



Privacy and Confidentiality Policy for the Public and Collaborators.

Policy Statement

At Portsmouth Forest School CIC, we are committed to respecting the confidentiality and privacy of all children, parents, and visitors. This policy outlines how personal information is collected, stored, used, and shared in compliance with legal obligations and best practice

Aims

- To ensure all personal and sensitive information is handled securely and appropriately.
- To comply with relevant data protection laws, including the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018 and the Portsmouth Forest School CIC policies.
- To build trust by safeguarding the privacy of children, families, adult participants and visitors.

Scope

This policy applies to all personal information collected and processed by Portsmouth Forest School CIC, including information about:

- Children and their families, adult participants and visitors.

The personal data we collect about you

Personal data, or personal information, means any information about an individual from which that person can be identified:

- Name
- Date of Birth
- Email address
- Address
- Phone number
- Business name
- Financial details
- Personal data you post on our website
- Health or Special Educational Needs
- Language and Cultural Needs
- Data about how you use our website
- Technical data such as your IP address, details about your browser, length of visit to pages on our website, page views and navigation paths, details about the number of times you use our website, time zone settings and other technology on the devices you use to access our website
- Your marketing and communication preferences
- Any other information that you directly provide to us whether through our contact form, over the phone, by email or otherwise

We do not collect any **Special Categories of Personal Data** about you except what has been mentioned above (this includes details about your religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your genetic and biometric data).



Please keep us informed if your personal data changes during your relationship with us. It is important that the personal data we hold about you is accurate and current.

How we use your personal information

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data for:

Legitimate Interest – this means the information required by Portsmouth Forest School CIC to efficiently and safely plan and run our services. We'll only collect the personal data that we need to ensure the smooth running of the activities, to maintain your health and safety at all times and to ensure you get the best from our activities.

Performance of contract – if we receive funding for an activity we may also collect information specified by the funder. We will only share this information with your permission and only then for funding and monitoring purposes.

Complying with a legal or regulatory obligation - this means processing your personal data where it is necessary for compliance with a legal or regulatory obligation that we are subject to, such as Safeguarding.

What personal information do we collect from the people that visit our website?

When signing up for activities via our booking system we collect name, contact details, relevant medical information and information about behavioural and special educational needs.

The website collects, uses and shares aggregated data such as statistical or demographic data. Aggregated data may be derived from your personal data, but is not considered personal data in law as this data does not directly or indirectly reveal your identity. For example, we may aggregate your usage data to calculate the percentage of users accessing a specific website feature. You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of our website may become inaccessible or not function properly.

Our website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy notice of every website you visit.

Use of Photographs

We will only take and use photographs if you have given us consent to do so, via our booking system or through signing a consent form.. Names are not released with photos. Photos may be used on our facebook page, other media and or funding purposes.

Marketing



We may use your information to contact you about our events and training. We only use your information if you have consented to receive information about Portsmouth Forest School CIC and our activities and events. With our newsletter and events information, we do not share data and you can opt-out at any time.

How do we protect visitor information?

Any data will be stored securely both on paper and computer. Your personal information is contained behind secured networks and is only accessible by a limited number of persons who have special access rights to such systems and are required to keep the information confidential.

Change of purpose

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so. Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

Data Retention

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.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

By law we have to keep basic information about our customers (including Contact, Identity, Financial and Transaction Data) for seven years after they cease being customers for tax purposes.

In some circumstances you can ask us to delete your data: see Your legal rights below for further information.

In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

Third party Disclosure

We do not sell, trade, or otherwise transfer to outside parties your personally identifiable information. No data will be passed to any third parties without your permission.

Your Legal Rights

In relation to data about you, for which we are the data controller, the GDPR requires us to inform you of the rights listed below.

- You have the right to ask us for access to and ratification or erasure of personal data or restriction of processing.



- You have the right to object to processing information on the basis of Legitimate Interest.
- You have the right to data portability for the data that you provided about yourself on the basis of Consent of Contract.
- You have the right to withdraw your Consent at any time, without affecting the lawfulness of earlier processing.
- You have the right to lodge a complaint with the Information Commissioner's Office.

You can find more information about these rights on the website of the Information Commissioner's Office (ICO).

GDPR

We are relying on legitimate interests which means that:

- We are using a targeted and proportionate way of achieving our purpose.
- We take on extra responsibility for ensuring people's rights and interests are fully considered and protected.
- Legitimate interests mean we use data in ways that people would reasonably expect and that have a minimal privacy impact.
- We rely on legitimate interests for marketing activities having a proportionate and minimal privacy impact, would not be likely to surprise or be objected to.

The Information Commissioner's Office (ICO) regulates compliance with data protection legislation and can provide you with independent and impartial advice and guidance.

Queries, Requests or Concerns

For any queries or requests in relation to this Privacy Notice or if you wish to exercise any of the rights set out above, please contact Alison Emery at alison@portsmouthforestschoolcic.co.uk.

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

If this does not resolve your complaint to your satisfaction, you have the right to lodge a complaint with the Information Commissioner's Office on 03031231113 or via email <https://ico.org.uk/global/contact-us/email/> or at the Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF, England, UK.

Read in conjunction with the following policies:

Data Protection and GDPR Policy

Employee Privacy Policy