



# CORNWALL ASSOCIATION OF PRIMARY HEADTEACHERS (CAPH)



## FAIR PROCESSING NOTICE

### Who we are

We are a Community Interest Company owned by schools in Cornwall. Our purpose is to be a vehicle for improvement and innovation for education in Cornwall, through supporting school leaders and staff. CAPH membership is open to all school in Cornwall, whatever their status – academy, maintained, trust...

Registered Company Number: 8865830

Registered Address: Beacon Place, Victoria, Roche, PL26 8LG

ICO Registration Number: ZA195920

This Notice relates to our use of any personal data we collect as a Data Controller. We act as a Data Processor for Supply+, and there is a separate [Notice](#) setting out required information as part of that agreement.

### Why we collect data

We collect personal data to fulfil contractual obligations, statutory obligations and for legitimate interests.

Collecting personal data allows us:

- To provide services to you (or your School) as a member of Cornwall Association of Primary Heads, as set out in our Membership Agreement;
- To provide you with information, products or services that you request from us or which we feel may interest you, where you have consented to be contacted for such purposes or by legitimate interests;
- To enable us to invoice you for services provided;
- To enable us to pay you for services provided;
- To enable us to comply with statutory requirements set out by Companies House (for Company Directors)

### Legitimate Interest

We may process your data for the purposes of our own legitimate interests provided that those interests do not override any of your own interests, rights and freedoms which require the protection of personal data. We will never sell your data to a third party for marketing purposes.

Our legitimate interests are:

- Maintaining a relationship with you if you are a partner organisation, associate, school, funder or stakeholder;

- Ensuring you are aware of our events and activities, and staff at member schools are aware of all services available within the Membership Agreement;

### **What data do we collect**

We may collect the following types of personal data:

- Contact details;
- Date of birth;
- Bank details;
- Dietary requirements.
  
- Information required for Company Directors, such as:
  - Nationality;
  - Eye Colour;
  - National insurance numbers;
  - Maiden name.
  
- Information required for employment purposes, such as:
  - national insurance numbers;
  - remuneration details;
  - qualifications.

Our website provider is eSchools, there is further information on our website about how the site tracks users through Cookies, and how to disable these.

We use Google Analytics to analyse usage of our website, information on this can be found at <https://support.google.com/analytics/answer/6004245?hl=en-GB>. We do not use this information to identify individual users but to enable us to assess which content is most useful to members as a whole.

We use Bitlinks, provided by Bitly, to track readership of our weekly Bulletin. This is used to analyse the number of clicks on individual news items, not to identify individual users.

### **How long we will keep the information**

We will only retain personal data for as long as is necessary to achieve the purposes for which they were originally collected. Please contact us for more information if required.

### **Who we will share the information with**

Personal data will be accessible by members of staff. Where necessary the CAPH Strategic Leadership Consultant and members of the CAPH Board of Directors will also have access.

We will not share information with third parties without consent unless we are required to do so by law or our policies. We do not share information with any third parties for marketing purposes.

Personal data will be processed in various ways, including:

- sending via email;
- adding to spreadsheets, word documents or similar for the purposes of assessing personal data;

- using accounting software (Sage) for invoicing, payments and payroll;
- using online banking software (Cooperative Bank) to enable electronic payments;
- sharing with software providers to enable membership services (eSchools);
- sharing delegate dietary requirements with event venues;
- sharing delegate information with our conference partner (Imattination).

We do not transfer your data outside of the European Economic Area.

### **Personal data protection rights**

The General Data Protection Regulation and associated law gives you rights in relation to personal data held about you

- Obtain, free of charge, a copy of all personal information that we hold;
- Have any inaccuracies or incompleteness in the information rectified;
- Object to us processing any personal information;
- Restrict the ways in which we process any personal information;
- Have us erase any personal information; and
- Withdraw consent to process the data in circumstances where consent has been obtained.

### **How to contact us**

If you have any questions or concerns about how we process any personal information, or wish to exercise any of your data protection rights, you can contact Michelle Renowden, Office Manager at [michelle@caph.org.uk](mailto:michelle@caph.org.uk).

If you are not satisfied with the response, you are able to contact the Information Commissioners Office <https://ico.org.uk/>.

This Notice was last updated on 23<sup>rd</sup> May 2018.