



## Privacy Notice – Lettings Customers

In order to administer our school lettings we hold a small amount of personal data on our customers. This document aims to describe this data, explain what we do with it, and outline your data protection rights.

We promise to ensure that this personal information is processed fairly, is correct, is stored safely, and is kept for no longer than needed.

### Who should I contact about data protection issues?

We have chosen a member of staff, Mr. Alex Melmoe, to have responsibility for data security – he is our Data Protection Officer. One of our Governors, Mrs. Celia Wilson, oversees Alex and make sure he's doing the job properly. If you want to talk about your personal information, they can be contacted via e-mail at [dataprotection@imberhorne.co.uk](mailto:dataprotection@imberhorne.co.uk) or via the school switchboard on 01342 323562.

### The Lettings Customer information we collect, hold and share

We collect and store the following information on our lettings customers

- **Name**
- **Address & Contact Details**
- **Lettings Details**  
*(Details of areas hired, when they were hired, how long they were hired for)*

### Retention of data

We keep Lettings information for 6 years after our financial year in which the letting was made. Once we reach the time to dispose of the data electronic data is deleted and any paper records are shredded using a company that performs shredding on-site, this is performed at the end of our financial year each April.

### Our legal basis for processing personal data

The current data protection laws require us to have a “legal basis” for processing personal data. We store information on our lettings customers to enable us to fulfil the lettings contract.

### Who we share Lettings Customer information with

We may share lettings customer information with:

- West Sussex County Council (the local authority)
- Our Cleaning Contractor

We don't share information about our lettings customers without consent unless the law and our policies allow us to do so. Full details of who we share data with and why can be found at the back of this document.

### Your rights

Under the current GDPR data protection regulations, we have to inform you that you have the following rights. Should you wish to exercise any of these rights please contact our Data Protection Officer – details on the first page of this document.

- **The right of access**  
*Being able to get a copy of the data we hold. You can contact us to request a copy of the data we hold – called a "Subject Access Request". We have to get back to you as soon possible as we can't take longer than a month to provide the data.*
- **The right to rectification**  
*Being able to ask us to fix mistakes.*
- **The right to erasure**  
*Have information we hold deleted.*
- **The right to restrict processing**  
*Which means we can still hold the data, but can't use it.*
- **The right to object**  
*Where we process data on the grounds of consent you are free to withdraw that consent at any time. You also have the right to object to processing of personal data that is likely to cause, or is causing, damage or distress*

Note that there are circumstances when the above rights don't apply, like when a law says we need to hold certain pieces of information, or if not processing the data places a student in danger.

### Data Protection Complaints

If you are unhappy with the way your request has been handled, you may wish to ask for a review of our decision by contacting our Data Protection Officer.

If you are not content with the outcome of the internal review, you may apply directly to the Information Commissioner (the Government Body responsible for data protection) for a decision. Generally, the Information Commissioner cannot make a decision unless you have exhausted our internal review procedure.

You can log a complaint with the Information Commissioner online at <https://ico.org.uk/concerns/>



## **Who we share lettings customer information with and why**

### **Local Authority**

We share lettings information with West Sussex County Council (our Local Authority) if you require us to provide Insurance for your letting, as the insurance is provided by West Sussex County Council. This allows us to fulfil our contractual obligations to you.

### **Our Cleaning Contractor**

We outsource our cleaning to a private company. On occasion they may be responsible for opening or locking the school and may need to contact you regarding your letting. They won't use your details for any other purpose, and they share our data protection standards. This sharing is part of us fulfilling our contract to you.

## **Summary of Changes to this Document**

From time to time we make small changes to this document to ensure it continues to describe how we process your data accurately. The table below summarises changes we have made.

<b>Date</b>	<b>Author</b>	<b>Changes</b>
04/06/18	AJM	Changed Data Protection Governor due to resignation of previous post holder.