

1. Overview

We ask that you read this privacy notice carefully as it contains important information on who we are, how and why we collect, store, use and share your personal information, your rights in relation to your personal information and how to contact us and the Information Commissioners Office in the event you have a complaint. From 25 May 2018, Polish Letter Academy - Polish School in Bromley shall process your personal data in accordance with the General Data Protection Regulations (GDPR) and the Data Protection Act 2018.

Our main establishment is based at:
Polish Letter Academy - Polish School in Bromley
St Georges CE Primary School, Tylney Road, BR1 2RL

2. Types of personal data we process

We process personal data about prospective, current and past pupils, their parents, also staff, suppliers and contractors, donors, friends and supporters and other individuals connected to or visiting Polish Letter Academy - Polish School in Bromley. The personal data we process takes different forms, it may be factual information, expressions of opinion, images or other recorded information which identifies or relates to a living natural individual.

Examples include:

- names, addresses, telephone numbers, e-mail addresses and other contact details;
- family details;
- nationality
- admissions, academic, disciplinary and other education related records, information about special educational needs, references, examination scripts and marks;
- education and employment data;
- images, audio and video recordings;
- financial information;
- courses, meetings or events attended.

3. Special category of personal data

Some of your personal data is considered to be special category of personal data under the GDPR. Examples of special category of personal data include: racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, sexual orientation, health and the processing of genetic and biometric data. We would only process and share these categories of personal data with your express permission or if there is a special legal reason (such as a request for the information by a court).

4. Why we hold and process personal data

When you enrol at Polish Letter Academy - Polish School in Bromley, you enter into a contractual agreement however on occasion we may require your consent to process your personal data. Polish Letter Academy - Polish School in Bromley holds personal data for the following reasons:

- information we are required to collect by law or to claim funding;
- information we need to deliver your chosen course of study and monitor progress;
- information we need to confirm prior attainment;

- additional information that will allow us to personalise our support to meet your individual needs;
 - information we use for marketing, communications, event registrations and advice; • information we gather to provide facilities and ensure security (such as CCTV video).
- The first data protection principle requires that Polish Letter Academy - Polish School in Bromley must have a legal basis for processing your personal data. Under GDPR, this “legal basis” for processing conditions must be communicated to you, alongside the type of processing they relate to, as part of this privacy notice. As GDPR is a new law, the conditions identified below may be subject to change as more guidance is given or precedents are set. Polish Letter Academy - Polish School in Bromley will process your data under the following legal basis:
- Consent
 - Contract
 - Compliance with a legal obligation
 - Legitimate interest

5. When we will share personal data

We may share your information with third parties who provide a service for those eligible for support fund awards. When you enrol at Polish Letter Academy - Polish School in Bromley you enter into an agreement and are responsible for the payment of any fees, therefore if necessary, we may transfer your personal data to an agent for the purposes of debt collection. On occasion we may also be required to share your information with the police or other law enforcement agencies. At no time will your personal data be passed to other organisations for marketing or sales purposes.

As an education institution receiving sponsored funding, we may be required to share personal data with awarding organisations, local and national government bodies and public sector agencies where legally required.

6. Transfer of data out of the European Economic Area (EEA)

Polish Letter Academy - Polish School in Bromley do not transfer your personal data outside of the EEA.

7. How long we retain your personal data

A retention schedule of personal data can be viewed at Appendix A

8. Your rights

When exercising your rights as a data subject it will be necessary for Polish Letter Academy - Polish School in Bromley to confirm your identity, the following are examples that Polish Letter Academy - Polish School in Bromley would accept in facilitating your request:

photocopy of driving licence or birth certification, passport, etc.

- Access to information

At any point you can contact us to request details concerning the information we hold about you, why we have that information, who has access to the information and where we got the information. In most cases you may be entitled to copies of the information we hold concerning you. Once we have received your request we will respond within 30 days.

- Rectifying data

If the data we hold about you is out of date, incomplete or incorrect, you can inform us and we will ensure that it is updated.

- Erasing data

If you feel that we should no longer be using your data or that we are illegally using your data, you can request that we erase the data we hold. When we receive your request, we will confirm whether the data has been deleted or tell you the reason why it cannot be deleted.

- Restricting processing

You have the right to request that Polish Letter Academy - Polish School in Bromley stops processing your data. Upon receiving the request, we will contact you to tell you if we are able to comply or if we have legitimate grounds to continue. If data is no longer processed, we may continue to hold your data to comply with your other rights.

- Data portability

You have the right to request that we transfer your data to another organisation. Once we have received your request, we will comply where it is feasible to do so.

- Object to direct marketing

All communication with you, including in relation to updates to this privacy notice, will be made via the preferred method of communication that you have registered with us and you will be able to select the type of correspondence you receive. If, at any stage, you are concerned about the content (e.g. unwanted marketing), frequency (too many) or method (change preference) of these communications, you can unsubscribe or notify us of your decision at any time.

- The right to object to automated decision making / profiling

You have the right not to be subject to automated decision making (making a decision solely based on automated means without any human involvement) and profiling (automated processing of personal data to evaluate certain things about the individual).

- Withdrawing consent

In those cases where we need your consent to process your information, we will ask you to make a positive indication (e.g. to tick a box or insert your contact details on the relevant form or web page requiring consent). By actively providing us with your consent, you are stating that you have been informed as to the type of personal information that will be processed, the reasons for such processing, how it will be used, for how long it will be kept, who else will have access to it and what your rights are as a data subject and that you have read and understood this privacy policy. Where processing is based on consent, you have the right to withdraw consent at any time.

9. Lodging a complaint with the Information Commissioners Office

Should you be dissatisfied with Polish Letter Academy - Polish School in Bromley's processing of your personal data, you have the right to complain to the Information Commissioner's Office. For more information, please see the Information Commissioner's web site: <https://ico.org.uk/>

10. Data Protection Officer

If you have any questions which you feel have not been covered by this Privacy Notice, or if you have concerns or a complaint in relation to Polish Letter Academy - Polish School in Bromley processing your personal data, please do not hesitate to email us at info@polskaszkolawbromley.co.uk

Appendix A – Retention Schedule

Personal Data type	Description	Min period retained	Max period retained
Recruitment Data	Expressions of interest in courses and open day information	12 Months	24 Months
Application data	Application forms, interview information	12 months after cessation of relationship	2 years after student leaves
DBS disclosure	Information relating to criminal records	6 months after checking	3 years for applications processed up until February 2018 6 months after checking for applications processed after February 2018
Core academic data	Transcript like information and basic verification information relating to the individual	Perpetuity	Perpetuity
Reference data in addition to core academic data.	Attendance registers, emails with parents regarding individual pupils	1 year after pupil leaves	2 years after pupil leaves
Audit/professional/statutory data	Health and safety records, verification data required by professional body or HEFCE audit	As required	As required
Course information	Programme and Module specifications	Perpetuity	Perpetuity
Quality Assurance	Parent surveys, module reviews, programme reviews, minutes of meetings, Exam papers etc.	Current academic year plus 1	None unless individuals are identified