

PRIVACY POLICY

The Data Protection Act 2018 ('DPA 2018') and General Data Protection Regulation ('GDPR') impose certain obligations in connection with processing personal data. This Privacy Policy explains the way that PerformR collects and uses personal data that you provide to us off and online and how we use it, as the privacy of your personal information is important to PerformR. We will not sell, rent or trade your personal information to any third party and will take care to protect the privacy and security of your information.

PerformR is the data controller within the meaning of the GDPR.

Mobile: 07533043615

Email: info@performr.uk; contact Leila McQuaid.

We may amend this privacy notice from time to time. If we do so, we will advise you and make available the amended privacy notice.

Personal data PerformR collects and uses

PerformR collects, uses and stores information on computer systems and on paper; information on our secure database is accessed by administrators. It is a requirement that you provide the personal data we request in order for us to manage and run the School. If you do not provide the information we request, we may not be able to provide professional services to you. Information we collect and use includes:

- **Contact details:** full name of pupil + parent contact details: email address(es), telephone numbers (home and mobile), postal address; where applicable, personal information about persons connected to pupils such as legal guardians/legitimate carers – you must have their authority to provide their information to us;
- **Pupil information:** pupils' date of birth (for safeguarding children, examination and competition entries and other legal requirements); details of pupils' medical/special and educational needs where applicable (to ensure safe practice when teaching, for examination entries);

The purpose of processing (obtaining and storing) information

We collect, use and store personal information only as necessary, for the following purposes:

For **legitimate interests** including:

- **Contact details:** the running of PerformR and the provision of services to our customers, including lesson planning, registers, invoicing, and to monitor the quality of our service;
- **Pupil information:** communication of information to teachers in order for them to carry out their roles including in respect of safeguarding and child protection (eg emergency contacts and medical history for health and safety)
- **Optional information:** used where we have had agreed contact with you and may wish to contact you about events, products/ services and/or news (eg contact details to communicate PerformR news and information);

To carry out activities based on your consent including for quality monitoring, marketing, publicity, (including on our social media pages), for fundraising or other purposes, to help PerformR and its pupils achieve their goals, including photography and videography of pupils.

To comply with **legal obligations** including:

- compliance with legal and regulatory requirements and related disclosures e.g. work with children and vulnerable groups, HMRC
- exercising your rights under data protection law and making rights' requests
- verifying your identity under data protection law, other legal and regulatory requirements and related disclosures.
- the establishment and defence of legal claims and rights

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You have the 'right to object' to legitimate interests relating to you, and can withdraw your consent at any time – see

'Your Rights'. Please note that withdrawal of consent from one activity does not mean withdrawal from other activities you have given consent to. Withdrawal of consent may affect what we can do for you.

Who we share personal data with:

PerformR does not share information with anyone unless relevant and unless the law and our policies allow us to do so. The School uses personal information and/or shares it with third parties for the following purposes:

- as needed for the running of PerformR, including communicating with parents/guardians through for example our newsletters and on social media, unless you have specifically objected to this.
- if required to do so by law or to comply with legal process (eg Courts or tribunals to comply with legal requirements and for the administration of justice, police and law enforcement agencies, the Information Commissioner's Office (ICO)).
- to protect the rights, property, or personal safety of the public emergency services to protect your vital interests
- other parties connected to you where you have given consent to contact them as referees, legal guardians or legitimate carers
- When sending letters or parcels, we will share your postal address with the delivery service.
- Anyone else where we have your consent or as required by law

How long we hold your information for:

We will hold your personal data for as long as necessary to meet the purpose for which it was originally collected. Personal data will be retained as required by law and stored securely. It will then be destroyed and deleted securely, after 7 years.

You have the right to withdraw consent for personal data to be retained at any time, unless the data is required for financial and tax return purposes for the HMRC. To withdraw, contact info@performr.uk

If there is a belief that there is a problem with how their data is handled, please contact PerformR (info@performr.uk) in the first instance. You also have the right to complain to the ICO (Information Commissioner's Office),

Your rights:

- Right to be informed:

You have the right to be informed about the collection and used of your personal data. This Privacy Policy meets this.

- Right to access your personal information and rectify it:

You have the right to request access to information that is held by PerformR. To do this, please write to Leila McQuaid.

- Right to erasure (the 'right to be forgotten'):

You have the right to have your data deleted by us when:

Your personal information is no longer necessary for the purposes we originally collected it for

You have informed us that you've withdrawn your consent and we do not have any legal grounds to continue to hold your data

You object to direct marketing from us

You object to any of the legitimate interests listed above

We did not collect your information lawfully

Where we must comply with legal and regulatory requirements

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We give emphasis to personal information collected from children where they may have joined social media groups and/ or may no longer be a child as they may not have been aware of the risks at the time they may have given consent to us.

Your right to erasure may not apply where we hold your information for one of the following reasons:

- to comply with a legal obligation
- for the performance of a task carried out in the public's interest or in the exercise of official authority
- to exercise the right of freedom of expression and information
- for archiving purposes in the public interest, scientific or historical research or statistical purposes where erasure is likely to render impossible or seriously impair the achievement of these purposes
- for the establishment, exercise or defence of legal claims.

Right to restrict processing:

You have the right to request that we only store your personal information but not use it. This right only applies where:

- you contest the accuracy of your personal information and we are working to verify the accuracy of your information
- we did not collect your information lawfully
- we no longer need your personal information, but you need us to keep it to establish, exercise or defend a legal claim
- you have objected (see "right to object") to us using your personal information and we are considering whether our legitimate grounds override the nature of the objection.

We will not process your restricted information in any way except to store it, unless:

- you give your consent to continue processing it
- it is for the establishment, exercise or defence of a legal claim
- it is for the protection of the rights of another person (natural or legal), or
- it is for reasons of important public interest

Right to object:

You have the right to object to:

- processing based on legitimate interests or the performance of a task in the public interest/exercise of official authority; you must have an objection on 'grounds relating to your particular situation'. We will stop processing your personal information unless we can demonstrate compelling legitimate grounds for holding your information after considering your rights and expectations and/or it is for the establishment, exercise or defence of a legal claim
- direct marketing (including profiling); we will stop processing your personal information as soon as we receive an objection.

You must have "grounds relating to your particular situation" in order to exercise your right to object to processing for research purposes. If we are conducting research where the processing of personal data is necessary for the performance of a public interest task, we are not required to comply with an objection to the processing.

Right to data portability:

You have the right to move, copy or transfer personal data easily from one IT environment to another in a safe and secure way, without hindrance to usability. The right to data portability only applies to personal data an individual has provided to us, and where the processing is based on the individual's consent. We are only able to provide some personal information in CSV format and are unable to provide data portability for data outside this.

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Please make any request in writing to the Office address. We will aim to respond to requests within one month following the date of your request or three months if it is complex to provide it. If we are unable to meet your request we will explain why and you have the right to complain to the Information Commissioner's Office. Where access, rectification, restriction or erasure requests are manifestly unfounded or excessive we may charge a fee or refuse to respond. Where we refuse to respond we will explain why and you have the right to complain to the Information Commissioner's Office.

How to contact us and how to complain:

For data protection matters, you can contact us via post at PerformR, 15 Merewood Close, Bickley, Kent, BR1 2AN, by mobile on 07533043615, or by email on info@performr.uk

You can complain to us using the details above. You also have the right to complain to the Information Commissioner's Office. It has enforcement powers and can investigate compliance with data protection law: ico.org.uk