

Privacy Policy – Back to School Grant

Version control

<u>Version No</u>	<u>Authors</u>	<u>Changes</u>	<u>Date</u>	<u>Approved by</u>	<u>Date of approval</u>
V1.0	Irene Okoro & Charlene Edwards	New Policy	05/08/2020		

1. Introduction

At Penny Appeal, we are committed to respecting your data privacy. The Data Protection Act 2018 (“DPA”) and the General Data Protection Regulation (GDPR) require that we provide you with information about how and why we use personal data. We aim to process information about you fairly, lawfully, and in a transparent manner and the aim of this document is to provide you with sufficient information for you to understand what we are doing with your personal data. This policy also explains our commitment to protecting your personal data and your rights towards those data. Please read it carefully to understand our views and practices regarding your personal data and how we will use it.

The controller of your data is Penny Appeal of Cross Street Chambers, Cross Street, Wakefield, WF1 3BW. References to **we**, **our** or **us** in this policy are to the controller, Penny Appeal.

Our Data Protection Advisor oversees our compliance with this policy. They can be contacted using the contact details below.

2. Personal Information we may collect about you

We collect information about you in the following ways:

Personal data you provide to Penny Appeal directly

You may provide us with information about you when apply for a grant. This may include your name, address, email address, telephone number, email address, bank account details, child’s name, child’s school, child’s school year, employment status (furloughed, reduced hours, redundant), ethnicity.

Information collected by your involvement with Penny Appeal

Your activities and involvement with Penny Appeal will result in personal data being collected. When you use our website, we will collect personal information about you using cookies and other digital media technologies details of which are contained in our Cookies Policy. We will receive and store information about the type of device you use to access our website, what operating system you have, some of your device settings and your IP address.

3. Lawful basis for processing

Our lawful basis for processing your personal data is based on the following:

- a. **Consent:** you have given consent for the processing for one or more specific reasons, by entering the application process
- b. **Legitimate interests:** the processing is necessary for the controller’s legitimate interests, or the legitimate interests of a third party however, such interests are overridden by the interests or fundamental rights and freedoms of the data subject which requires protection of the personal data

4. How we use your personal information

The table below describes the main purposes for processing your personal information and our lawful basis for doing so.

<i>Personal data</i>	<i>Our Purpose</i>	<i>Our Lawful basis</i>
Parent/carer’s name, address, telephone number, email address, employment status (furloughed, reduced hours, redundant)	To determine eligibility for a grant payment.	Consent

Parent/carer's bank account details	To make a grant payment if eligible	Legitimate interest
Child's name, date of birth, gender, school attended, school year attending	To determine eligibility for a grant payment.	Consent
Confirmation of Black, Asian or Minority Ethnic status	To confirm eligibility for a grant payment	Consent

5. Sharing your data

We may share your personal data with your child/children's school to confirm payment of school meals. We may also share some data with the company that provides your child/children's school uniform to authorise payment for the school uniforms.

Please note that we may need to disclose your personal information to:

- Police, law enforcement and security services, for the prevention of crime, in the event of suspected or actual fraud, to assist with the investigation.
- protect our rights, including the exchange of information with other companies, organisations and/or governmental bodies for the purposes of fraud protection, etc.
- Companies in the same group of companies as us, to provide a service to you.
- Where we have a responsibility for accounting or statistical reporting purposes, or to enforce or apply our terms and conditions

If you provide us with any personal information other than your own you, are responsible for ensuring they know that you have done this and for providing them with access to this privacy policy.

6. Transferring your data internationally

We do not envisage a situation where we will transfer your data outside of the United Kingdom and the European Economic Area (EEA).

7. How long we keep your personal information for

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements and we will review this from time to time. We will retain your information and personal data for the current school year and then for 12 months afterwards.

8 Your Rights in relation to personal information

8.1 You have the following rights concerning your personal data:

Rights	Brief Explanation
Right to be informed	We are required to inform you that we are processing your personal data and our reasons for doing so. This Privacy Policy has that information.
Right of access	You have the right to ask us for copies of the personal data we hold about you.
Right to rectification	If you feel that any data we hold about you is incorrect, you have the right to ask us to correct it.

Right to erasure	You have the right (not in all cases) to ask us to delete personal data we hold about you.
Right to restriction of processing	You have the right (not in all cases) to ask us to stop processing your personal data.
Right to data portability	You have the right (not in all cases) to ask us to provide you your personal data in a structured and machine-readable format, that will allow you to transfer it to another controller.
Right to withdraw consent	Where we are relying on your consent to use your personal data, you have the right to withdraw your consent at any time. Please note that this will not affect how we have already used your personal data before you withdrew your consent.
Right to object to direct marketing	You have the right to ask us to stop using your personal data for direct marketing purposes.
Rights in relation to automated decision making and profiling	We do not perform any automated decision-making based on personal data that produces legal effects or similarly significantly affects you.

8.2 For more information on your rights, visit the ICO website on <https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/>

9 Profiling and automated decision making

Penny Appeal will not carry out any automated profiling using your personal data.

10 Your right to lodge a complaint

If you are not happy about how Penny Appeal is using your personal data, please first let us know by contacting us using the details below:

Email: dataprotection@pennyappeal.org

Phone: 03000 11 11 11

Post: Data Protection Advisor, Penny Appeal, Cross Street Chambers, Cross Street, Wakefield WF1 3BW.

If you are still unhappy after we have addressed your concern, you can contact Information Commissioner's Office (ICO) using details below:

Information Commissioner's Office

Post: Wycliffe House, Water Lane, Wilmslow. Cheshire. SK9 5AF

Phone: 0303 123 1113

Email: casework@ico.org.uk

Website: <https://ico.org.uk/make-a-complaint/>

11 Changes to This policy

We may update this privacy policy from time to time, where there has been a change in data protection regulation. We will publish the updated version on our website.

Last updated August 2020.