

# DATA PROTECTION POLICY (SHORT VERSION)

## 1. PRIVACY STATEMENT

We are a data controller and this means that we are required by law to ensure that everyone who processes personal data and special categories of personal data during the course of their work with us does so in accordance with the data protection legislation, including the UK GDPR.

We will ensure that personal data that we hold is kept secure and that it is held for no longer than is necessary for the purposes for which it is being processed. In addition, we will retain the minimum amount of information to fulfil our statutory obligations and the provision of goods and/or services - as required by the data protection legislation, including the UK GDPR.

### 1.1 ABOUT US

Data Controller: Trudi Rees & Sarah Kelly, trading as The School, London

Data Representative: Sarah Kelly

Contact: [theschoollondon@gmail.com](mailto:theschoollondon@gmail.com)

### 1.2 ABOUT THE DATA WE PROCESS

- **Information provided directly by you**, for example via email, verbally, filling in forms, making payments. This can include identity/ contact information, financial information or general information.
- **Information we collect**, for example transactional information, website usage, academic information about attendance/ progress, images or recordings of work.
- **Information collected from third parties**, for example reviews/ tags on social media, technical information that is automatically collected when visiting our website.

### 1.3 OUR REASONS FOR USING YOUR DATA

We must be able to demonstrate a lawful basis for the processing of data. This will usually fall under one of the following categories.

- **Performance of contract**, for example delivery of the training course.
- **Compliance with a legal obligation**, for example tax purposes.
- **Vital interests**, for example emergency contact details or medical information.
- **Legitimate business**, for example marketing purposes.

## 2. RIGHTS FOR DATA SUBJECTS

Under Data Protection legislation, data subjects have the following rights:

- The right to be informed about the collection and the use of their personal data;
- The right to access personal data and supplementary information;
- The right to have inaccurate personal data rectified, or completed if it is incomplete;
- The right to erasure (to be forgotten) in certain circumstances;
- The right to restrict processing in certain circumstances;
- The right to data portability, which allows the data subject to obtain and reuse their personal data for their own purposes across different services;
- The right to object to processing in certain circumstances;
- Rights in relation to automated decision making and profiling;
- The right to withdraw consent at any time (where relevant);
- The right to complain to the Information Commissioner.

### 2.1 ACCESS REQUESTS

Individuals have the right to access their personal data and supplementary information. The right of access allows individuals to be aware of and verify the

lawfulness of the processing. Our organisation must comply with the requirements of the UK data protection legislation which includes the Data Protection Act 2018 and the General Data Protection Regulations (GDPR) and we must be able to demonstrate compliance to the Information Commissioner's Office (ICO).

As the organisation's Data Representative, Sarah Kelly is responsible for the handling of Subject Access Requests (SAR).

- Subject Access Requests can be made in writing, electronically or verbally.
- The requester must supply evidence to prove their identity.
- We must respond to the data subject within 30 days of receiving the request as valid.
- All the information that has been requested must be provided unless an exemption can be applied.

## **2.2 RIGHT OF ERASURE**

Individuals have the right to request erasure of their personal data in certain circumstances. Our organisation must comply with the requirements of the General Data Protection Regulations.

- Right of erasure requests can be made in writing, electronically or verbally.
- We may ask you to supply valid evidence to prove your identity.
- We expect to respond to your request within 30 days of receiving the request as valid.
- Applicable law may allow or require us to refuse to act on your request, or we may have destroyed, erased or made your personal data anonymous in accordance with our record retention obligations and practices.
- If we cannot honour your erasure request, we will inform you of the reason why.