



# Privacy Notice

Approved by:	Just A Sec
Last reviewed on:	20 <sup>th</sup> April 2018
Next review due by:	19 <sup>th</sup> April 2020

If you have any queries or requests concerning this notice or how we handle your data more generally, please get in touch with us by contacting our Data Protection Officer at [judy.thorp@j-a-s.co.uk](mailto:judy.thorp@j-a-s.co.uk)

### **Awareness**

- We are aware of the GDPR Regulations which came into effect on the 25<sup>th</sup> May 2018

### **Information Held by JAS**

- We hold governance data in the form of personal information about individuals to enable them to fulfil their governance role and comply with the requirements of the Getting Information About Schools database, as well as documents such as meeting minutes and school/ academy policies. This data is under the control of the individual and key administrators within the client organisation. This data may be edited or deleted at the request of the individual.
- We will share personal governance documentation and information with the following organisations: educational establishments, Local Authorities, Dioceses and the Information Commissioner's Office
- We also collect information when you contact us including via e-mail, letter or telephone.
- We may voice record meetings for training and service improvement purposes.

### **Communicating Privacy Information**

- We will only process the data we collect about you if there is a reason for doing so, and if that reason is permitted under data protection law. We will have a lawful basis for processing your information:
  - a) if we need to process your information in order to provide you with the service you have requested or to enter into a contract;
  - b) we have your consent;
  - c) we have a justifiable reason for processing your data or we are under a legal obligation to do so.

### **Retention of Your Information**

- We will not retain your information for any longer than we think is necessary.
- Information that we collect will be retained for as long as needed to fulfil the service or laws, such as retaining the information for regulatory reporting purposes.
- When determining the relevant retention periods, we will take into account factors including:
  - a) our contractual obligations and rights in relation to the information involved;
  - b) legal obligation(s) under applicable law to retain data for a certain period of time;
  - c) guidelines issued by relevant data protection authorities.
  - d) we securely erase your information when it is no longer required for the purposes collected.

### **Individual Rights**

- Under data protection law, you may have a number of rights concerning the data we hold about you. If you wish to exercise any of these rights, please contact our Data Protection Officer using the contact details set out above. For additional information on your rights please contact your data protection authority and see below.
  - a) The right to be informed. You have the right to be provided with clear, transparent and easily understandable information about your rights and how we use your

information and, which is why we are providing you with the information in this policy.

- b) The right of access. You have the right to obtain access to your information (if we are processing it). This will enable you, for example, to check that we are using your information in accordance with data protection law. If you wish to access the information we hold about you in this way, please get in touch (see Contact Details).
- c) The right to rectification. You are entitled to have your information corrected if it is inaccurate or incomplete. You can request that we rectify any errors in information that we hold by contacting us (see Contact Details).
- d) The right to erasure. This is also known as 'the right to be forgotten' and, in simple terms, enables you to request the deletion or removal of certain information that we hold about you by contacting us (see Contact Details).
- e) The right to restrict processing. You have rights to 'block' or 'suppress' further use of your information. When processing is restricted, we can still store your information, but will not use it further.
- f) The right to data portability. You have the right to obtain your personal information in an accessible and transferable format so that you can re-use it for your own purposes across different service providers. This is not a general right however and there are exceptions. To learn more please get in touch (see Contact Details).
- g) The right to lodge a complaint. You have the right to lodge a complaint about the way we handle or process your information with the national data protection authority.
- h) The right to withdraw consent. If you have given your consent to anything we do with your information (i.e. we rely on consent as a legal basis for processing your information), you have the right to withdraw that consent at any time. You can do this by contacting us (see Contact Details). Withdrawing consent will not however make unlawful our use of your information while consent had been apparent.
- i) The right to object to processing. You have the right to object to certain types of processing, including processing for direct marketing and profiling.

### **Subject Access Requests**

- In most cases, we will not charge for complying with a request.
- We have a month to comply.
- We can refuse or charge for requests that are manifestly unfounded or excessive.
- If we refuse a request, we will explain to the individual why and that they have the right to complain to the supervisory authority and to a judicial remedy. We will undertake this without undue delay and at the latest, within one month.

### **Lawful Basis for Processing Personal Data**

- We carry out the same processing that the client organisation would carry out, the only difference being that data is stored externally to the organisation. It therefore has a lawful basis on which to process data.

### **Consent**

- In order to enable the individual to fulfil their governance role, data is provided on behalf of the individual to us and therefore it is taken that consent is implicit in the process. Consent is freely given, specific, informed and unambiguous.

### **Children**

- We do not store data for or about children. It is also advised that schools do not provide any documents that contain names or any other details of children.

**Data Breaches**

- The GDPR introduces a duty on all organisations to report certain types of data breach to the ICO, and in some cases, to individuals. We only have to notify the ICO of a breach where it is likely to result in a risk to the rights and freedoms of individuals – if, for example, it could result in discrimination, damage to reputation, financial loss, loss of confidentiality or any other significant economic or social disadvantage. Where a breach is likely to result in a high risk to the rights and freedoms of individuals, we will also notify those concerned directly in most cases.

**Data Protection Officer**

- We have a designated Data Protection Officer, Miss Judy Thorp.

**International**

- We operate within the UK and do not carry out any cross-border data processing.

**Changes to Our Privacy Notice**

- Any changes to our privacy notice will be posted to our website and, where appropriate, we will notify you of the changes for example by email.

**Complaints**

- If you are not satisfied with our response to any complaint or believe our processing of your information does not comply with data protection law, you can make a complaint to the Information Commissioner's Office (ICO) using the following details:

Address: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF

Telephone number: 0303 123 1113

Website: [www.ico.org.uk](http://www.ico.org.uk)

Just A Sec (Greater Manchester) Limited, 467 Chester Road, Woodford, Stockport, Cheshire, SK7 1PR