

**DOLLAR ACADEMY** a registered charity registered in Scotland with SC009888 and whose registered office is at 23 West Burnside, Dollar, FK14 7DZ (the “**School**”) is a "data controller". This means that we are responsible for deciding how we hold and use personal information about you. This privacy notice is relevant to you if you are applying for a place with us, or you are applying for a place for your child. It makes you aware of how and why your personal data will be used, namely for the purposes of the recruitment exercise, and how long it will usually be retained for. It provides you with certain information that must be provided under the General Data Protection Regulation ((EU) 2016/679) (GDPR).

### **Data protection principles**

We will comply with data protection law and principles, which means that your data will be:

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

### **The kind of information we hold about you**

In connection with your application for a place, we will collect, store, and use the following categories of personal information about you:

- For parents or guardians: the information you have provided on our admissions form, including names, titles, relationship to child, addresses, telephone numbers, email addresses, nationality, (and for Tier 4 visa applicants, their passport details).
- For prospective pupils: date of birth, gender, education history, nationality, birth certificate (and for boarders, the photograph page of their passport).
- For both parents/guardians and prospective pupils, any information you provide to us during an interview.

We may also collect, store and use the following "special categories" of more sensitive personal information:

- Information about race, ethnicity, religious beliefs or occupation.
- Information about health, including any medical condition, health and sickness records.
- Information about any special educational needs.

### **How is your personal information collected?**

We collect personal information about prospective pupils from the following sources:

- You, the prospective pupil.

- You, the parents or guardians (or agent) of the prospective pupil
- The pupil's current School, if applicable, from whom we collect the following categories of data: educational attainment; any conduct or other relevant behavioural issues with your current school.

### **How we will use the information about you**

We will use the personal information we collect to:

- Assess the prospective pupil's suitability for attendance at the School.
- Communicate with the parents or guardians (or agent) about the admissions process.
- Communicate with the parents or guardians (or agent) about the school.
- Keep records related to our admissions processes.
- Comply with legal or regulatory requirements.

This is because it is in our legitimate interests to decide whether to admit the prospective pupil, since it would be beneficial to the school to admit appropriate applicants. We also need to process personal information to decide whether to enter into a parental contracts.

Having received your application for enrolment form, we will then process the information to help to decide whether you meet the requirements to be considered for admission to the School. Depending on the age of the child, we may take the results of entrance assessments and interviews into account. We may also base decisions on information regarding educational attainment and conduct or other relevant behavioural issues at current or previous schools.

### **If you fail to provide personal information**

If you fail to provide information that is necessary for us to consider your application (such as evidence of educational attainment), we may not be able to process your application.

### **How we use particularly sensitive personal information**

We will use your particularly sensitive personal information in the following ways:

- We will use information about your disability status to consider whether we need to provide appropriate adjustments during the admissions process.
- We will use information about race, ethnicity, religious beliefs and occupation, to ensure meaningful equal opportunity monitoring and reporting.

### **Automated decision-making**

You will not be subject to decisions that will have a significant impact on you based solely on automated decision-making.

### **Data security**

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. In addition, we limit access to your personal information to those employees who have a business need to know. They will only process your 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. If you have any concerns about the personal data of you or your child, please contact the Data Protection Officer at [dataprotection@dollaracademy.org.uk](mailto:dataprotection@dollaracademy.org.uk).

## **Data retention**

### **How long will you use my information for?**

If a place is not offered, we may keep the personal information supplied for a period of up to twelve months. We retain your personal information for that period so that we can show, in the event of a legal claim, that we have not discriminated against applicants on prohibited grounds and that we have conducted the admissions exercise in a fair and transparent way. After this period, we will securely destroy your personal information in accordance with our data retention policy.

If we wish to retain your personal information on file, for example if we cannot currently offer a place but one might become available in the future, we will write to you separately, seeking your explicit consent to retain your personal information for a fixed period on that basis.

## **Rights of access, correction, erasure, and restriction**

### **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 the Registrar in writing.

## **Right to withdraw consent**

When you completed the application for enrolment form, you provided consent to us processing your personal information for the purposes of the admissions exercise. You have the right to withdraw your consent for processing for that purpose at any time. To withdraw your consent, please contact the Registrar. Once we have received notification that you have withdrawn your consent, we will no longer process your application and, subject to our retention policy, we will dispose of your personal data securely.

## **[Data Protection Officer]**

We have appointed Mr Robin Macpherson (Assistant Rector) to ensure this policy is compliant. If you have any questions about this policy or how we handle your personal information, please contact us at [dataprotection@dollaracademy.org.uk](mailto:dataprotection@dollaracademy.org.uk). 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.

Reviewed February 28<sup>th</sup> 2020

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