### Privacy Policy

### The Friends of The Charter School North Dulwich (“FOTCSND”) Data Usage Policy

### The FOTCSND is a charity registered with the Charity Commission in England number 1093116, operated by the FOTCSND Committee members (the “Committee”). In summary we operate to support The Charter School in social and fundraising activities (our “Activities”). The FOTCSND is separate and independent from The Charter School.

### Activities

### We are committed to protecting any personal data that we collect concerning you – this is limited to our Activities:

### Administration of FOTCSND – in summary this involves holding the personal contact details of committee members and recording their attendance at meetings, and may involve the recording of individuals who are not Committee but who attend meetings or have offered specific support to administer FOTCSND whether at meetings or otherwise.

### Operation of FOTCSND year WhatsApp groups – holding of personal data is held by WhatsApp in accordance with their Privacy policy which users accept upon downloading the app. FOTCSND does not collect personal data from the year WhatsApp groups which are offered as a “school gates” experience, however users should note that as a forum accessible to other users they should avoid identifying their child’s name, age or other personal information. As regards their own name or details users should not disclose information except to the extent that they are comfortable with other users knowing. FOTCSND make clear that they have no control over the use of information disclosed on year WhatsApp groups by other users and accept no responsibility for the same. The Committee may post information about future events on the year WhatsApp groups. The FOTCSND operates a ‘light touch’ moderation of the year WhatsApp groups only.

### Organising specific events – in summary the contact details of volunteers will be held by members of the Committee and other volunteers involved in organising events. In the nature of volunteering contact details alone may be held after an event has finished in conjunction with brief information about the nature of the volunteering activity undertaken in order to facilitate volunteering at future events. The Committee or volunteers assisting the same may use the contact details in relation to seeking volunteers at future events. The Committee necessarily hold the information of those taking part in each Activity but do not maintain a record of who has taken part in past events as a mere participant (as distinct from volunteering). FOTCSND may use third party event organising platforms in which event their privacy policies should be read in conjunction with this policy.

### Mailing – the Committee communicate about upcoming or proposed Activities with parents of children at The Charter School (in addition to the year WhatsApp groups) via their emailing list managed by the Committee. Mailing is not personalised and contains sufficient information to encourage and support the Activities.

### Specific concerns

### Pupil Details – the Committee avoid holding any pupil details. Parents and carers are asked not to supply the Committee with details of their pupils. If a pupil assists with any Activity then the Committee will track the contact details of the pupil concerned and limit the use of those only to those required to liaise with that pupil.

### Parents whose children are no longer at The Charter School – The Committee operates to communicate with parents whose children are current pupils at The Charter School. As the Committee do not hold pupil details the Committee is not in a position to discriminate between parents who are no longer in this position. Nor can the Committee police those who continue or want to be part of the year WhatsApp groups. If the Committee comes into knowledge that an individual is not or is no longer a parent then it may delete contact details of that individual or remove that person from the year WhatsApp groups. In all other cases individuals are asked to notify the Committee that they are no longer parents and take the appropriate action to remove themselves from the year WhatsApp groups.

### Types of Data

### The data held by the Committee will primarily be contact details only. Those details may be connected with the types of activities carried out by that individual though those details will only be brief. There may be specific data held for a particular Activity (for example food preferences) however these will not be kept after the Activity has ended.

### Lawful Basis

### Our holding of your personal data uses one of two lawful reasons for holding that data, which is not necessarily just your consent. However because of the nature of the FOTCSND we do infer your interest in participation when engaging with you. If you are concerned by this please continue to read.

Consent – if you are a Committee member or a volunteer of our Activities we infer your consent to hold your contact details from your engagement with us.

Consent – if you are in receipt of the FOTCSND mailing list or upon applying to join the year WhatsApp groups then you will have given us a continuing consent to receive mailings from us or to communicate with you in that forum.

Consent – if you have contacted us with an enquiry through our email then we infer consent for communicating with you over the course of the school year or until you ask us not to contact you again.

Legitimate interests – we may hold data showing that you have withdrawn consent to our using your information; to liaise with The Charter School to organise specific Activities or support Activities generally; to contact individuals as a result of issues arising from an Activity such as taking a donation/delivering a raffle prize etc.; where there is an anticipated legal issue that may require that we communicate with you or involving the welfare of a pupil. Where the contact concerns a financial transaction the Committee may record contact details in order to protect the individuals of the Committee.

### Compliance

In processing personal data, we will comply with relevant legislation in force from time to time in the UK. We may change this policy from time to time by updating this policy as we improve our Activities to you and as relevant Data Protection legislation comes into force including the equivalent of the General Data Protection Regulation (EU) 2016/679. Your personal information will continue to be held in accordance with our policy as it develops.

**Testimonials**

We would be delighted if you would provide us with testimonials of your great experiences with us. We will review these before placing them on our marketing literature including our website and will only use your first name or an assumed name if you so wish. Should you wish for your testimonial to be removed please let us know using the contact details provided below.

**Storage**

We hold your data securely. The information we hold about you may be stored outside the UK or European Economic Area in order to process your data. Whilst required information is held in a cloud based storage system.

We endeavour to hold contact details for only so long as individuals are parents or are actively participating in a current or prospective Activity. Where information relates to compliance and/or to protect the Committee (including but not limited to financial information) this data will be held securely.

Initially your personal information may be held securely by our third party platforms supplier***.*** They would not normally view or use your personal information and it is subject to their own privacy policies that we can direct you to upon request.

**Request for Deletion of information**

If you have provided your consent to receive future marketing messages then we will hold this information until you indicate that you no longer wish to receive messages from us.

If you contact us to indicate that you no longer wish to receive messages from us we may store that indication centrally.

**Controlling your personal information**

**Your Rights**

Data Protection legislation gives you certain rights to control of your personal data. These are:

1. The right to be informed.
2. The right of access.
3. The right to rectification.
4. The right to erasure.
5. The right to restrict processing.
6. The right to data portability.
7. The right to object.
8. Rights in relation to automated decision making and profiling.

Further information on these rights and how to complain can obtained from the UK Information Commissioner whose website is at: [www.ico.org.uk](http://www.ico.org.uk).

We fulfil these rights in the ways set out below however we do reserve our right to continue to process your data or refuse your requests as set out in relevant legislation.

**Privacy Policy**

We provide you with information on our use of your data by detailing the information we gather and process in this Privacy Policy.

**Consent**

You have control over the information you supply to us whether by:

1. consent gained from your continuing to browse our site, or
2. your consent by completing a contact or registration form, or
3. your consent to further processing to send you ongoing marketing material concerning our services, or
4. by your contacting us about your personal information as described below.

The situation in which you give this information will inform our understanding of the consent you have given and the direct purpose for which you supply your data. If you choose to withdraw your consent to the processing of your personal information at any time then you should inform us in writing using our contact details below.

**Data Requests**

You may request details of personal information which we hold about you under the relevant Data Protection legislation in force at the time (a “Data Request”). If you would like a copy of the information held about you, please email us.

**Data Correction, Complaints & Deletions**

If you believe that any information we are processing on you

* is incorrect or incomplete, (perhaps for example because you have seen you name spelt incorrectly or someone else has received a call meant for you) or
* is being mis-used, or
* should no longer be processed by us (perhaps for example because you no longer wish to be contacted)

then please email us as soon as possible. We will promptly correct or delete any information found to be incorrect or no longer necessary and deal with your complaint. These rights to object are subject to our right to consider whether we are permitted or required to continue the processing in which event we will inform of our reasons.

We ask that if you have any concern you first approach us via our contact email address [friends@charternorthdulwich.org.uk](mailto:friends@charternorthdulwich.org.uk). Should you wish to take the matter further we ask that you contact us in writing setting out you concerns in detail to enable us to provide you with an effective response.

**Lawful Disclosure by Us**

Please note that you hereby provide your consent to and in any case we may be required to disclose your data to lawful authorities for the prevention of crime, pupil welfare or regulatory purposes or a court as such court requires. In some circumstances we may not be permitted to inform you that we have made such a disclosure.