



## PRIVACY NOTICE FOR ONLINE PAYMENTS

Attain Academy Partnership (herein referred to as the 'Trust') is the Data Controller for the purpose of data protection law. The 'Trust' comprises of Bocking Primary School, Cressing Primary School, de Vere Primary School, Elm Hall Primary School, Gosfield Community Primary School, Newlands Spring Primary & Nursery School and Rayne Primary & Nursery School (herein referred to as the 'Academy').

This privacy notice has been written to inform parents and guardians of pupils at Attain Academy Partnership, about how we collect, store and use personal data in relation to online payments.

### 1. Introduction

Under data protection law, individuals have a right to be informed about their personal data is processed. We comply with this right by providing privacy notices to individuals where we are processing their personal data.

Attain Academy Partnership, is the 'data controller' for the purposes of data protection law. This privacy notice explains how we collect, store and use personal data about individuals in relation to online payments. We take the security of your data seriously. We have internal policies and controls in place to ensure that your data is not lost, accidentally destroyed, misused or disclosed and is not accessed except by its employees and service providers in the performance of their duties. Please see below for details of our Data Protection Officer.

The headteacher / head of school in each Academy is responsible for ensuring that their Academy complies with Trust's policies and procedures in relation to Data Protection. This policy has been written with consideration given to working practices. By adopting this policy, a reduction in workload has been facilitated by reducing the need for individual academies to interpret the policy locally.

### 2. The categories of personal information that we collect, hold and share

Personal data that we may collect, use, store and share (when appropriate) about you includes, but is not restricted to:

- Parent / guardians names and contact details
- Pupils name
- Pupil identifiers – class, year group, UPN
- Dietary needs (where relevant)
- Medical needs (where relevant)

### 3. Why we collect and use personal information

We use limited personal data about pupils and parents/ guardians with online payment providers to manage payments to the school.

### 4. The lawful basis on which we use this information

We collect and use personal information about you under the following legal bases:

- Public interest: Specifically, the processing is necessary for the processing of a task carried out in the public interest or in the exercise of official authority vested in the controller



## 5. Collecting personal information

The majority of personal information is collected from parents / guardians when their child joins the Academy.

## 6. Storing personal data

The information is kept secure and is only used for purposes directly relevant to the process for which it was collected. We have put in place appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed.

Personal data is stored in line with the Data Protection Policy. We do not store personal data indefinitely; personal data is kept for as long as necessary to fulfil the purposes for which it was collected for, including for the purposes of satisfying any legal, accounting, insurance or reporting requirements.

Details of retention periods for the different categories of personal data are available in our Data Retention Policy on the Academy website.

## 7. Who we share personal information with

Your information will be shared with our online provider who works for us under contract. The Trust is the data controller and the online payment provider is the data processor.

In the event that we share personal data with third parties, we will provide the minimum amount necessary to fulfil the purpose for which we are required to share the data. We do not sell personal data to any organisation for the purposes of selling products.

Online payment providers used within the Trust include:

Pay 360 by Capita (Capita ESS: [Privacy notice](#))

School Ping (New Era: [Privacy Notice](#))

A full and up to date list of Third Party providers for each Academy can be found at any time on the Academy's website

## 8. Transfer of personal information outside of the EU

We do not share or store data in countries with no UK-equivalent privacy law protections. If we were to receive a request to send information outside of the UK, additional protection will be applied to the data and where the recipient country is not seen as 'safe' by the UK government, advice will be sought from the Information Commissioners Office prior to the data being sent.

## 9. Requesting access to your personal data

Individuals have the following rights under data protection legislation in relation to the processing of their data. You have the right to:

- Be informed about how the Trust and / or the Academy uses your personal data. This notice fulfils that obligation
- Access the personal data the Trust and / or the Academy holds about them. When we receive a request in writing, we must normally give you access to everything we have recorded about you. However, we will not let you see any parts of your record which contains:
  - Confidential information about other people
  - Data that an information professional thinks will cause serious harm to your or someone else's physical or mental wellbeing

- Data that may adversely affect the prevention or detection of crime if it were disclosed to you
- Change information you believe to be inaccurate. We may not always be able to change or remove information you disagree with however we will correct factual inaccuracies and may include your comments in the records
- Be forgotten. In certain circumstances you can request the erasure of personal information used by the Trust however this does not extend to using your personal data where:
  - It is required by law
  - It is in the public interest in the area of public health
  - It is necessary for the establishment, defence or exercise of legal claims.

Where personal information has been shared with others, we will make every reasonable effort to ensure those using your personal data comply with your request for erasure.

- Restrict what your information is used for. You may restrict its use when one of the following apply:
  - You have identified inaccurate information, and have notified us of this
  - Where using the information is unlawful and you wish to restrict rather than erase the information
  - Where you have objected to us using the information, and the legal reason for us using your information has not yet been provided to you.

When information is restricted it cannot be used other than to securely store the data, and with your consent, to handle legal claims, protect others or where it is important public interests of the UK

You have the right to request that the Trust/Academy stop using your personal data for some services. However, if this request is approved it may cause delays or prevent us delivering a service to you. Where possible we will seek to comply with your request, but we may need to hold or use information in connection with one of more of our legal functions.

You have the right to prevent processing for the purpose of direct marketing.

If you would like to exercise these rights, contact the Data Protection Officer (See Contact details below).

These rights are further explained in our Data Protection Policy available in the Data Protection section on our website. Anyone wishing to exercise these rights may do so by contacting the academy office or our Data Protection Officer. **Please see the ‘Contacts’ section below.**

## 10. Complaints

We take any complaints about our collection and use of personal information very seriously. If you think that our collection or use of personal information is unfair, misleading or inappropriate, or have any other concern about our data processing, please raise this with the academy in the first instance.

If you would like to make a complaint, please contact our Data Protection Officer (See Contact details below).

If you still have concerns following our response you have the right to raise the matter directly with the Information Commissioner’s Office:

<b>Online</b>	<a href="https://ico.org.uk/concerns/">https://ico.org.uk/concerns/</a>
<b>Postal Address</b>	Information Commissioner's Office, Wycliffe House, Water Lane,



	Wilmslow, Cheshire, SK9 5AF
<b>Email</b>	<a href="https://ico.org.uk/concerns/handling/">https://ico.org.uk/concerns/handling/</a>
<b>Phone Number</b>	0303 123 1113

## 11. Contact

If you would like to discuss anything in this privacy notice or make a Subject Access Request, please contact the Data Protection officer

<b>Data Protection Officer</b>	Mrs Ellwood
<b>Postal Address</b>	Attain Academy Partnership, c/o Newlands Spring Primary and Nursery School, Dickens Place, Chelmsford CM1 4UU
<b>Email</b>	<a href="mailto:DPO@attain.essex.sch.uk">DPO@attain.essex.sch.uk</a>

Please ensure you include the name of the School in all correspondence with the DPO

## 12. Last updated

We may need to update the privacy notice periodically so we recommend that you revisit this information from time to time. This version was last updated on **6 April 2022**