, recording or holding the information or carrying out any operation or set of operations on it, including organising, amending, retrieving, using, disclosing, erasing or destroying it. Processing also includes transferring or disclosing Personal Data to third parties.