



PRIVACY AND DATA PROTECTION POLICY (UK GDPR POLICY)

Polish School in Rugby CIC

1. General Information

The Data Controller of your personal data is **Polish School in Rugby CIC**, with its registered office in Rugby, registered in the UK commercial register at Companies House under company number: **16119759**.

The School processes all personal data in a secure, fair, and confidential manner, in strict compliance with the **UK GDPR** and the **Data Protection Act 2018**.

Any questions, requests, or inquiries regarding personal data protection should be directed directly to the School's Board of Directors at the official email address: **SPSchool555@gmail.com**.

2. Scope and Purpose of Personal Data Collection

The School collects and processes only the personal data that is objectively necessary for the safe, legal, and efficient operation of the weekend educational institution:

- **Students' Data:** first name, surname, date of birth, level of Polish language proficiency, medical information (including allergies, possession of an EpiPen/inhaler), Special Educational Needs (SEN), attendance records, and behaviour history (internal traffic lights system and motivational points within the school application).
- **Parents' and Legal Guardians' Data:** first name, surname, residential address (verified for the school's insurance purposes), mobile phone number, email address, data necessary for tuition fee billing, and contact numbers for designated emergency contacts.
- **Staff and Volunteers' Data:** first name, surname, residential address, contact details, teaching qualifications, bank details required for salary payments, and the number, date, and status of the British criminal record certificate (Enhanced DBS check).

3. Legal Basis for Data Processing

The processing of personal data at the School is based on the following legal foundations provided under UK law:

- **Consent:** Applied during the core recruitment process and when obtaining permission to publish a child's image (photos, videos).
- **Contract:** Necessary for the provision of educational services, conducting classes, and collecting and settling tuition fees.

- **Legitimate Interest:** Applies to ongoing communication with parents, sending school announcements, and ensuring safety on the premises of Houlton School.
- **Legal Obligation & Vital Interests:** Absolute compliance related to child protection procedures (Safeguarding) and the immediate saving of health and life in the event of accidents or medical emergencies.

4. Data Sharing, Entrustment, and Retention

- **Confidentiality and Sharing:** Personal data is strictly confidential. It may be shared with external parties only to the minimum extent necessary: to class teachers (attendance sheets and medical information only), to UK government agencies (HMRC, Companies House, CIC Regulator for financial reporting purposes), or to UK emergency services and social care (MASH, Police) in crisis situations (Safeguarding).
- **Third-Party Service Providers (Digital Platforms):** The School entrusts the processing of digital data (such as children's names and point scores) to an external, secure educational platform, ClassDojo, which operates in full compliance with European and UK data protection standards.
- **Data Retention Period:** Personal data is not transferred outside the United Kingdom. It is stored for periods strictly regulated by UK education law and insurance requirements:
 - Financial and tax documentation – for a period of 6 years.
 - Student's core enrolment data – for the duration of the child's attendance at the School.
 - Accident registers and attendance lists – for the period required by the UK insurer in the event of potential claims.
 - Child protection documentation (Safeguarding) – in accordance with the guidelines of the local child protection authority in Warwickshire.

5. Rights of Data Subjects

Every parent, employee, and volunteer has the full right to control their data, including the right to:

- Access their data and receive a copy of it.
- Rectify or update incorrect information.
- Erase data ("the right to be forgotten") – provided that its retention is not required by a UK statutory obligation (e.g., Health and Safety or Safeguarding regulations).
- Restrict processing or object to processing.

- Withdraw previously given consent (e.g., consent to publish a child's image on social media) at any time, without affecting the lawfulness of processing based on consent before its withdrawal.

If you believe that your data is being processed unlawfully, you have the full right to lodge an official complaint with the UK data protection authority: the **Information Commissioner's Office (ICO)**.

Effective Date: 05.09.2026

Signatures of the CIC Directors: Ewa Okręglicka, Katarzyna Wilczyńska