

FRIENDS OF BENHURST

PRIVACY POLICY

ALLOCATION OF RESPONSIBILITY FOR DATA PROTECTION

Data Controller: Friends of Benhurst (FOB)

As the data controller, the Friends of Benhurst are responsible for the implementation of GDPR in the processing and retention of the personal data and are accountable for the protection of this data.

Committee/ Senior Information Risk Owner:

Joanne Holland (Chair) and acting SIRO

Egle Juozapaitiene (Treasurer)

Karen Arnold (Secretary)

Gemma Doheny (Secretary)

Data Protection Officer: Rebecca Dew

Friends of Benhurst Data Protection Office (DPO) Job description

Friends of Benhurst's appointed data protection officer will ensure the personal data processing activities of the Friends of Benhurst are lawful and compliant with GDPR and other data protection laws. The data protection officer will inform staff on compliance when processing data, in accordance with the organisation's policies as appropriate.

The data protection officer is a data subject's contact for Friends of Benhurst, responsible for providing information on a subject's rights as well as support through the process of exercising these rights, should a data subject decide to do so.

The data protection officer for Friends of Benhurst is not in a decision-making or data handling position within the organisation and will advise from an independent perspective, preventing the risk of a conflict of interest.

Please see the ICO website for more information on the responsibilities of a Data Protection Officer: <https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/accountability-and-governance/data-protection-officers/>

Contact details for Friends of Benhurst's Data Protection Officer:

Email: beccadew1@hotmail.co.uk

SCOPE

This Privacy Policy applies to the handling of data obtained, processed and stored by the Friends of Benhurst (FOB).

The following outlines the type of data we process and our reasons for doing so; how we collect, use, store and protect a data subject's personal information.

Upon collection of personal data, Friends of Benhurst will obtain the data subject's consent to the processing and storage of their data in accordance with this Privacy Policy.

LAWFUL BASIS AND PURPOSE OF DATA COLLECTION

The Friends of Benhurst Association (FOB) is a fundraising committee run by parents of pupils at Benhurst Primary School. FOB is established to organise fundraising events and activities for the Children of Benhurst Primary School, as well as fund projects and equipment that are vital to the practices of Benhurst Primary school, and are aimed to improve the education and experience of pupils.

The FOB uses personal data to complete fundraising projects when:

- allocating event tickets to parents and children,
- processing orders for merchandise,
- taking payments for events, activities and merchandise
- organising activities for selected students in the school
- confirming event attendance
- completing risk assessments for event bookings
- Incident reporting

Without the use of the personal data outlined in this document, Friends of Benhurst would be unable to complete fundraising projects or allocate funds. The data processing activities of Friends of Benhurst fall under the following:

Article 6 (1) (a) *the data subject has given consent to the processing of his or her personal data for one or more specific purposes;*

Article 6 (1) (f) *processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data..."*

Lawful Basis- Special Category- Health Data

Health data is processed when there has been an incident at an event, this data falls under the following basis and is processed in accordance with this document.

Article 9 (2)(d) *processing is carried out in the course of its legitimate activities with appropriate safeguards by a foundation, association or any other not-for-profit body with a political, philosophical, religious or trade union aim and on condition that the processing relates solely to the members or to former members of the body or to persons who have regular contact with it in connection with its purposes and that the personal data are not disclosed outside that body without the consent of the data subjects;*

THE DATA WE COLLECT

Friends of Benhurst collect and process the following data:

- Name
- Home Address
- Personal contact information: landline numbers, mobile numbers and email addresses
- Details of training and certification (for staff and volunteers, please refer to Staff Privacy Policy)

The personal data of Children

Friends of Benhurst process the following data for Children. Consent is obtained from a child's parent or guardian, in accordance with this Privacy Policy, prior to the collection and processing of data.

- Name
- Age
- School (Including Class)

HOW IS DATA COLLECTED

Friends of Benhurst collect data directly from a subject or their legal Parent/Guardian when they participate in our fundraising projects, this may be done online or in person. Consent to the processing and handling of data will always be obtained upon collection of personal data in accordance with the Privacy Policy.

The data collected by Friends of Benhurst will be limited to that necessary for the fundraising activity and only processed for the purpose of the activity consent was obtained for. Necessary data will be retained for the duration of the project and destroyed once the project is complete. A data subject provides Friends of Benhurst with the personal data when:

- Expressing interest in fundraising events
- Purchasing tickets for fundraising events

- Participating in fundraising activities
- Purchasing merchandise which must be ordered through a third-party organisation

The above data is collected through forms, completed by the data subject. These forms may be on paper or online.

Squid

When purchasing tickets or merchandise online, Friends of Benhurst use Squid to securely take payments and collect the relevant personal data in relation to the purchase. Squid does not share your financial information with us but does share personal data for the purpose of order processing including Names, Addresses and contact details.

All data obtained through purchases made through squid are processed and protected in accordance with their Privacy Policy and is not the responsibility of Friends of Benhurst whilst held by squid.

The personal data of Children

For fundraising events and activities for Children, Friends of Benhurst will collect the personal data outlined above, as appropriate, from the Child's legal Parent/Guardian.

HOW IS DATA USED

The Friends of Benhurst use personal data for the purposes of participation in our fundraising. Once a data subject has consented, throughout the relevant project, FOB will use data to:

- Allocate tickets for events
- Confirm booked event places
- Confirm event attendance or activity participation
- Confirm merchandise purchase
- Place orders for merchandise purchases with the relevant third party fulfilling orders
- For analytical purposes, to determine the success of fundraising activity (Data is later anonymised)
- Contact the data subject with details or changes to the project

FOB will never retain your data for use in future fundraising activities. Once the project is finished, the FOB destroys the personal data it holds on a subject.

The Friends of Benhurst will on occasion use attendance or purchasing data to monitor how successful a fundraising event was. This data will be anonymised by FOB and retained as analytical data with no way of identifying participants as and any personal information will be destroyed at the end of the project, as outlined further in our data retention policy.

The personal data of Children

Friends of Benhurst hold events and activities for the Children of Benhurst Primary School and, on occasion, potentially Children not attending the school such as friends of family members of the pupils. FOB uses the Children's personal data for the following, when appropriate:

- Allocate event places
- Confirm attendance
- Confirm activity participation
- Confirm any fees for an activity or event are paid
- Log any incidents during activities for safeguarding purposes, reporting to Benhurst Primary School
- Collecting children from their classrooms for activity participation
- Deliver purchased merchandise or tickets to the children

Websites and Social Media

The Friends of Benhurst promote fundraising activities are advertised on the Benhurst Primary School website and our Facebook page.

These pages do not belong to Friends of Benhurst. Therefore, data collected by these sites collect and handle your data in accordance with the site owner's Privacy Policies, which will be available on their websites. How these companies use data they collect from you is not the responsibility of Friends of Benhurst.

Emails

Benhurst Primary School send our information and marketing emails on our behalf. The Friends of Benhurst do not hold a mailing list of personal email addresses for Marketing purposes.

Data held by Benhurst Primary School is subject to their Privacy Policy.

DATA RETENTION & SECURITY

Digital records

The Friends of Benhurst store digital records on the CEO's computer. The computer is password protected and routinely scanned for potential threats and data breaches. Access to records is strictly for authorised committee members and volunteers for the duration of their data handling activity only.

All digital records will only be held by Friends of Benhurst for the duration of the project, at the end of which all relevant records will be erased from the device.

Paper records

All hardcopy records are stored at Benhurst Primary School, on school grounds. Access to these records is also strictly authorised committee members or volunteers only for the duration of their data handling activity.

All hardcopy records are retained for the duration of the relevant project and are securely shredded when no longer in use.

Access

Access to all data held by Friends of Benhurst is restricted to committee members. Access to records can be granted to authorised volunteers, should they need to process data for a project.

Friends of Benhurst only store personal data for the duration of the project in which the data subject is participating and has consented to. All records are securely destroyed or erased at the end of a project.

DATA SHARING AND THIRD PARTIES

Friends of Benhurst will never sell or rent data to a third-party organisation.

Friends of Benhurst use third party organisations when fulfilling merchandise orders and selling tickets, necessary personal data will be shared with the relevant third party strictly for the purpose of processing and completing orders.

Data Sharing with Benhurst Primary School

Friends of Benhurst is a charity, whose main purpose is to Fundraise for Benhurst Primary School and their pupils. Therefore, data sharing between ourselves and Benhurst Primary School is common but is only done when strictly necessary for the project.

RIGHTS OF DATA SUBJECT

Under GDPR, as a data subject you have the following rights:

- **The right to be informed** how your personal data is processed and for what purpose.
- **The right to request access** your personal data
- **The right to rectify** any inaccurate or incomplete personal data
- **The right to the erasure of your personal information** ('the right to be forgotten')
- **The right to restrict the processing** your personal data
- **The right to data portability** (copying or transferring your personal data to another controller)
- **The right to object** the processing of your personal data
- Rights in relation to **automated decision making and profiling** (where there is no Human involvement)

Not all of the above rights are appropriate for all of the data we hold.

Should a data subject wish to exercise the above rights, they should contact the data protection officer for Friends of Benhurst using the details provided in this document.

All data requests will be completed within one month of the initial request, free of charge to the data subject.

The personal data of Children

In a case that a child is the data subject, they have the same rights to their data, listed above, as an adult. Consent of the Child's parent or guardian will be obtained where a child is under 16 years of age.

FRIENDS OF BENHURST CONTACT DETAILS

Address:

ICO Registration

Registration number:

Date registered:

Registration expires:

Data controller: Friends of Benhurst Association

FOB Contact Details

Email: fob@benhurst.havering.sch.uk

Data Protection Officer:

NAME Rebecca Dew

EMAIL beccadew1@hotmail.co.uk

CHANGES TO PRIVACY POLICY

Friends of Benhurst have the right to make changes to this Privacy Policy in order to remain compliant with GDPR regulations and other data protections laws. Those who have consented to us holding their personal data in accordance with this policy will be notified of any changes and hold the right to revoke their consent.

