

FLAGFINDERS CTB LIMITED

Privacy Information Notice for School Contract Customers

What is the purpose of this document?

The Company, Flagfinders CTB Ltd is a "data controller". This means that we are responsible for deciding how we hold and use personal information about you and your child. We are required under data protection legislation to notify you of the information contained in this privacy notice. This privacy notice describes how we collect and use personal information about you and your child when you purchase products and services from us.

This notice applies to current and former customers as well as prospective customers. This notice does not form part of any contract with you and we may update this notice at any time.

It is important that you read this notice, together with any other privacy notice we may provide on specific occasions when we are collecting or processing personal information about you or your child, so that you are aware of how and why we are using such information.

In this notice "The Company, Flagfinders", "we", "us" and "our" means Flagfinders CTB Ltd.

Data protection principles

We will comply with data protection law. This says that the personal information we hold about you must be:

1. Used lawfully, fairly and in a transparent way.
2. Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes.
3. Relevant to the purposes we have told you about and limited only to those purposes.
4. Accurate and kept up to date.
5. Kept only as long as necessary for the purposes we have told you about.
6. Kept securely.

The kind of information we hold about you

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

There are "special categories" of more sensitive personal data which require a higher level of protection.

We may collect, store, and use the following categories of personal information about you and your child:

- Personal contact details such as name, title, addresses, telephone numbers, and personal email addresses.
- Gender
- Bank account details.
- CCTV footage and other information obtained through electronic means such as swipecard records.
- Details of School/college attending

We do not collect any Special Categories of data about you or your child.

How is your personal information collected?

We typically collect personal information about you or your child directly from you. We may sometimes collect additional information from third parties including your child's school or Essex County Council.

How we will use information about you

We will only use your personal information when the law allows us to. Most commonly, we will use your personal information in the following circumstances:

1. Where we need to perform the contract we have entered into with you.
2. Where we need to comply with a legal obligation.
3. Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.

We may also use your personal information in the following situations, which are likely to be rare:

1. Where we need to protect your interests (or someone else's interests).
2. Where it is needed in the public interest.

Situations in which we will use your personal information

We will need to use the categories of information set out in the list above (under the heading 'The kind of information we hold about you') in certain circumstances. The situations in which we will process personal information about you or your child are listed below.

We have identified by the use of asterisks on the list below, the lawful basis on which we rely when we are processing or will process personal information about you or your child. We have also indicated which categories of data are involved.

Where we need the information primarily to allow us to perform our contract with you, this is indicated by *.

Where we need the information to enable us to comply with legal obligations, this is indicated by **.

In some cases we may use your personal information to pursue legitimate interests of our own or those of third parties, provided your interests and fundamental rights do not override those interests. This is indicated by ***.

Recording your interest in our products or services. ***

Determining the terms of sale. *

Taking payment from you. *

Administering the contract we have entered into with you. *

Liaising with you after the sale of our services in relation to any issues or problems. *

Dealing with any disputes concerning our services. *

Some of the above grounds for processing will overlap and there may be several grounds which justify our use of personal information relating to you or your child.

If you fail to provide personal information

If you fail to provide certain information when requested, we may not be able to perform the contract we have entered into with you, or we may be prevented from complying with our legal obligations.

Change of purpose

We will only use personal information about you or your child for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If we need to use personal information about you or your child for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process personal information about you or your child without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

Data sharing

Why might you share my personal information with third parties?

We may share personal information about you or your child with third parties where required by law, where it is necessary to administer our contract with you or where we have another legitimate interest in doing so.

Which third-party service providers process my personal information?

"Third parties" includes third-party service providers (including contractors). We do not usually provide personal data about you or your child to third parties.

How secure is my information with third-party service providers?

All our third-party service providers are required to take appropriate security measures to protect your personal information in line with our policies. We do not allow our third-party service providers to use personal data about you or your child for their own purposes. We only permit them to process personal data for specified purposes and in accordance with our instructions.

What about other third parties?

We may share personal information about you or your child with other third parties, for example their school or college or Essex County Council, Passenger Transport .

Data security

We have put in place appropriate security measures to prevent personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. Details of these measures are available on request. In addition, we limit access to personal information to those employees, agents, contractors and other third parties who have a business need to know. They will only process personal information on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

Data retention

How long will you use my information for?

We will only retain your personal information for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements. Once this no longer applies we will securely destroy your personal information in accordance with our data retention policy. Please contact us if you would like further information about this.

Rights of access, correction, erasure, and restriction

Your duty to inform us of changes

It is important that the personal information we hold about you and your child is accurate and current. Please keep us informed if your personal information changes during your relationship with us.

Your rights in connection with personal information

Under certain circumstances, by law you have the right to:

Request access to your personal information (commonly known as a "data subject access request"). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.

Request correction of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.

Request erasure of your personal information. This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing (see below).

Object to processing of your personal information where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground. You also have the right to object where we are processing your personal information for direct marketing purposes.

Request the restriction of processing of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.

Request the transfer of your personal information to another party.

If you want to review, verify, correct or request erasure of your personal information, object to the processing of your personal data, or request that we transfer a copy of your personal information to another party, please contact [POSITION] in writing.

No fee usually required

You will not have to pay a fee to access your personal information (or to exercise any of the other rights). However, we may charge a reasonable fee if your request for access is clearly unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances.

What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access the information (or to exercise any of your other rights). This is another appropriate security measure to ensure that personal information is not disclosed to any person who has no right to receive it.

Right to withdraw consent

In the limited circumstances where you may have provided your consent to the collection, processing and transfer of your personal information for a specific purpose, you have the right to withdraw your consent for that specific processing at any time. To withdraw your consent, please contact [POSITION]. Once we have received notification

that you have withdrawn your consent, we will no longer process your information for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law.

Compliance contact

We have appointed a Data Protection Manager to oversee compliance with this privacy notice. If you have any questions about this privacy notice or how we handle personal information about you or your child then please contact the Data Protection Manager. You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues.

If you have any questions about this privacy notice, please contact the Data Protection Manager on 01376320501.