RUSSELL HOUSE PARENTS' ASSOCIATION ("RHPA") PRIVACY POLICY - EFFECTIVE 25 MAY 2018

SETTING THE SCENE

The policy describes how we collect and use your information and it covers all the ways you can interact with us. We use some words throughout the policy that are detailed at the bottom of it - so if you need to check what one of these words mean, scroll down to the bottom. It takes effect from and including 25 May 2018.

Please note that you don't have to transfer us your information; however, if you don't, it will severely limit your ability to be involved with RHPA and particularly receive information about what we do and the Events we operate.

We have set the policy out in the following sections, so it's best to look there first:

- What information do we collect;
- How do we use your information and what is the lawful basis;
- Who do we share your information with;
- Where do we process and store your information or transfer it;
- Your rights.

Information on our website page and on emails may, from time to time, contain links to and from the websites or links of third parties. If you follow one of these links, please note that they probably have their own privacy policy and that we do not accept any responsibility or liability for any such policy. Please check these policies before you submit any information via these links.

1. WHAT INFORMATION DO WE COLLECT?

Here is the information that we may collect about you:

1.1. information you provide to us about yourself and your family in various media like photos, videos, or audio files;

1.2. your name, address and previous addresses, e-mail addresses and phone numbers, credit and/or debit card information if you are paying for things, business information such as where you work or work contact details;

1.3. information you give us when you get when you contact us, e.g. by email, social media, or by phone, by responding to requests for information or through website links set up by the RHPA including in connection with Events;

1.4. information from attendance at meetings, such as Committee meetings or at Events, including references in minutes or in connection with projects you have undertaken;

1.5. information given in connection with raising money for charitable purposes;

1.6. information that the School may give us in connection with the operation of RHPA.

2. HOW DO WE USE YOUR INFORMATION AND WHAT IS THE LAWFUL BASIS?

2.1. We use your information in the following ways for our operation as a parents' association:

2.1.1. to comply with the Constitution;

2.1.2. to run Events;

2.1.3. to communicate with you about RHPA and School matters;

2.1.4. to operate bank accounts, make payments and ensure we run financial matters appropriately;

2.1.5. to let you and your family participate in Events and RHPA matters;

2.1.6. to ensure the RHPA is as effective and relevant as possible and gives a positive experience as a Parent;

2.1.7. to operate and administer our business and achieve our objectives, including for survey purposes and to keep our business, website page, bank accounts and our systems safe and secure;

2.1.8. to ensure that we comply with the law and regulations, including for tax, legal, charity, Companies Act 2006, Charities Commission, reporting and auditing obligations;

2.1.9. in case we need to check we have carried out your wishes correctly, to resolve queries or issues;

2.1.10. to liaise with the School where necessary;

2.1.11. to provide you information about the above.

2.2. We process your information for the purposes set out above on the following grounds:

2.2.1. given our legitimate interest in operating as parents' association, in complying with our legal duties and regulations that apply to us and in keeping our records up to date;

2.2.2. with your express consent (which can be withdrawn at any time).

3. WITH WHOM DO WE SHARE YOUR INFORMATION

Generally, we will not share your information. However, there are certain circumstances where we may share your information, including:

3.1. with other Parents or the School to ensure we can do the things set out above in the section "Uses made of your Information";

3.2. with third parties for the performance of any contract we enter into with them;

3.3. where you specifically ask us to share it;

3.4. if we are under a duty to disclose or share your personal data in order to comply with any laws or regulations.

4. WHERE DO WE PROCESS AND STORE YOUR INFORMATION OR TRANSFER IT

4.1. Each RHPA member generally processes your information on their personal computers. This information is either stored on those computers or in servers hosted by external providers. There is no access between RHPA members systems unless those people are married or are in a relationship.

4.2. There is no central server where information is processed, although the servers that host our website page may store your information if you get in touch with us through the contact page. However, some of the websites we use (e.g. Easyfundraising or Jumblebee) process some of your information and store it on their own servers.

4.3. Information in writing is stored in the homes of RHPA members.

5. YOUR RIGHTS

5.1. Accessing information: You may access information held about you. Your right of access can be exercised by emailing the Secretary.

5.2. Managing your information:

5.2.1. We need accurate information. You can help by informing us whenever your circumstances change.

5.2.2. If you wish to update information about you which is inaccurate or incorrect, please do so by emailing the Secretary

5.3. Deleting your data:

5.3.1. Generally, we will store your data for as long as you remain a Parent.

5.3.2. However, in certain circumstances, including through regulatory requirements, we may have to store this for a longer period.

5.3.3. In relation to photos and administrative records (such as minutes of meetings), we will keep the records for up to 12 years.

5.3.4. You may request that we delete your information and we will do so but:

5.3.4.1. only if we do not need to retain it for any of the matters set out in the section "**HOW DO WE USE YOUR INFORMATION AND WHAT IS THE LAWFUL BASIS?"** above;

5.3.4.2. your information may be impossible to permanently delete and by "delete" we mean put beyond reasonable use;

5.3.4.3. your information which you have shared with others (e.g. on our website page) may remain publicly available.

5.4. Objecting to or restricting use of your information:

5.4.1. You can ask us to stop using all or some of your information or to limit our use of it.

5.4.2. We will do so but:

5.4.2.1. only if we do not need to retain or use it for any of the matters set out in the section "**HOW DO WE USE THE INFORMATION AND WHAT IS THE LAWFUL BASIS?"** above;

5.4.2.2. your information which you have shared with others (e.g. on our website page) may remain publicly available.

5.5. Transferring your data:

5.5.1. if you want to transfer your information you have provided us elsewhere, please write to the Secretary. However:

5.5.1.1. we may also need to retain it for any of the matters set out in the section "**HOW DO WE USE YOUR INFORMATION AND WHAT IS THE LAWFUL BASIS?"** above;

5.5.1.2. we may be restricted from doing so for the same reasons.

5.6. You have the right to lodge a complaint with the Information Commissioner's Office (go to https://ico.org.uk/) .

6. OTHER IMPORTANT MATTERS

6.1. Changes: Any changes we may make to this policy will become effective immediately on posting on our website page.

6.2. Contact**:**

6.2.1. If you have any questions about this policy or suggestions on any ways it can be improved, please email the Secretary.

6.2.2. For the purpose of GDPR, the data controller is Russell House Parents Association, Charity 1105471, Russell House School, Station Road, Otford, Sevenoaks, TN14 5QU.

7. WHAT THE WORDS MEAN

7.1. Unless they are defined specifically in here, words capitalised in this policy have the same meaning as in the Constitution.

7.2. "Committee" has the meaning given in the Constitution.

7.3. "Constitution" means the constitution of RHPA from time to time in force.

7.4. "Events" all and any events organised by RHPA including its ball, Summer Fair, film nights, Halloween Night, Avant Ski, Dads' night out and, quiz nights.

7.5. "GDPR" means the General Data Protection Regulation (EU 2016/679).

7.6. "we, "us", "our" means RHPA being Committee members and Parents but only when, and to the extent that, they are acting in their capacity as Committee members or Parents on RHPA business.

7.7. "Parent" means a parent at the School from time to time.

7.8. "our website page" means the RHPA page on the School website.

7.9. "School" means Russell House School.

7.10. "your information" means personal information about you.