

## Annex 1

### Mearns Academy Parent Council (MAPC) Data Protection Policy

The Mearns Academy Parent Council (hereinafter known as “MAPC) Data Protection Policy describes the categories of personal information that we process and for what purposes. We are committed to collecting and using such data fairly and in accordance with the requirements of applicable data protection legislation.

MAPC Data Protection Policy is administered by the Committee of MAPC and can be contacted at [vicechair@mapc.org.uk](mailto:vicechair@mapc.org.uk). Every year the Committee hold an AGM in September where members of the Committee are elected. Any parent or guardian of a child at Mearns Academy is welcome to stand for a position on the Committee and every parent or guardian is encouraged to attend the AGM.

MAPC are members of Connect.

#### **Definitions**

**“Personal Information”** – includes all information that relates to an identified or identifiable individual. This includes information that we already hold about you and further information that we may collect about you in the future. The information we hold is, *inter alia*, name, date of birth, address, nationality, ethnicity, religion, disabilities, health and dietary issues, emergency contact details, and eligibility for Gift Aid.

**“Data Controller”** – determines the purposes and means of processing personal data. For the purposes of this Privacy Notice the Vice Chair of MAPC is the Data Controller. The Data Controller can be contacted on [vicechair@mapc.org.uk](mailto:vicechair@mapc.org.uk).

**“Data Processor”** – is responsible for processing personal data on behalf of the Data Controller. For the purposes of this Privacy Notice the Chair, Vice Chair, Secretary, Treasurer, Media Coordinator and 200Club organiser are Data Processors.

**“Data Provider”** - any person, *inter alia*, parents or guardians of Mearns Academy pupils, friends or relatives thereof or member of the public, who provides Personal Information to MAPC.

**“Third Party Processor”**– are entities who are not on the MAPC Committee who are utilised by the Data Controller to process Personal Information.

Jottacloud, which is a Norwegian based online storage company, where we store pictures MAPC held activities and events. We also store copies of forms which contain Personal Information and cannot be destroyed for legal reasons. (see <https://docs.jottacloud.com/security-and-privacy/general-data-protection-regulation-gdpr>)

Facebook where we communicate regarding events with parents and guardians (see <https://www.facebook.com/business/gdpr>).

From time to time other Third Party Processors will be used, for example, when fundraising activities are organised, and we will ensure that such Third Party Processors have a Privacy Policy in place which is compliant with the requirements of applicable data protection legislation.

### **How we gather personal information**

The majority of the personal information we hold, is provided to us directly by yourself in either paper form or via online methods, such as Facebook messages.

Information may also be sent by email to the Data Processors.

### **How do we process your personal data?**

We comply with our obligations under the relevant data protection legislation by keeping personal data up to date; by storing and destroying it securely; by not collecting or retaining excessive amounts of data; by protecting personal data from loss, misuse, unauthorised access and disclosure and by ensuring that appropriate technical measures are in place to protect personal data.

The Personal Information is processed so that MAPC to have the ability to contact the Data Provider, such as parents and guardians, to inform them of meetings, activities or events that MAPC may be running or attending.

MAPC use Personal Information for the following purposes: -

- we collect personal information in order to invite parents and guardians of Mearns Academy pupils to meetings
- to fundraise and promote the interests of MAPC
- to maintain our own accounts and records.

We would ask that Data Providers help us process the personal data correctly by keeping us up-to-date with any changes to the Personal Information held.

### **What is the legal basis for processing your/your child(ren)'s personal data?**

We only use Personal Information where that is permitted by the laws that protect your privacy rights.

We only use personal information where:

- we need to use the information to comply with our legal obligations
- we need to use the information to contact Data Providers, regarding meetings, and events (i.e. for the day to day running of MAPC)
- we need to provide information to a Third Party Processor in order to organise an activity or event for which consent has been given to attend (e.g. 200Club)
- we need to record the Personal Information in order that it is available to other Data Processors within MAPC.
- *an emergency is taking place and it is believed not sharing the details would cause harm or distress be it physical or otherwise.*
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*In all cases we will only share Personal Information to the extent needed for those purposes.*

We will never distribute, publicise or sell your Personal Information to any third party for the purposes of marketing.

### **How we store personal data**

We are committed to the protection of your personal information.

We generally store personal information in secure digital online database systems, where access to that data is restricted and controlled.

**Emails** – from time to time Personal Information might be given to Data Processors via Email. Emails should where possible be sent to the following email addresses:

[chair@mapc.org.uk](mailto:chair@mapc.org.uk)

[vicechair@mapc.org.uk](mailto:vicechair@mapc.org.uk)

[treasurer@mapc.org.uk](mailto:treasurer@mapc.org.uk)

[secretary@mapc.org.uk](mailto:secretary@mapc.org.uk)

[200club@mapc.org.uk](mailto:200club@mapc.org.uk)

We cannot be held responsible for the privacy and confidentiality of Personal Information which is sent by email to email accounts other than those mentioned above.

#### **Printed records and Event data**

Paper is still used within MAPC to capture and retain some data, for example the following:

- 200Club tickets
- Fundraising events
- Track and Trace at face-to-face meetings

#### **Events**

If Personal Information is provided in paper form or it is necessary to provide Third Party Processors with information in paper form.

We will ensure:

- a) Transfer of paper is secure, such as physical hand-to-hand transfer or registered post.
- b) Paper forms are securely destroyed after use including by Third Party Processors.
- c) Secure destruction will be through a cross-shredding machine or securely burned.
- d) Always keeping the paper records secure, especially when in transit, by using:
  - i. A lockable brief case.
  - ii. A fireproof lockable box, if stored long term.
- e) If transferred to a Third Party Processor, we will audit that they return them when the event is complete.

#### **Sharing and transferring personal Information**

We will only normally share Personal Information within our Data Processors.

We will share your Personal Information with others outside those mentioned above where we need to meet or enforce a legal obligation. We will only share Personal Information to the extent needed for those purposes.

We will never sell Personal Information to any third party for the purposes of marketing.

Personal Information will be treated as strictly confidential. We will only share Personal Information with third parties outside of MAPC where there is a legitimate reason to do so.

### **Transfers outside the EEA**

MAPC will not transfer Personal Information outside of the UK unless you provide your consent. In this regard, this situation may arise where an event is taking place outside of the UK and it is necessary to provide Personal Information to comply with our legal obligations, although generally such an event will have its own data collection form which will be securely held and disposed of after the event.

### **How do we protect personal data?**

We take appropriate measures to ensure that the Personal Information provided to us is kept secure, accurate and up to date and kept only for as long as necessary for the purpose for which it is used.

To this end we will ask Data Providers to provide their Personal Information for each event or meeting.

### **How long do we keep your personal data?**

#### **200 Club**

We will retain your Personal Information for thirteen months (Jan to Feb year after).

#### **Track and Trace**

We will retain your Personal Information for 21 days.

#### **Other Events/Meetings**

We will retain your full Personal Information for a period of six years or any required period to fulfil our legal obligations for insurance and legal claims.

### **Your rights and your personal data**

You have the right to object to how we process your personal information. You also have the right to access, correct, sometimes delete and restrict the personal information we use. In addition, you have a right to complain to us and to the Information Commissioner's Office.

Unless subject to an exemption under the relevant data protection legislation, you have the following rights with respect to your personal data: -

- **The right to be informed** – you have a right to know how Personal Information will be used by MAPC.
- **The right to access your personal data** – you have the right to ask us to share the Personal Information held about you by MAPC.
- **The right to rectification** – this just means you can update your Personal Information if it is inaccurate or if something is missing.
- **The right to erasure** – this means that you have the right to request that Personal Information held by MAPC is deleted. There are some exceptions, for example, some information can be held for legal reasons. This may result in some documents being redacted as Personal Information may appear in a document along side others Personal Information (e.g. name appear in Minutes of a Meeting).
- **The right to restrict processing** – if you think there is something wrong with the Personal Information being held about you, or you are not sure that the rules are being complied with, you can restrict any further use of your Personal Information until the problem is resolved.

- **The right to data portability** – this means that if you ask us we will have to share your Personal Information with you in a way that can be read digitally. This makes it easier to share information with others.
- **The right to object** – you can object to the ways your Personal Information is being used. This should make it easier to avoid unwanted marketing communications and spam from third parties.
- **Rights in relation to automated decision making and profiling** – this protects you in cases where decision are being made about you based entirely on automated processes rather than a human input. We have no such processes.

Please contact the current Vice Chair to discuss the Data Protection Policy and the processing of Personal Information by MAPC.

### **Further processing**

If we wish to use your personal data for a new purpose, not covered by this Data Protection Notice, then we will provide you with a new notice explaining this new use prior to commencing the processing and setting out the relevant purposes and processing conditions. Where and whenever necessary, we will seek your prior consent to the new processing.

### **Contact Details**

To exercise all relevant rights, queries of complaints please in the first instance contact our Data Protection Lead at MAPC, c/o Mearns Academy, Laurencekirk or email [vicechair@mapc.org.uk](mailto:vicechair@mapc.org.uk)

You can contact the Information Commissioners Office on 0303 123 1113 or via email <https://ico.org.uk/global/contact-us/email/> or at the Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire. SK9 5AF.