

# Privacy Notice

## What is the purpose of this document?

Singh Sabha Southall Education Centre (SSSEC) is committed to protecting the privacy and security of your personal information.

This privacy notice describes how we collect and use personal information about you during and after your working relationship with us, in accordance with the General Data Protection Regulation (GDPR).

It applies to all members of this organisation.

The **data controller** for SSSEC is Tejinder Pal Singh, who can be contacted at [sssec@hotmail.co.uk](mailto:sssec@hotmail.co.uk). This is the individual responsible for deciding how we hold and use personal information about you. We are required under data protection legislation to notify you of the information contained in this privacy notice.

This notice applies to current and former students, parents and volunteers. We may update this notice at any time. When changes are made to this document we will inform you electronically of the update.

It is important that you read this notice, together with any other privacy notice we may provide, on specific occasions when we are collecting or processing personal information about you, so that you are aware of how and why we are using such information.

## Data protection principles

We will comply with data protection law. This says that the personal information we hold about you must be:

1. Used lawfully, fairly and in a transparent way.
2. Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes.
3. Relevant to the purposes we have told you about and limited only to those purposes.
4. Accurate and kept up to date.
5. Kept only as long as necessary for the purposes we have told you about.
6. Kept securely.

## **The kind of information we hold 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).

There are "special categories" of more sensitive personal data which require a higher level of protection.

We may collect, store, and use the following categories of personal information about you:

- Personal contact details such as name, title, personal email addresses, home addresses, telephone number.
- Date of birth.
- Next of kin and emergency contact information.
- Photographs.

We may also collect, store and use the following "special categories" of more sensitive personal information:

- Information about students' health, including any medical conditions and special educational needs.
- Volunteers' DBS status (if required by the position they hold)

### **How is your personal information collected?**

We typically collect personal information about students, parents, and volunteers through the admissions process directly from them. We do not collect any additional information from third parties.

We may also collect additional personal information during the course of student-related activities throughout the period of your registration with us (e.g. attendance, exam results etc.).

### **How we will use information about you**

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

1. Where we need to provide the services agreed on upon admission, e.g. to contact you to give you information, call to check absences.
2. Where we need to comply with a legal obligation.

We may also use your personal information in the following situations, which are likely to be rare:

1. Where we need to protect your interests (or someone else's interests).
2. Where it is needed in the public interest or for official purposes.

## Situations in which we will use your personal information

We need all the categories of information in the list above (see “**The kind of information we hold about you**”) primarily to allow us to perform the services and to enable us to comply with legal obligations. In some cases, we may use your personal information to pursue legitimate interests of the organisation, provided your interests and fundamental rights do not override those interests. The situations in which we will process your personal information are listed below:

- Administering the services we have agreed with you.
- Maintaining your personal details (e.g. your name, photograph, address and preferred contact details), including ensuring effective communications with you.
- Maintaining a formal record of your activities and education with us.
- Training and development requirements.
- Dealing with legal disputes involving you, or other members, including accidents.
- Complying with health and safety obligations.
- To prevent fraud.
- Equal opportunities monitoring.
- Managing alumni relations and fundraising.
- Managing complaints made to us.

Some of the above grounds for processing will overlap and there may be several grounds which justify our use of your personal information.

## If you fail to provide personal information

If you fail to provide certain information when requested, we may not be able to perform the services we have agreed with you (such as updating you about our activities), or we may be prevented from complying with our legal obligations (such as ensuring the health and safety of our members).

## Change of purpose

We will only use your personal information 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 we need to use your personal information 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 information without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

## How we use particularly sensitive personal information

"Special categories" of particularly sensitive personal information require higher levels of protection. We need to have further justification for collecting, storing and using this type of personal information. We may process special categories of personal information in the following circumstances:

1. In limited circumstances, with your explicit written consent.
2. Where we need to carry out our legal obligations and in line with our privacy standard.
3. Where it is needed for emergency situations for health and safety reasons.
4. Where it is needed to assess your volunteering capacity on health grounds/safety(DBS), subject to appropriate confidentiality safeguards.

Less commonly, we may process this type of information where it is needed in relation to legal claims or where it is needed to protect your interests (or someone else's interests) and you are not capable of giving your consent, or where you have already made the information public.

## **Do we need your consent?**

We do not need your consent if we use special categories of your personal information in accordance with our written policy to carry out our legal obligations or exercise specific rights in the field of law. In limited circumstances, we may approach you for your written consent to allow us to process certain particularly sensitive data. If we do so, we will provide you with full details of the information that we would like and the reason we need it, so that you can carefully consider whether you wish to consent.

## **Information about criminal convictions**

We may only use information relating to criminal convictions where the law allows us to do so. This will usually be where such processing is necessary to carry out our obligations and provided we do so in line with our privacy standard.

Less commonly, we may use information relating to criminal convictions where it is necessary in relation to legal claims, where it is necessary to protect your interests (or someone else's interests) and you are not capable of giving your consent, or where you have already made the information public.

We may also process such information about members or former members in the course of legitimate membership activities with the appropriate safeguards.

We envisage that we will not hold information about criminal convictions.

We will only collect information about criminal convictions if it is appropriate given the nature of the role and where we are legally able to do so. Where appropriate, we will collect information about criminal convictions where we need that information because of your role or our activities. We may be notified of such information directly by you in the course of your membership with us.

We are permitted to use your personal information in this way to carry out our obligations.

## **Data sharing**

We will not share your data with any third parties.

## **Data retention**

### **How long will you use my information for?**

We will only retain your personal information for as long as necessary to fulfil the purposes we collected it for, and usually for 6 years after your registration ceases. This may include for the purposes of satisfying any legal, accounting, or reporting requirements. To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

In some circumstances we may anonymise your personal information so that it can no longer be associated with you, in which case we may use such information without further notice to you. Once you are no longer a student, parent or volunteer of the organisation we will retain and securely destroy your personal information in accordance with applicable laws and regulations.

## **Rights of access, correction, erasure, and restriction**

### **Your duty to inform us of changes**

It is important that the personal information we hold about you is accurate and up-to-date. Please keep us informed if your personal information changes during your relationship with us.

### **Your rights in connection with personal information**

Under certain circumstances, by law you have the right to:

**Request access** to your personal information (commonly known as a "data subject access request"). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.

**Request correction** of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.

**Request erasure** of your personal information. This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing (see below).

**Object to processing** of your personal information where we are relying on a legitimate interest and there is something about your particular situation which makes you want to object to processing on this ground.

**Request the restriction of processing** of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.

If you want to review, verify, correct or request erasure of your personal information, or object to the processing of your personal data, or request that we transfer a copy of your personal information to another party, please contact us using the above contact details.

### **No fee usually required**

You will not have to pay a fee to access your personal information (or to exercise any of the other rights). However, we may charge a reasonable fee if your request for access is clearly unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances.

### **What we may need from you**

We may need to request specific information from you to help us confirm your identity and ensure your right to access the information (or to exercise any of your other rights). This is another appropriate security measure to ensure that personal information is not disclosed to any person who has no right to receive it.

### **Right to withdraw consent**

In the limited circumstances where you may have provided your consent to the collection, processing and transfer of your personal information for a specific purpose, you have the right to withdraw your consent for that specific processing at any time. To withdraw your consent, please contact us using the above contact details. Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law.

## **Changes to this privacy notice**

We reserve the right to update this privacy notice at any time, and we will provide you with a new privacy notice when we make any substantial updates. We may also notify you in other ways from time to time about the processing of your personal information.

If you have any questions about this privacy notice, please contact us at [sssec@hotmail.co.uk](mailto:sssec@hotmail.co.uk).

**Last updated: 11/06/2018**