Privacy Notice

Plymouth CAST Multi Academy Trust is the Data Controller for the purposes of the Data Protection Act 1998.

1. OUR DETAILS

We are: Plymouth CAST Multi Academy Trust

Address:

St Boniface House
Ashburton
Newton Abbot
TQ13 7JL

Information Commissioner's Office Registration Number: ZA022556151412019

Our Data Protection Officer is: Matthew Barnes

And their contact details are:

Plymouth CAST
St Boniface House
Ashburton
Newton Abbot
TQ13 7JL

2. USERS OF THE WEBSITE

Plymouth CAST respects your privacy and is committed to protecting your Personal Data. This privacy policy will inform you as to how we look after your Personal Data when you visit this website, (regardless of where you visit them from) or when you otherwise contact us. It will also tell you about your privacy rights and how the law protects you.

References to "**you**" or "**your**" are to you as an individual using our websites or otherwise contacting us.

3. IMPORTANT INFORMATION

It is important that you read this privacy policy together with any other privacy policy or fair processing notice we may provide on specific occasions when we are collecting or processing Personal Data about you so that you are fully aware of how and why we are using your data. This privacy policy supplements the other notices and is not intended to override them.

This version was last updated on 24/05/2018.

Plymouth CAST Multi Academy Trust may change this policy from time to time by updating this page. You should check this page from time to time to ensure that you are happy with any changes.

Our website may contain links to other websites of interest. However, once you have used these links to leave our site, you should note that we do not have any control over that other website. Therefore,

we cannot be responsible for the protection and privacy of any information which you provide whilst visiting such sites and such sites are not governed by this privacy statement. You should exercise caution and look at the privacy statement applicable to the website in question.

4. WHY WE COLLECT DATA

Set out below are the reasons why we collect and process Personal Data:

- To get in touch with you and provide information about the school

5. WHAT DATA WE COLLECT ABOUT YOU

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data) or data relating to a corporate entity.

We may process the following information about you, or your organisation:

- Organisation name, name and job title
- Contact information including email address
- Demographic information such as postcode
- Other information relevant to providing our services

We do not collect any Special Categories of Personal Data (details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, criminal convictions or offences or information about your health, genetic or biometric data).

6. HOW IS YOUR PERSONAL DATA COLLECTED

You may give us your Identity and Contact by filling in forms on our websites or by corresponding with us by post, phone, email or otherwise. This includes Personal Data you provide when you:

- register on our websites;
- contact us using the details provided on our websites;
- contact us by telephone [(where the call may be recorded)];
- give us some feedback.

1. Automated technologies or interactions

As you interact with our website, we may automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this Personal Data by using cookies and other similar technologies.

2. Third parties or publicly available sources

7. LEGAL BASIS FOR PROCESSING DATA

1. Legitimate Interest

This means the interest of our Trust to enable us to give you the best service and the best and most secure experience. We make sure we consider and balance any potential impact on

you (both positive and negative) and your rights before we process your Personal Data for our legitimate interests. We do not use your Personal Data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by contacting us.

1. **Performance of Contract**

   This means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.

2. **Comply with a Legal Obligation**

   This means processing your Personal Data where it is necessary for compliance with a legal obligation that we are subject to.

3. **Public Interest**

   We also process Personal Data where processing is necessary for the performance of tasks carried out in the public interest. It is in the public interest to provide educational services to our pupils and to offer extra-curricular activities such as reading sessions and afterschool clubs to benefit the personal and academic growth of our pupils.

4. **Consent**

   This means agreement which must be freely given, specific, informed and be an unambiguous indication of your wishes by which you, by a statement or by a clear positive action, signify agreement to the processing of Personal Data relating to you. If consent is the only legal basis for processing and has been given then this may be revoked in which case the Personal Data will no longer collected/processed.

8. HOW WE USE YOUR PERSONAL DATA

We will only use your Personal Data when the law allows us to. Most commonly, we will use your Personal Data in the following circumstances:

- Internal record keeping.
- We may use the information to improve our services.
- We may periodically send information which we think you may find interesting using the email address which you have provided.

We will only use your Personal Data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us.

If we need to use your Personal Data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your Personal Data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

9. COOKIES

Our website uses cookies to distinguish you from other users of our website. This helps us to provide you with a good experience when you browse our websites and also allows us to improve our websites.

By continuing to browse our websites, users are agreeing to our use of cookies. To find out more about how we use cookies and for a full list of cookies used, please contact us.

10. SECURITY

We are committed to ensuring that your information is secure. In order to prevent unauthorised access or disclosure we have put in place suitable physical, electronic and managerial procedures to safeguard and secure the information we collect online.

11. DATA RETENTION

We will only retain Personal Data for as long as is necessary to achieve the purposes for which they were originally collected. Records will be kept in accordance with guidance from the Information and Records Management Society. Further information on retention periods can be obtained by contacting us.

Once the retention period concludes the data is securely and safely destroyed/ deleted.

12. YOUR DATA RIGHTS

The General Data Protection Regulation and associated law gives you rights in relation to Personal Data held about you. These are:

- Right to be informed: you have the right to be informed about the collection and use of your data. This policy contains information in relation to the collection of your Personal Data, however, if we collect additional data for other purposes, we will inform you about this.

- Right of Access: if your Personal Data is held by the Trust, you are entitled to access your Personal Data (unless an exception applies) by submitting a written request. We will aim to respond to that request within one month. If responding to your request will take longer than a month, or we consider that an exception applies, then we will let you know.

- Right of Rectification: you have the right to require us to rectify any inaccurate Personal Data we hold about you. You also have the right to have incomplete Personal Data we hold about you completed. If you have any concerns about the accuracy of Personal Data that we hold then please contact us.

- Right to Restriction: you have the right to restrict the manner in which we can process Personal Data where:

    - the accuracy of the Personal Data is being contested by you;

    - the processing of your Personal Data is unlawful, but you do not want the relevant Personal Data to be erased; or

    - we no longer need to process your Personal Data for the agreed purposes, but you want to preserve your Personal Data for the establishment, exercise or defence of legal claims.

  Where any exercise by you of your right to restriction determines that our processing of particular Personal Data are to be restricted, we will then only process the relevant Personal Data in accordance with your consent and, in addition, for storage purposes and for the purpose of legal claims.

- Right to Erasure: you have the right to require we erase your Personal Data which we are processing where one of the following grounds applies:
    - the processing is no longer necessary in relation to the purposes for which your Personal Data were collected or otherwise processed;
    - our processing of your Personal Data is based on your consent, you have subsequently withdrawn that consent and there is no other legal ground we can use to process your Personal Data;
    - the Personal Data have been unlawfully processed; and
    - the erasure is required for compliance with a law to which we are subject.
- Right to Data Portability: you have the right to receive your Personal Data in a format that can be transferred. We will normally supply Personal Data in the form of e-mails or other mainstream software files. If you want to receive your Personal Data which you have provided to us in a structured, commonly used and machine-readable format, please contact us.
- Right to object: you have the right to object to the processing of your Personal Data where one of the following grounds apply:
    - the processing is based on legitimate interests or the performance of a task in the public interest;
    - the processing is for direct marketing; or
    - the processing is for the purposes of scientific/ historical research and statistics.

You can find out more about the way these rights work from the website of the Information Commissioner's Office (ICO).

13. REQUESTING YOUR DATA

You may request details of personal information which we hold about you under the Data Protection Act 1998. If you would like a copy of the information held on you please contact admin@plymouthcast.org.uk

We will aim to respond to your requests within one month. If responding to your request will take longer than a month, or we consider that an exception applies, then we will let you know.

Complaints

We take any complaints about our collection and use of personal information very seriously.

If you think that our collection or use of personal information is unfair, misleading or inappropriate, or have any other concern about our data processing, please raise this with us in the first instance.

To make a complaint, please write to our Data Protection Officer courtesy of the Head Teacher at:

Mrs S Barreto,
Head Teacher,
Our Lady and Saint Patrick's RC Primary School,
Fourth Avenue,
Teignmouth,
Devon,
TQ14 9DT

Alternatively, you can make a complaint to the Information Commissioner's Office:

- Report a concern online at https://ico.org.uk/concerns/
- Call 0303 123 1113
- ICO Email: casework@ico.org.uk
- Or write to: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF

Changes to this notice

Any changes we make to this notice in the future will be posted on our website and, where appropriate, notified to you by e-mail. Please check back frequently to see any updates or changes.

This privacy policy was last updated on 24th May 2018

Contact us

If you have any questions, concerns or would like more information about anything mentioned in this privacy notice, please contact our **Data Protection Officer** courtesy of the Head Teacher at:

Mrs S Barreto,
Head Teacher,
Our Lady and Saint Patrick's RC Primary School,
Fourth Avenue,
Teignmouth,
Devon,
TQ14 9DT

This notice is based on the Department for Education's model privacy notice for the school workforce, amended to reflect the way we use data in this school.