

Bradley Barton Primary School PTFA Privacy Policy

Introduction

This Privacy Policy explains what to expect when Bradley Barton Primary School Parent, Teacher and Friends Association (PTFA) collects and uses your personal information. The PTFA are committed to protecting your privacy and ensuring that any personal information entrusted to us is processed in accordance with the UK General Data Protection Regulation (UK GDPR).

This Privacy Policy governs our data collections, processing and usage practices. By sharing your personal data with us you consent to the data practices described in this Privacy Policy. If you do not agree with the data practices described in this Privacy Policy, you should not share your data with us.

We use Cookies on our Websites. Insofar as these Cookies are not strictly necessary for the provision of our Websites, we will ask you to consent to our use of Cookies when you first visit our Websites.

Not sharing your data with the PTFA will not impact your rights as a member of the association, although it may impact the PTFA's ability to fulfil its obligations to you.

Our contact details

Name	Bradley Barton Primary School PTFA	
Address	Bradley Barton Primary School, Ogwell Mill	
	Road, Bradley Barton, Newton Abbot. TQ12 1PR	
Phone Number	07525 728 563	
E-mail	ptfa@bradleybarton.com	
Registered Charity Number	1097432	

Interpretations and Definitions

Interpretation

The words of which the initial letter is capitalised have meanings defined under the following conditions. The following definitions shall have the same meaning regardless of whether they appear in singular or in plural.

Definitions

For the purposes of this Privacy Policy:

• **PTFA** (referred to as either "the PTFA", "We", "Us" or "Our" in this Agreement) refers to Bradley Barton Primary School PTFA, Ogwell Mill Rd, Bradley Barton, Newton Abbot TO12 1PR.

- Cookies are small files that are placed on Your computer, mobile device or any other device by a website, containing the details of Your browsing history on that website among its many uses.
- Country refers to: United Kingdom
- **Device** means any device that can access the Service such as a computer, a mobile phone or a digital tablet.
- Personal Information is any information that relates to an identified or identifiable individual.
- **Service(s)** refers to the Website(s).
- Service Provider means any natural or legal person who processes the data on behalf
 of the PTFA. It refers to third-party companies or individuals employed by the PTFA to
 facilitate the Service, to provide the Service on behalf of the PTFA, to perform
 services related to the Service or to assist the PTFA in analyzing how the Service is
 used.
- Usage Data refers to data collected automatically, either generated by the use of the Service or from the Service infrastructure itself (for example, the duration of a page visit).
- Website(s) or Site(s) refers to Recipe Book, accessible from https://sites.google.com/bradleybartonptfa.org/recipebook/home_ or, Events, accessible from https://sites.google.com/bradleybartonptfa.org/events/home, or, MarketPlace, accessible from https://bradleybartonptfashop.co.uk/
- You means the individual accessing or using the Service(s), or the company, or other legal entity on behalf of which such individual is accessing or using the Service(s), as applicable.

Types of Data Collected

Personal Information

The information we collect from you may be classed as personal information, meaning information from which an individual might be identified.

The PTFA collect personal information for a variety of reasons, including:

- To ensure the effective running of the Committee.
- To administer and protect the PTFA, including ensuring compliance with any legal or regulatory obligations that we may be subject to.
- In order to communicate with you (electronically or verbally) regarding any of our events, fundraising activities, meetings, initiatives or any other activity that the PTFA is engaged in.
- To ask members to volunteer to help to run, organise or support any events, fundraising activities, meetings, initiatives or any other activity that the PTFA is engaged in.
- To ask for support including providing raffle prizes, fund matching opportunities, sponsorship, information or any other fund-raising related products or services.
- To process any enquiries placed with us.
- To determine the effectiveness of any events, fundraising activities, meetings, initiatives or any other activity that the PTFA is engaged in.

 To enable the delivery of various services, including the sale of used school uniform, events, raffles, competitions etc.

The PTFA will not collect any personal data from members that it does not need in order to carry out its purposes as set out in the Bradley Barton Primary School PTFA Constitution.

Usage Data

Usage Data is collected automatically when using the Website(s).

Usage Data may include information such as Your Device's Internet Protocol address (e.g. IP address), browser type, browser version, the pages of our Service(s) that You visit, the time and date of Your visit, the time spent on those pages, unique device identifiers and other diagnostic data.

When You access the Service(s) by or through a mobile device, We may collect certain information automatically, including, but not limited to, the type of mobile device You use, Your mobile device unique ID, the IP address of Your mobile device, Your mobile operating system, the type of mobile Internet browser You use, unique device identifiers and other diagnostic data.

We may also collect information that Your browser sends whenever You visit our Service(s) or when You access the Service(s) by or through a mobile device.

Tracking Technologies and Cookies

We use Cookies and similar tracking technologies to track the activity on Our Service(s) and store certain information. All Cookies used by and on Our Site are used in accordance with current English and EU Cookie Law. Before any Cookies are placed on your computer or device you will be shown a pop up requesting your consent to set those Cookies. By giving your consent to the placing of Cookies you are enabling Us to provide the best possible experience and service(s) to you. You may, if you wish, deny consent to the placing of Cookies; however certain features of Our Site may not function fully or as intended. Tracking technologies used are beacons, tags, and scripts to collect and track information and to improve and analyse Our Service(s). Where possible, we will ask you to set a duration for that consent, and allow you to revoke that consent in an easy manner.

The technologies We use may include:

Cookies or Browser Cookies. A cookie is a small file placed on Your Device. You can instruct
Your browser to refuse all Cookies or to indicate when a Cookie is being sent. However, if You
do not accept Cookies, You may not be able to use some parts of our Service. Unless you
have adjusted Your browser setting so that it will refuse Cookies, our Service may use
Cookies.

Cookies can be "Persistent" or "Session" Cookies. Persistent Cookies remain on Your personal computer or mobile device when You go offline, while Session Cookies are deleted as soon as You close Your web browser.

We use both Session and Persistent Cookies for the purposes set out below:

Necessary / Essential Cookies

Type: Session Cookies

Administered by: Google and/or Wordpress

Purpose: These Cookies are essential to provide You with services available through the Website(s) and to enable You to use some of its features. They help to authenticate users

and prevent fraudulent use of user accounts. Without these Cookies, the services that You have asked for cannot be provided, and We only use these Cookies to provide You with those services. We use Google Sites to manage and host some of our Sites, and whilst we have no control over the cookies set by Google, you can find more details of these Cookies in this Google Policy https://policies.google.com/technologies/cookies,

Cookies Policy / Notice Acceptance Cookies

Type: Persistent Cookies

Administered by: Google and/or Wordpress

Purpose: These Cookies identify if users have accepted the use of cookies on the Website. We use Google Sites to manage and host our Sites, and whilst we have no control over the cookies set by Google, you can find more details of these Cookies in this Google Policy https://policies.google.com/technologies/cookies

Analytics Cookies

Type: Persistent Cookies

Administered by: Google and/or Wordpress

Purpose: These Cookies identify if users have accepted the use of cookies on the Website.

For full details of these Cookies please see the Google Policy here

https://policies.google.com/technologies/cookies

Our Site(s) uses analytics services provided by Google Analytics. Website analytics refers to a set of tools used to collect and analyse usage statistics, enabling Us to better understand how people use Our Site. This, in turn, enables Us to improve Our Site(s) and the services offered through it. You do not have to allow Us to use these Cookies, as detailed below, however whilst Our use of them does not pose any risk to your privacy or your safe use of Our Site, it does enable Us to continually improve Our Site, making it a better and more useful experience for you.

There are various options available to opt-out of Google Analytics, including the <u>Google Analytics</u> <u>Opt-out Browser Add-on</u>.

• The analytics service(s) used by Our Site use(s) the following Cookies:

PHPSESSID	Google Analytics	To identify your unique session on the website.
SESS	Google Analytics	To ensure that you are recognised when you move from page to page within the site and that any information you have entered is remembered

utma	Google Analytics	This cookie keeps track of the number of times a visitor has been to the site pertaining to the cookie, when their first visit was, and when their last visit occurred. Google Analytics uses the information from this cookie to calculate things like Days and Visits to purchase.
utmb	Google Analytics	utmb is a Google Analytics cookie. It takes a timestamp of the exact moment in time when a visitor enters a site.
utmc	Google Analytics	utmc takes a timestamp of the exact moment in time when a visitor leaves a site.
utmz	Google Analytics	Keeps track of where the visitor came from, what search engine you used, what link you clicked on, what keyword you used, and where they were in the world when you accessed a website. This cookie is how Google Analytics knows to whom and to what source / medium / keyword to assign the credit for a Goal Conversion or an Ecommerce Transaction.
ga_disable	Google Analytics	Placed if you opt out of Google Analytics from this Privacy Policy
ga	Google Analytics	Stores anonymised statistics

tk_lr	Jetpack	This cookie is set by the JetPack plugin on sites using WooCommerce. This is a referral cookie used for analysing referrer behaviour for Jetpack.
tk_or	Jetpack	This cookie is set by the JetPack plugin on sites using WooCommerce. This is a referral cookie used for analysing referrer behaviour for Jetpack.
tk_r3d	Jetpack	The cookie is installed by JetPack. Used for the internal metrics for user activities to improve user experience.

Our Marketplace uses ecommerce technology from Woocommerce, which requires certain cookies to function. There are:

Cookie Name	Duration	Purpose
woocommerce_cart_hash	session	Helps WooCommerce determine when cart contents/data changes.
woocommerce_items_in_cart	session	Helps WooCommerce determine when cart contents/data changes.
wp_woocommerce_session_	2 days	Contains a unique code for each customer so that it knows where to find the cart data in the database for each customer.
woocommerce_recently_view ed	session	Powers the Recent Viewed Products widget
store_notice{notice id]	session	Allows customers to dismiss the Store Notice

You can choose to enable or disable Cookies in your internet browser. Most internet browsers also enable you to choose whether you wish to disable all cookies or only third party cookies. By default, most internet browsers accept Cookies but this can be changed. For further details, please consult the help menu in your internet browser or the documentation that came with your device.

You can choose to delete Cookies at any time however you may lose any information that enables you to access Our Site more quickly and efficiently including, but not limited to, login and personalisation settings.

It is recommended that you keep your internet browser and operating system up-to-date and that you consult the help and guidance provided by the developer of your internet browser and manufacturer of your computer or device if you are unsure about adjusting your privacy settings.

How we use your personal information

We will ask you to confirm that you are happy to receive communications from the PTFA, and for the PTFA to hold certain personal information in order to carry out its purposes and operations as part of our annual Parents Questionnaire and occasionally at other times. This confirmation is your consent that you are happy for the PTFA to communicate with you about all PTFA events, or to contact you regarding specific events, fundraising activities, meetings, initiatives or any other activity that the PFTA is engaged in.

The PTFA Parents Questionnaire will ask you to provide or confirm your personal data at the beginning of each school year. Whilst all parents are members of the PTFA, and we are legally required to maintain a register of our members, this information is requested on the lawful basis of consent. Not sharing your data with the PTFA will not impact on your rights as a member of the association, although it may impact the PTFA's ability to fulfil its obligations to you.

If you connect with the PTFA via social media (e.g. Facebook, Instagram or Twitter by 'liking' or 'following' us) or communication application (e.g. WhatsApp, ClassList, Doodle Poll) we may collect information and data such as your name and details you provide to us through that social media outlet or communication application. Our Privacy Policy applies to all social media activity.

If you contact the PFTA, we may keep a record of your email and other correspondence in accordance with the guidelines set out in <u>How we store your personal information</u>.

If you have donated any type of service, raffle or auction prize to the PTFA we may keep a record of your name, contact details and donated item or service in accordance with the guidelines set out in How we store your personal information. We may use your children's names, photographs of your children, and/or your children's artwork on items related to PTFA fundraisers including, but not limited to, leavers clothes, leavers yearbook, programmes, calendars, tea towels, Christmas cards etc. Participation in such events confirms your consent.

We may have a record of your bank account details if you were to provide your bank account details in connection with submitting an expense that is to be reimbursed by electronic transfer from the PTFA bank account to your named bank account. Occasionally, and with an individual's specific consent, we may request information such as your date of birth, National Insurance number, maiden

name and place of birth in order to comply with relevant legislation (e.g. applying for a Temporary Event Notice on your behalf). We will share this personal data with the appropriate third party (i.e. DCC or TDC and the local police) and will only store such data for such a time we are legally obliged to by the relevant authority. We will never share your personal data with third party companies outside of the PTFA for marketing purposes.

We may share some of your personal data with a third party in the following circumstances:

- solely for the purposes of fulfilling an order you place through the PTFA (e.g. leavers clothes, leavers yearbook, programmes, calendars, tea towels, Christmas cards etc)
- with our third-party service providers, agents, subcontractors and other associated organisations for the purposes of completing tasks and providing services to you on our behalf (e.g. to process payments (i.e. PayPal, etc.), for e-mail access (e.g. MailChimp, ClassList, Doodle Poll, Paperless Post, EventBrite, etc. to send you PTFA communications, for the purposes of putting on events, fundraising activities, meetings, initiatives or any other activity that the PTFA is engaged in). Some of these entities may be based outside the UK, and subject to different privacy regimes. You should ensure that you are happy with their own data protection and privacy policies, which can be viewed on their websites, before sharing data with them.

We may also take photos and videos during PTFA events. Data subjects will be made clear that this is happening and asked for consent for such images to be published on the PTFA noticeboard, newletter, website or social media.

The type of personal information we collect

We currently collect and process the following information:

Type of Information	Purpose	Lawful Basis	Legitimate Interest	Retention	Access	Storage
Committee member contact details – name, telephone, email	Effective running of the committee	Legal Obligation	Yes	Reviewed at each AGM	Committee Members	Cloud storage, encrypted, restricted access
Members Database – name, telephone, email, contact preferences, expected membership end date, relevant skills, relevant interests, how members would like to be involved.	Enable effective communications and volunteer engagement. Enable effective operations of the PTFA and its activities	Legal Obligation, Consent	Yes	Members opt into the Members Database and can opt out at any time by contacting the PTFA. The list will be reviewed annually using expected membership end date	Secretary	Cloud storage, encrypted, restricted access
Contact details on activity and fundraising forms e.g., raffle tickets	To administer said activities or fundraising initiatives and contact winners	Contract	Yes	Details will be destroyed after three months of the activity or initiative completing	Nominated Lead and Committee for the event	Paper copies or Cloud storage, encrypted, restricted access
Details of monetary donations – name, amount, home address	To enable administration of the donation in line with our legal obligations, and	Legal Obligation	Yes	As legally required	Treasurer	Cloud storage, encrypted, restricted access

to claim gift aid		
where relevant		

How we store your personal information

We will ensure all data that you give us is kept securely and restricted to those set out in the above table or those with a 'need to know' for specific events, fundraising activities, meetings, initiatives or any other activity that the PFTA is engaged in.

We are committed to protecting information about you and your children. Data supplied to or held by the PTFA will be stored securely in a password protected online secure file sharing system, which is compliant with UK GDPR.

Where committee members have access to personal data such as an email address or telephone number, 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.

The PTFA 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 data protection rights

Under data protection law, you have rights including:

Your right of access - You have the right to ask us for copies of your personal information.

Your right to rectification - You have the right to ask us to rectify personal information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete.

Your right to erasure - You have the right to ask us to erase your personal information in certain circumstances.

Your right to restriction of processing - You have the right to ask us to restrict the processing of your personal information in certain circumstances.

Your right to object to processing - You have the right to object to the processing of your personal information in certain circumstances.

Your right to data portability - You have the right to ask that we transfer the personal information you gave us to another organisation, or to you, in certain circumstances.

You are not required to pay any charge for exercising your rights. If you make a request, we have one month to respond to you.

Please contact us at ptfa@bradleybarton.com if you wish to make a request.

More information

Please contact us on ptfa@bradleybarton.com if you have any questions about this Privacy Policy or the information we hold about you. The PTFA will update this Notice from time to time, and any

substantial changes that affect how we use your personal data will be notified Bradley Barton Primary School Website PTFA page and to you directly as far as is possible.

You can also read more about GDPR on the Information Commissioner's Office (ICO) website https://ico.org.uk.

How to complain

If you have any concerns about our use of your personal information, you can make a complaint to us at ptfa@bradleybarton.com

You can also complain to the ICO if you are unhappy with how we have used your data.

The ICO's address:

Information Commissioner's Office Wycliffe House Water Lane Wilmslow Cheshire SK9 5AF

Helpline number: 0303 123 1113

ICO website: https://www.ico.org.uk

Adopted	11/10/2021
Reviewed	31/03/2022
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Review Cycle	Annual