

# Privacy Notice – External Hirers



## 1. Definitions

**Data controller-** a controller determines the purposes and means of processing personal data. For the purposes of this Privacy Notice, Bradford Grammar School is the data controller.

**Data processor-** a processor is responsible for processing personal data on behalf of a controller.

**Data subject–** natural person. For the purposes of this Privacy Notice the Data Subjects are customers of the school, consisting of individuals who are members of, attend, or are staff of clubs, organisations, and entities.

**Special categories personal data-** the General Data Protection Regulation (“GDPR”) refers to sensitive personal data as ‘special categories of personal data’ (as explained in Article 9 of GDPR). The special categories specifically include genetic data, and biometric data where processed to uniquely identify an individual. Other examples include racial and ethnic origin, sexual orientation, health data, trade union membership, political opinions, religious or philosophical beliefs.

**Processing-** means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure, or destruction.

**Third party-** means a natural or legal person, public authority, agency, or body other than the data subject, controller, processor and persons who, under the direct authority of the controller or processor, are authorised to process personal data.

## 2. Who are we?

Bradford Grammar School Commercial Activities (BGSCA) is the lettings agent of Bradford Grammar School (BGS). BGS is an outstanding UK independent grammar school, which believes in providing every opportunity for its Junior and Senior pupils. We embrace academic, sporting, and creative excellence within an aspirational, caring environment, which builds on our heritage while looking to the future. We nurture exciting and fulfilling lives shaped by our School’s traditional values, and believe happiness is the key to an individual’s success. We are at ease with excellence.

Our Charity registration number is 529113, and we are registered at Bradford Grammar School, Keighley Road, Bradford, BD94 JP.

We are committed to protecting and respecting your privacy. This statement explains when and why we collect personal information, how we use it, the conditions under which we may process it, and how we keep it secure.

### **3. What is Personal Data?**

Personal data is information which relates to an individual and from which he or she can be identified either directly or indirectly through other data which the School has, or is likely to have in its possession.

These individuals are sometimes referred to as data subjects. Personal data does not include information about companies and organisations.

### **4. What do we hold?**

We collect, hold, and share such information as:

- Personal details (date of birth, email, home address and phone numbers),
- DBS certificate numbers and issue dates
- Bank account details (when payments are made from personal accounts)
- Professional qualification and certification details

We may sometimes refer to publicly available sources, such as a club or organisation's website, for further information or to check names and contact details.

### **5. Collecting, Handling, and Sharing Personal Data**

We collect and store your information for the following reasons:

- To ensure we have accurate details that allow us to contact you about your hire.
- To evidence that your staff are DBS certified.
- In some cases, to evidence the attendance of our own pupils and BGS families.
- To evidence professional qualifications.

Personal information is stored securely in our system, accessible only by the Data Processor, who in most cases will be the representative of BGSCA, and the schools IT department.

Personal information will never be passed on to others without your express permission, except when required by law.

However, unless you request otherwise, your Data may be made available to third parties to the extent necessary for any of the purposes set out above. These third parties include school staff and departments.

### **6. Purposes for which we use Personal Data**

We process personal data to support BGSCA's operation as a legally compliant lettings agent of the school.

We may process special categories of personal information where it is needed in the public interest and/or for safeguarding purposes, or where there is a legitimate or legal requirement, such as for track and trace purposes.

At BGS, we have an obligation to do our utmost to ensure the safety of anyone who enters our site, including visitors as much as pupils and staff. Collecting and storing your information enables us to do this.

## **7. What is the lawful basis on which we will use this information?**

We also use your data for the following purposes:

- to perform/administer any contract that we have entered into with you
- where the processing is necessary for the purposes of our legitimate interests or those of a third party, except where such interests are overridden by your interests or fundamental rights or freedoms
- where relevant and required, we may process your information as a legitimate and legal requirement within the Government's track and trace process.

In order to comply with the GDPR, we will inform you whether you are required to provide certain personal data to us or if you have a choice in this.

We will store any information in accordance with our Data Protection and Data Retention policies.

## **8. Your Rights**

Under data protection legislation, you have the right to request access to information about you that we hold. To make a request for your personal information, contact our Data Protection Manager who is Mrs Homera Najib, Bursar and Clerk to the Governors, via [dataprotection@bradfordgrammar.com](mailto:dataprotection@bradfordgrammar.com) or by post to the address listed in point 1.

If any of the information we hold is incomplete or inaccurate, please contact us at [dataprotection@bradfordgrammar.com](mailto:dataprotection@bradfordgrammar.com), and we will correct it. We will endeavour to provide you with requested information within one month. If we do refuse a request, we will advise you accordingly within one month.

You also have the right to:

- object to processing of personal data that is likely to cause, or is causing, damage or distress
- withdraw your consent to the processing (where we are processing your personal data on the grounds of your consent)
- prevent processing for the purpose of direct marketing
- object to decisions being taken by automated means
- in certain circumstances, have inaccurate personal data rectified, blocked, erased or destroyed; and
- claim compensation for damages caused by a breach of data protection legislation

If you have a concern about the way we respond to your request or wish to complain about this or how we are collecting or using your personal data, we request that you raise your concern with us in the first instance at [dataprotection@bradfordgrammar.com](mailto:dataprotection@bradfordgrammar.com) or, without

prejudice, you have the right to lodge a complaint direct to the Information Commissioner's Office if you have any concerns in relation to our information rights practices via <https://ico.org.uk/concerns/>.

## **9. Use and Storage of your information Overseas.**

Your information may be transferred to, stored, and processed outside the European Economic Area (EEA). We will not transfer your information outside the EEA unless it is to a country which is considered to have equivalent data protection laws or where we have taken all reasonable steps to ensure the recipient of your personal data has suitable standards in place to protect your information.

## **10. Changes to our Privacy Policy**

We may change this Policy from time to time. Any changes made to the policy will be clearly detailed within this section. This Policy was last updated in April 2022.

## **11. Website Third Party Links**

Our website may contain links to other websites run by other organisations. This Privacy Policy applies only to our website, so we encourage you to read the privacy statements on any other websites you visit.

We cannot be responsible for the privacy policies and practices of other sites even if you access them using links from our website. We do not endorse the content of any external sites and we are not responsible or liable, directly or indirectly, for any loss however caused to you by your use of any external site.

## **12. Miscellaneous**

The information on this website is for residents of the UK only. These Terms shall be governed by and construed in accordance with English law and the English courts shall have jurisdiction over any disputes between us.

## **13. Contact Us**

Any questions regarding this Policy and our privacy practices should be sent in the first instance via [amos@bradfordgrammar.com](mailto:amos@bradfordgrammar.com), or in writing to Ashley Moss, Health & Safety Officer, Bradford Grammar School, Keighley Road, Bradford, BD9 4JP.