## Privacy notice - School's Out web-app

#### Who we are?

Shropshire Council is the local government authority for Shropshire. Our address is: Shropshire Council, Shirehall, Abbey Foregate, Shrewsbury, SY2 6ND. You can contact our Data Protection Officer on: 01743 252774 or by email at: information.request@shropshire.gov.uk

## How do we collect information from you?

We collect information from you when you visit the School's Out web app, hosted by a third party – <u>Torchbearer Interactive Ltd</u> - <u>Privacy Policy</u>. The app will collect your data when you register your child directly on the app.

## What types of information do we collect from you?

We collect different categories of information about you, depending on the service you want from us and/or the reason why we need to process information relating to you. This could be personal information (for example your name and address), or other more sensitive data that we would only collect and use in very particular circumstances that are set out in law.

## Details of information obtained from third parties?

N/A

#### How is your information used?

We may use your information provided through the School's Out web app only for the following specific purposes:

- So that Shropshire Council can co-ordinate the free holiday activities
  programme effectively; we need to have a registration process so that
  children can be booked onto the activities and so that activity leaders can
  keep them safe while they are there.
- monitoring purposes so that we can provide information to the Department for Education who fund this programme. The data shared for this purpose will be fully anonymised.

The information you provide through the app will only be used by Shropshire Council for this specific purpose and will not be used for any other incompatible purpose/s

#### Research and statistics

Anonymised and pseudonymised data may be used for research & statistical purposes. Any data collected may be used for research and statistical purposes that are relevant and compatible with the purpose that the data was collected for.

## Who has access to your information?

Your full data will only be accessible to a small number of system administrators assigned by the Council with specific permissions. The data will also be held and stored by our third party provider, Torchbearer, who host the app, however they will only store the data as a processor and will not use or access the data.

We may share your information with the following third parties for the reasons detailed:

- Only relevant data will be shared with activity leaders (depending on the
  activity this might be your child's name, their gender, their age, their address,
  their dietary needs, any details of medication required and emergency contact
  details).
  - This information will be shared with the activity leaders to ensure that activities signed up for can be provided to your child. This sharing is therefore necessary to ensure the service signed up for can be provided effectively.
- Anonymised data will be shared with the Department for Education for monitoring purposes and to enable funding for the programme.

We will not sell or rent your information to third parties. We will not share your information with third parties for marketing purposes.

#### Lawful basis

In order to process you and your child's data provided through the app we rely on the following lawful bases:

- Article 6(1)(a) UK GDPR the data subject has given consent to the
  processing of his or her personal data for one or more specific purposes; this
  is when you sign up to use the app and accept the terms of use
- Article 9(2)(a) UK GDPR the data subject has given explicit consent to the processing of those personal data for one or more specified purposes – this is when you consent to how any special category data will be used when you register to use the app
- Article 6(1)(b) UK GDPR processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract; - we will rely on this lawful basis to provide your child with the service signed up for and to share data with activity leaders so any service can then be provided.

#### What are your rights in relation the personal data we process?

**Access** – you can request copies of any of your personal information that is held by the Council.

**Rectification** – you can ask us to correct any incorrect information. **Deletion** – you can ask us to delete your personal information. The Council can

refuse to delete information if we have a lawful reason to keep this.

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**Portability** – you can ask us to transfer your personal data to different services or to you in some circumstances.

**Right to object or restrict processing** – you have the right to object to how your data is being used and how it is going to be used in the future.

**Right to prevent automatic decisions** – you have the right to challenge a decision that affects you that has been made automatically without human intervention, for example an online form with an instant decision.

## How long will we keep your information for?

We keep and dispose of all records in line with our corporate retention schedule. We will comply with Data Protection legislation in regards to how long we keep your data.

# What security precautions in place to protect the loss, misuse or alteration of your information?

We are strongly committed to data security and will take reasonable and appropriate steps to protect your personal information from unauthorised access, loss, misuse, alteration or corruption. We have put in place physical, electronic, and managerial procedures to safeguard the information you provide to us. However, we cannot guarantee the security of any information you transmit to us. We recommend that you take every precaution to protect your personal information.

## Keeping your data up to date

We want to ensure any information we hold is accurate. You can help us by promptly informing us of any changes to the information we hold about you.

## Details of any automated decision processes

N/A

#### Under 13

If you are accessing online services and are under the age of 13, please get your parent/guardian's permission beforehand whenever you provide us with personal information.

#### Cookies & IP addresses

#### What are Cookies and why are they used?

Cookies are small text files which identify your computer to our servers. They are used to improve the user experience. View what cookies we use and how you can manage them at <a href="https://shropshire.gov.uk/website-information/use-of-cookies/">https://shropshire.gov.uk/website-information/use-of-cookies/</a>

## **Complaints**

If you would like to make a complaint regarding the use of your personal data you can contact our Data Protection Officer;

**By Post**: Information Governance

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Shropshire Council, Shirehall, Abbey Foregate, Shrewsbury, SY2 6ND

**By phone**: 01743 252774

By email: information.request@shropshire.gov.uk

For independent advice about data protection, privacy and data sharing issues, you can contact the Information Commissioner's Office (ICO):

By Post: Information Commissioner's Office

Wycliffe House Water Lane Wilmslow Cheshire SK9 5AF

**By phone**: 0303 123 1113 (local rate) or 01625 545 745 if you prefer to use a national rate number

Alternatively, visit ico.org.uk or email casework@ico.org.uk