

# Friends of Vallajeelt School Privacy Notice - GDPR

## Privacy Notice for the Friends of Vallajeelt School

The Friends of Vallajeelt School is an Isle of Man registered charity (No. 586) with the objective to advance the education of the pupils of Scoill Vallajeelt, provide and assist in the provision of the facilities for education at the school (not normally provided for by the Department of Education, Sport and Culture), and to engender links between the school and the local community.

### ***Our details***

Data Controller: The Friends of Vallajeelt School (Isle of Man registered charity (No. 586))  
 Registered Address is: 2 The Meadows, Saddlestone, Douglas, Isle of Man IM2 1NQ  
 Phone: +44 1624 670844  
 Email: info@fsv.im

This privacy notice explains how we collect, store and use personal data.

| <b>Type of information</b>  | <b>Purpose of processing</b>   | <b>Lawful basis for processing</b> | <b>Legitimate interest assessment</b> | <b>Retention</b>   | <b>Access required by</b> | <b>Where it is stored</b>    |
|---|--|------------------------------------|---------------------------------------|--|---------------------------|------------------------------|
| Committee members contact details - name, telephone, email  | To ensure the effective running of the committee   | Consent                            | Yes, it is legitimate                 | Reviewed each AGM  | Committee members         | Secretary's secured records. |
| List of parents wishing to be included in the meeting notifications and receive minutes of said meetings. - name, email | To communicate with a specific group who opt in to go on the meetings mailing list.                                  | Consent                            | Yes, it is legitimate                 | Volunteers opt in to be on the Friends of Vallajeelt School Distribution List. Volunteers can opt out at any time by replying to one of the emails or emailing Secretary at <a href="mailto:info@fsv.im">info@fsv.im</a> . Once opted out the details are deleted immediately. | Secretary                 | Secretary's secured records. |
| Class rep details - name, telephone, email, class   | To forward on relevant Friends of Vallajeelt School event / activities / product information (upcoming events, etc.) | Consent                            | Yes, it is legitimate                 | Parents who volunteer to be the current Class Rep opt in to be on the Friends of Vallajeelt School's Class Rep Distribution List.* <sup>1</sup>  | Committee members         | Secretary's secured records. |

| Type of information   | Purpose of processing   | Lawful basis for processing | Legitimate interest assessment | Retention  | Access required by           | Where it is stored   |
|---|---|-----------------------------|--------------------------------|--|------------------------------|--|
| Contact details on competition forms  | To contact winners of events  | Consent                     | Yes, it is legitimate          | Destroyed once the event is complete and the winners notified.                                     | Nominated lead for the event | Paper copies held by nominated lead or Secretary's secured records.                  |
| Details of monetary donations / payments for events including card & bank details | To know the source of our donations in order to administer the donation | Consent, Legal Obligation   | Yes, it is legitimate          | Please see SumUp's privacy notice on data retention.   | Treasurer                    | SumUp's secure servers, reports on Treasurer secured records.                        |
| Details of event registration information   | To provide coordination and organisation for events.* <sup>2</sup>      | Consent                     | Yes, it is legitimate          | Please see TicketSource's privacy notice on data retention, local copies are destroyed post-event. | Treasurer                    | TicketSource's secure servers, reports on Treasurer secured records and hard copies. |
| Artwork product organisation  | To organise and coordinate Christmas artwork projects                   | Consent                     | Yes, it is legitimate          | Please see APFS privacy notice – typically 12 months, local copies destroyed post-activity.        | Treasurer                    | APFS's secure servers, reports on Treasurer secured records and hard copies.         |

*Table 1: types of information processed*

\*<sup>1</sup> Note: The parent contact details for each class are stored by the school. Parents opt in to be on the distribution list and they can opt out at any time by contacting the School Secretary. Friends of Vallajeelt School does not have access to this data.

\*<sup>2</sup> Note: For events run by the Friends of Vallajeelt School where children are left unaccompanied by a guardian, the Friends of Vallajeelt School will request contact details for a parent, pick-up arrangements for participating children, medical details and dietary requirements of participating children.

### ***Why is data collected?***

Friends of Vallajeelt School only collects personal data for specific needs. Put simply the data will only ever be used to coordinate and organise events / activities and products, to provide effective communication with parents and carers for the reconciliation of payments / provision of prizes where applicable. We do not collect data for any other reason. We will only hold data for the time that is required and regularly check that it is still required. We will not share your data with any third parties beyond the partners that are detailed in this notice.

We will make it clear why we are collecting someone's data, what we are asking them to consent to and how they can withdraw their consent.

Our Privacy Notice is available through the Friends of Vallajeelt School website.

### ***How is data collected?***

As can be seen from table 1 above, most of the time we obtain personal information by consent.

We communicate directly with volunteers and never ask the school for individual personal information.

The school may send messages on behalf of Friends of Vallajeelt School to the whole school community. Friends of Vallajeelt School does not hold this contact information as this data is managed by the school office. We may ask the Class Reps or School Secretary to forward on Friends of Vallajeelt School information to their Class Distribution Lists. Friends of Vallajeelt School does not hold the class list contact information nor has access to it.

If your child is attending a Friends of Vallajeelt School event, depending on the type of event, we may require certain information as a condition of attendance e.g. if they are being left unaccompanied.

### ***For what purpose does the Friends of Vallajeelt School uses personal data?***

Friends of Vallajeelt School collects the personal data described above in order to:

- ensure the effective running of the committee
- communicate the details of upcoming meetings, events, activities and information about Friends of Vallajeelt School to you
- communicate with a specific group of volunteers who opt in to help Friends of Vallajeelt School with specific events / activities
- communicate and engage with you (and other parents/carers) in group messages set up (on regular messaging platforms, e.g. WhatsApp, Facebook Messenger, phone or email) for the purpose of facilitating events and/or activities
- Corresponding with you in response to an enquiry you have made to us
- share opportunities with you (or your business) to sponsor or provide a service for a Friends of Vallajeelt School organised event, activity or product
- keep a record of your response(s) to our volunteer forms
- notify you of the results of any raffle, competition, promotion or survey
- process and administer your order for any product supplied or arranged by us, including management of any payments to or from us where applicable, e.g. event registrations using TicketSource and Sumup
- manage our relationship with you, which will include notifying you of the AGM, meetings, changes to any policies etc if applicable
- administer and protect Friends of Vallajeelt School, including ensuring compliance with any legal or regulatory obligations that we may be subject to incl. knowing the source of monetary donations for accounting purposes
- Information that is essential to protect the vital interests of a person/persons, for example regarding a life-threatening allergy or medical condition, data may be required by Friends of Vallajeelt School for the purposes of running an event. We will always ask for consent to hold this data.

### ***What personal data does Friends of Vallajeelt School collect?***

Friends of Vallajeelt School may collect personal data that you have chosen to share directly with us. Personal data is information that identifies you as an individual and can include:

- Your First name and Surname
- Email address(es)
- Address(es) (only for card verification which is performed at the payment provider)
- Phone number(s)
- Payment method(s) with redacted card details, e.g. last 4 digits.
- First Name and Last name of child / children
- School year of child / children
- Information about allergies for child / children where applicable
- Other event related information such as “allowed to walk home / being picked up”

Friends of Vallajeelt School will not collect any more data than is needed, and that data will be discarded once its purpose has been served (e.g. event registrations). Please note that our partner providers will have their own privacy notices for the data that is kept on their systems.

## ***On what basis does Friends of Vallajeelt School collect and use personal data?***

Friends of Vallajeelt School collects and uses personal data on the basis of:

- Consent - where the parent/carer has given specific permission (e.g. to be on relevant distribution lists)
- Legitimate Interest - this includes our interests in managing our relationship with you and running Friends of Vallajeelt School. The provision of and administering of events, activities and products of Friends of Vallajeelt School (including prize winners). To grow and develop Friends of Vallajeelt School and the services it offers/provides to the school community and to ensure compliance with any applicable policies, practices or procedures.
- Legal Obligation - as an Isle of Man Registered Charity (No. 586) Friends of Vallajeelt School has a legal obligation to send its committee members' details to the Isle of Man Government Charities Administration. Financial transaction analysis will also be kept for accounting reasons.
- We may also process data to perform a contractual obligation with you as a Friends of Vallajeelt School supplier or sponsor.

## ***Sharing data***

Where we offer you the option of using a third-party websites (please see Table 2 below) you choose to share your data with them in line with their own data protection policies which can be viewed on their websites. In most cases the data for event registrations is supplied to Friends of Vallajeelt School via those sites (unless data is provided to Friends of Vallajeelt School directly via direct contact). All other links to sites such as Stickins® MyNameTags, GiveAsYouLive and Scholastic; data provided by you to those sites is not shared with Friends of Vallajeelt School.

For Friends of Vallajeelt School products that are created by a third-party organisation for example Arts Projects for Schools (APFS) products in the Christmas period, we will only share with these organisations the minimum information required in line with our contractual obligations in order to fulfil the delivery of the product(s). In the case of using APFS, the billing is dealt directly between the parents / carers and APFS, however required information of the children is required by Friends of Vallajeelt School in order to coordinate effective processing and delivery of the artwork.

We do not otherwise share or sell your personal data to any other organisation.

Personal data will be shared between Friends of Vallajeelt School committee members where required for the purposes of running an event or activity such as a staffing rota, an event attendance list, or a planning meeting, where you have expressed interest in being involved. We may also share information with Scoill Vallajeelt where there is a legitimate interest in doing so.

You have the right to request that any out of date, inaccurate or irrelevant information is erased or corrected (subject to certain exemptions and limitations under data protection legislation). Please see below for how to contact us.

| <b>Name and site of partner provider</b>                               | <b>Data collected at source</b>  | <b>Direction of data</b>                      | <b>Data passed to Friends of Vallajeelt School</b>   | <b>Description</b>   |
|--|--|---|--|--|
| Sumup<br>( <a href="https://www.sumup.com">https://www.sumup.com</a> ) | <input type="checkbox"/> First name and Surname<br><input type="checkbox"/> Email address(es)<br><input type="checkbox"/> Address(es) [for payment validation only]<br><input type="checkbox"/> Phone number(s)<br><input type="checkbox"/> Payment method(s) with redacted card details<br><input type="checkbox"/> Date(s) of transaction(s) | From provider to Friends of Vallajeelt School | <input type="checkbox"/> First name and Surname<br><input type="checkbox"/> Email address(es)<br><input type="checkbox"/> Phone number(s)<br><input type="checkbox"/> Payment method(s) with redacted card details<br><input type="checkbox"/> Date(s) of transaction(s) | Event based secure payment provider, providing payment and reporting services for events / activities / products offered by Friends of Vallajeelt School |

| Name and site of partner provider   | Data collected at source  | Direction of data                             | Data passed to Friends of Vallajeelt School   | Description   |
|---|---|---|---|---|
| TicketSource<br>( <a href="https://ticketsource.co.uk">https://ticketsource.co.uk</a> )                 | <input type="checkbox"/> First name and Surname<br><input type="checkbox"/> Email address(es)<br><input type="checkbox"/> Phone number(s)<br><input type="checkbox"/> First Name and Last name of child / children<br><input type="checkbox"/> School year of child / children<br><input type="checkbox"/> Information about allergies for child / children<br><input type="checkbox"/> Event specific requirements<br><input type="checkbox"/> Consent given | From provider to Friends of Vallajeelt School | <input type="checkbox"/> First name and Surname<br><input type="checkbox"/> Email address(es)<br><input type="checkbox"/> Phone number(s)<br><input type="checkbox"/> First Name and Last name of child / children<br><input type="checkbox"/> School year of child / children<br><input type="checkbox"/> Information about allergies for child / children<br><input type="checkbox"/> Event specific requirements<br><input type="checkbox"/> Consent given | Questionnaire based Events provider providing organisation and coordination for events and activities offered by Friends of Vallajeelt School |
| Stikins®<br>( <a href="https://www.stikins.co.uk">https://www.stikins.co.uk</a> )                       | Please see Stikins privacy notice   | n/a   | None  | 3 <sup>rd</sup> party supplier providing fundraising commission   |
| MyNameTags<br>( <a href="https://www.mynametags.com">https://www.mynametags.com</a> )                   | Please see MyNameTags privacy notice  | n/a   | None  | 3 <sup>rd</sup> party supplier providing fundraising commission   |
| GiveAsYouLive<br>( <a href="https://www.giveasyoulive.com">https://www.giveasyoulive.com</a> )          | Please see GiveAsYouLive privacy notice   | n/a   | None  | 3 <sup>rd</sup> party cashback site providing fundraising commission  |
| Scholastic<br>( <a href="https://shop.scholastic.co.uk">https://shop.scholastic.co.uk</a> )             | Please see Scholastic privacy notice  | n/a   | None  | 3 <sup>rd</sup> party book supplier providing fundraising commission  |
| Arts Projects For Schools (APFS)<br>( <a href="https://www.apfs.org.uk/">https://www.apfs.org.uk/</a> ) | <input type="checkbox"/> Bill payer contact details<br><input type="checkbox"/> Artwork codes<br><input type="checkbox"/> First Name and Last name of child / children  | From provider to Friends of Vallajeelt School | <input type="checkbox"/> First Name and Last name of child / children   | 3 <sup>rd</sup> party artwork provider  |

Table 2: list of partner providers, the types of data collected and shared and the direction

## ***Managing and storing data***

We will ensure all data that you give us is kept securely and restricted to those with a legitimate need to know. We are committed to protecting information about you and your children.

Data supplied to or held by the Friends of Vallajeelt School will be stored securely in a two factor protected online secure file sharing system, which is compliant with data protection legislation. We do not transfer personal data outside of the European Economic Area unless it is lawful to do so under data protection legislation. Where committee members have access to personal data such as an email address or telephone numbers, they may store this on a personal device for as long as is necessary for a legitimate purpose before transferring the data to our secure storage system, or securely deleting the data, whichever is most appropriate.

Friends of Vallajeelt School will keep your personal data for as long as it is necessary for a legitimate purpose. Any kept data will be destroyed within 3 months of the related event or activity and at most kept for no longer than one academic year. A limited amount of information about payments may have to be kept to comply with tax and financial reporting law, usually for 6 years from the end of the current tax year.

## ***Your Rights***

Data protection legislation gives you several rights regarding your information:

- You have the right to withdraw consent, where given.
- You can ask what information we hold about you and be provided with a copy. We will also give you extra information such as why we use this information, where it came from and if it has been shared. You should be aware that the right of access is limited to your own personal data, and certain data is exempt from the right of access, including information which identifies other individuals.
- You can ask us to delete the information that we hold about you in certain circumstances, for example where we no longer need the information.
- In some cases, you can ask us to amend the personal data we hold, or have it transferred to others, or for Friends of Vallajeelt School to stop processing it - but subject to certain exemptions and limitations. We will sometimes have compelling reasons to refuse specific requests to amend, delete or stop processing your personal data: for example, a legal requirement. All such requests will be considered on their own merits.
- You can ask us to send you, or another organisation, certain types of information about you in a format that can be read by computer.
- Our use of information about you may be restricted in some cases, for example if you tell us that the information is inaccurate, we can only use it for limited purposes while we check its accuracy.

## ***Accessing your data***

If you want to find out what data we hold about you or your child, please contact the Secretary of Friends of Vallajeelt School at [info@fsv.im](mailto:info@fsv.im). We are happy to share it with you at any time and you can also ask us to delete your data from our records at any time.

We will respond to any such written requests as soon as is reasonably practicable and in any event within statutory time-limits, which is one month in the case of requests for access to information.

### ***More information***

Please contact us on [info@fsv.im](mailto:info@fsv.im) if you have any questions about this Notice or the information we hold about you.

Friends of Vallajeelt School will update this Notice from time to time, and any substantial changes that affect how we use your personal data will be notified on Scoill Vallajeelt's website and to you directly as far as is possible.

You can also read more about GDPR (for the Isle of Man) - Data Protection & GDPR Isle of Man web site. <https://www.gov.im/about-the-government/data-protection-gdpr-on-the-isle-of-man/>