

## **SHREWSBURY HOUSE SCHOOL TRUST**

### **PRIVACY NOTICE – THE BUS SERVICE**

#### **HOW WE USE YOUR INFORMATION**

This Privacy Notice tells you what to expect when Shrewsbury House School Trust collects personal information. It applies to information we collect about:

- those enquiring about and using our bus service;
- complainants and other individuals in relation to a data protection or Subject Access Request;
- current employees;
- members of the public operating in close proximity to our vehicles;
- visitors, staff, pupils operating on our sites.

#### **Those Enquiring About and Using our Bus Service**

If you make an enquiry regarding the bus service via our website, or as part of the registration process we will retain your name/your child's name and age and postcode information in order to ascertain whether or not it is viable to run a particular bus route. This data will be retained until bus routes are confirmed for that particular academic year, but not beyond that point.

Once your child is using the bus service, data will be used to formulate bus lists which are issued to bus drivers to record attendance on the bus.

#### **Complainants and Other Individuals in Relation to a Data Protection or Subject Access Request**

When we receive a complaint from a person we make up a file containing the details of the complaint. This normally contains the identity of the complainant and any other individuals involved in the complaint.

We will only use the personal information we collect to process the complaint and to check on the level of service we provide. We do compile statistics showing information like the number of complaints we receive, but not in a form which identifies anyone.

We usually have to disclose the complainant's identity to whoever the complaint is about. This is inevitable where, for example, the accuracy of a person's record is in dispute. If a complainant doesn't want information identifying him or her to be disclosed, we will try to respect that. However, it may not be possible to handle a complaint on an anonymous basis.

We will keep personal information contained in complaint files in line with our Data Retention policy. This means that information relating to a complaint will be retained for

two years from closure. It will be retained in a secure environment and access to it will be restricted according to the 'need to know' principle.

Similarly, where enquiries are submitted to us we will only use the information supplied to us to deal with the enquiry and any subsequent issues and to check on the level of service we provide.

### **Current Employees.**

We are required to hold personal data, including medical information, relating to staff members. This is kept to ensure that we are operating within the guidelines set down by the DVLA for minibus drivers and that we are complying with the law.

CCTV images of staff members will be captured in the day to day operational running of the bus service and are recorded in line with our CCTV Policy.

### **Members of the Public Operating in Close Proximity to our Vehicles**

CCTV images recorded by the systems on our buses will capture images both internally and externally on the buses. These images are stored on encrypted SIM cards for a maximum of 28 days and viewed in line with the procedures detailed within our CCTV Policy.

### **Visitors, Staff, Pupils Operating on our Sites**

CCTV images of visitors, staff and pupils will be captured in the day to day operational running of the bus service and are recorded in line with our CCTV Policy.

### **Use of Data for Marketing Purposes**

We will not use the data collected as detailed above for any purposes related to marketing activities and we will not share it with other organisations other than for the purposes highlighted in this notice.

### **You can Also get Further Information on:**

- agreements we have with other organisations for sharing information;
- circumstances where we can pass on personal data without consent for example, to prevent and detect crime and to produce anonymised statistics;
- our instructions to staff on how to collect, use and delete personal data; and
- how we check that the information we hold is accurate and up to date.
- Links to other websites

This Privacy Notice does not cover the links within this site linking to other websites. We encourage you to read the privacy statements on the other websites you visit.

### **Changes to this Privacy Notice**

We keep our privacy notice under regular review. This privacy notice was last updated on 13<sup>th</sup> March 2018.

### **Use of Data Processors**

Data processors are third parties who provide elements of our services for us. We have contracts in place with our data processors. This means that they cannot do anything with your personal information unless we have instructed them to do it. They will not share your personal information with any organisation apart from us. They will hold it securely and retain it for the period we instruct.

### **Use of third Party Organisations Based Outside the European Economic Area**

We do use a third party organisation based outside the European Economic Area to operate our on line enquiry system - Infinity Box Inc., the provider of Wufoo in the United States. Wufoo is an online form builder that strives to provide the easiest way for you to collect information over the internet. Wufoo is used by people who are interested in creating forms to collect information or perform a variety of other tasks ("**Form Creators**") and by people who fill out these forms ("**Form Respondents**"). Wufoo is a service provided by SurveyMonkey.

This privacy statement describes privacy practices which are specific to Wufoo and should be read in conjunction with [SurveyMonkey's main Privacy Policy](#), which also applies to Wufoo to the extent that it is applicable and does not conflict with this privacy statement. In the event of any conflict between this Wufoo Privacy Statement and SurveyMonkey's main Privacy Policy, this Wufoo Privacy Statement shall prevail only with respect to the terms that are specific to Wufoo, and SurveyMonkey's main Privacy Policy shall otherwise govern.

Infinity Box Inc. (the provider of Wufoo in the United States) complies with the [US-EU and US-Swiss Safe Harbor Frameworks](#) developed by the U.S. Department of Commerce regarding the collection, use and retention of personal information from EU member countries and Switzerland. We have certified that we adhere to the Safe Harbor Privacy Principles of notice, choice, onward transfer, security, data integrity, access and enforcement. View our certification on the U.S. Department of Commerce's [Safe Harbor website](#).

For questions regarding our privacy policy or practices, contact SurveyMonkey electronically via [this form](#). If you feel that your question has not been satisfactorily addressed, you may [contact BBB](#), which operates an independent dispute resolution mechanism.

## **PRIVACY FOR FORM RESPONDENTS**

### **1. What information does SurveyMonkey collect?**

#### **Responses to forms.**

We collect and store the responses that you submit to forms. Form Creators are responsible for this data and manage it. A form may ask you to provide personal information or data. If you have any questions about a form you are completing, please contact the Form Creator who created the form directly as SurveyMonkey is not responsible for the content of that form. The creator of the form is usually the same person that invited you to complete the form and sometimes they have their own privacy policy. SurveyMonkey is not liable for any actions or inactions a Form Creator takes with respect to any data or information that they may collect from a Form Respondent.

### **2. How does SurveyMonkey use the information we collect?**

We disclose the information we collect in accordance with [SurveyMonkey's main Privacy Policy](#) for survey respondents (except that references to surveys and survey data should be read as references to forms and form data in the context of Wufoo).

### **3. With whom do we share or disclose your information?**

We disclose the information we collect in accordance with [SurveyMonkey's main Privacy Policy](#) for survey respondents (except that references to surveys and survey data should be read as references to forms and form data in the context of Wufoo).

### **3. What are your rights to your information?**

**Contact the relevant Form Creator to access your responses.** Because we collect form responses on behalf of Form Creators, you will need to contact the Form Creator if you have any questions about the form or want to access, update or delete anything in your responses. We provide Form Creators with tools to maintain the responses they collect via their forms. SurveyMonkey cannot provide you with this access since form responses are the Form Creator's private information.

### **5. Security, cookies and other important information**

**Security.** Each Form Creator is assigned a unique username and password which is required to access his or her Wufoo account. It is each Form Creator's responsibility to protect the security of his or her login information. Regardless of the security protections and

precautions we undertake, there is always a risk that your personal data may be viewed and used by unauthorised third parties as a result of collecting and transmitting your data over the internet.

**Cookies.** See SurveyMonkey's main Privacy Policy for general information about cookies. [Click here](#) for information about specific cookies used by Wufoo.

**Changes to this privacy statement.** This privacy statement may be changed in the same manner as changes that are made to SurveyMonkey's main Privacy Policy.

**Online tracking.** We currently do not process or comply with any web browser's "do not track" signal or other similar mechanism that indicates a request to disable online tracking of individual users who visit the Wufoo website or use the Wufoo services.

### **Complaints or Queries**

Under the Data Protection Act 1998, you have rights as an individual which you can exercise in relation to the information we hold about you.

Shrewsbury House School Trust tries to meet the highest standards when collecting and using personal information. For this reason, we take any complaints we receive about this very seriously. We encourage people to bring it to our attention if they think that our collection or use of information is unfair, misleading or inappropriate. We would also welcome any suggestions for improving our procedures.

This Privacy Notice was drafted with brevity and clarity in mind. It does not provide exhaustive detail of all aspects of the Trust's collection and use of personal information. However, we are happy to provide any additional information or explanation needed. Any requests for this should be sent to the address below.

If you want to make a complaint about the way we have processed your personal information, you can contact us at the address below.

### **Access to Your Data**

Shrewsbury House School Trust tries to be as open as it can be in terms of giving people access to their personal information. Individuals can find out if we hold any personal information by making a 'subject access request' in writing under the Data Protection Act 1998. If we do hold information about you we will:

- give you a description of it;
- tell you why we are holding it;
- tell you who it could be disclosed to; and
- let you have a copy of the information in an intelligible form.
- Please note CCTV and personal data is made available as long as it does not infringe on the rights of other person's personal data i.e. images cannot be shared if they show someone else whose permission cannot be obtained.

### **Errors**

If we do hold information about you, you can ask us to correct any mistakes by, once again, contacting the Data Protection Officer at the address below.

### **Erasure**

You can also ask us to delete the data we hold about you by, once again contacting the Data Protection Officer at the address below.

### **How to Contact Us**

If you want to request information about our privacy policy you can email us or write to:

Data Protection Officer  
Shrewsbury House School Trust  
107 Ditton Rd  
Surbiton  
Surrey  
KT6 6RL