



# MERCHANT TAYLORS'

## Prep

### **TRANSPARENCY NOTICE FOR PUPIL APPLICANTS**

*Merchant Taylors' Prep's GDPR Transparency Notice For Pupil Applicants*

The General Data Protection Regulations 2018 protects an individual's rights in respect of their personal information and personal data. The following rights exist for individuals:

- Right to be informed how data is used by the School. (As set out below in this notice).
- Right of access to personal data held by the School.
- Right of rectification where personal data can be rectified if it is inaccurate or incomplete.
- Right of erasure also known as the "right of erasure" is to enable an individual to request the deletion or removal of personal data where there is no compelling reason for its continued processing.
- Right to restrict processing in order to 'block' or suppress processing of personal data in certain circumstances e.g. where the data is inaccurate or the processing was unlawful, so that particular data is merely held but not processed.
- Right to data portability allows individuals to obtain and reuse their personal data for their own purposes across different services.
- Right to object to processing based on legitimate interests, direct marketing or processing for purposes of scientific/historical research and statistics.
- Right to object to decisions made automated individual decision-making (making a decision solely by automated means without any human involvement).

Merchant Taylors' Prep holds and processed significant amounts of 'personal data' about members of the School community. Under the Act, the School must process such personal data 'fairly'. The GDPR say that the information provided to data subjects about how the School processes their personal data must be:

- Concise, transparent, intelligible and easily accessible;
- Written in clear and plain language, particularly if addressed to a child under 13 years of age;
- Free of charge.

The School's Information Commissioner's Office registration number is Z1736933 and its registered address is Merchant Taylors' Prep School. The School Address is Moor Farm, Sandy Lodge Road, Rickmansworth, Hertfordshire, WD3 1LW.

Whilst Merchant Taylors' Prep is the Data Controller for the School, the School has appointed the Senior Deputy Head (SDH) as its Privacy Officer to endeavour to ensure that all personal data is processed in compliance with this policy and the Regulations. In the event if queries arise, the SDH may be contacted at the School via email: [office@mtpn.org.uk](mailto:office@mtpn.org.uk) or telephone, 01923 825648 or via written communication sent to the School postal address.

This privacy notice will be provided to you at the time your data is being obtained, if it is being obtained directly.

Data will be processed for the purposes of responding to requests for information about applying to and joining the School. Merchant Taylors' Prep will therefore have a "legitimate interest" for processing basic personal data and sensitive personal data. The data the School holds will be the minimum it requires to form and maintain the contract between you and the School.

The School will use process personal pupil data about individuals for a number of purposes as part of its 'legitimate interest' and 'business' operations, including as follows:

- Names, dates of birth, addresses, telephone numbers, e-mail addresses, other contact details and nationality;
- Bank details and other financial information, e.g. about parents who pay application fees to the School;
- Where appropriate, information about individuals' health, and contact details for their next of kin;
- References given by the feeder School about applicants, and information provided by previous educational establishments and/or other professionals or organisations working with applicants;

Occasionally, the School will need to share personal information relating to its community with third parties, such as professional advisers (e.g. health care professionals, psychologists, counsellors, lawyers and accountants) or relevant authorities (e.g. police or the local authority).

In the case of boys that apply to Merchant Taylors' Prep, but are unsuccessful in their application, personal data will be retained for seven years after the conclusion of their application.

With the exception of a confidential reference from an applicant's feeder School or Nursery, we will obtain the data the School requires from the pupil, his parents or guardians directly. Should we need data from other sources we will contact you within a month of the date at which the School acquired the additional data.

We see the provision of personal data as necessary to properly admit each applicant to the School and for the School to fulfil its obligations under the contract once each pupil begins his education at the School.

There is no automated decision making or profiling involved in the Merchant Taylors' Prep application process or during a pupil's time at the School.

The School has a statutory obligation to establish nationality and hence the right of residency of its pupils.

Applicants can make subject access requests for their own personal data, provided that, in the reasonable opinion of the School, they have sufficient maturity to understand the request they are making. Applicants aged 13 or over are generally assumed to have this level of maturity. All subject access requests from pupils will therefore be considered on a case-by-case basis.

A person with parental responsibility will generally be expected to make a subject access request on behalf of younger pupils. A pupil of any age may ask a parent or other representative to make a subject access request on his behalf.

If an individual believes that the School has not complied with this policy or acted otherwise than in accordance with the Act, they should utilise the School complaints procedure and should also notify the SDH. An individual can also make a referral to or lodge a complaint with the Information

Commissioner's Office (ICO), Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF. Tel (01626) 545 700. However, the ICO recommends that steps are taken to resolve the matter with the School before involving the regulator.

The School will update this Transparency Notice from time to time. Any substantial changes that affect your rights will be provided to you directly as far as is reasonably practicable. Further details on personal data protection can be obtained in the School's Privacy Notice.

Senior Leadership Team

April 2019

Review Date April 2020