

Association des Parents du Lycée français Charles de Gaulle - Privacy Policy

The Association des Parents du Lycée français Charles de Gaulle (“APL”) is a simple unincorporated association under English law. The registered address is 35 Cromwell Road, London SW7 2DG.

The primary objective of APL is to represent the families of children and young people attending the Lycée Français Charles de Gaulle (the “**Lycée**”), to provide a forum where these families may ask questions, obtain information and share ideas and concerns in relation to their children’s education, and to liaise with the Lycée on their behalf.

APL works alongside the APL Welfare Fund and Friends of the Lycée, with regards to the annual Fundraising Campaign in order of raising funds to support children and families attending the Lycée.

To support the objectives of APL, we work with entities able to provide advice, services or funds. We may contact parents, private individuals, companies, charities or private and public organisations connected with our community.

APL is committed to protecting your privacy. At all times we aim to respect any personal information you share with us, or what we share or receive from other organisations, and keep it safe. This Privacy Policy (“**Policy**”) explains how and why we collect and use personal information about you and your rights and options.

The provision of your personal information to us is voluntary. However, without providing us with your personal information, your interaction with us might be impacted, for example you might not be able to stay in touch with us.

Please read this policy carefully to understand how we will collect, use and store your personal information. We may update this policy from time to time without notice to you, so please check it regularly.

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1. **How do we collect your personal information?**

1.1 We collect your personal information:

(a) When you give it to us **directly**

For example, personal information that you give to us through paper forms or personal information that you give to us when you communicate with us by email, phone or letter.

(b) When we obtain it **indirectly**

For example, when working together with other organisations or charities, we may receive your personal information from them. Where this happens, you will be notified, and we will tell you how and why we intend to use that personal information, unless we have previously notified you.

(c) When it is available publicly

Your personal information may be available to us from external publicly available sources. For example, depending on your privacy settings for social media services, we may access information from those accounts or services.

2. **What personal information do we use?**

2.1 We may collect, store and otherwise use the following kinds of personal information:

- (a) your full name and contact details, including postal address, telephone number, email address;
- (b) your financial information, such as bank details and/or credit/debit card details, account holder name, sort code and account number;
- (c) information about your computer/mobile device and your visits to and use of this website including, for example, your IP address and information about which pages you access;
- (d) donation and gift aid details;
- (e) information you provide us with through face-to-face conversations or by telephone;
- (f) information about our services which you use/which we consider may be of interest to you; and/or
- (g) any other personal information which you choose to share with us or we obtain as per Section 1.

2.2 **Do we process special categories of personal information?**

- 2.2.1 The EU General Data Protection Regulation (“**GDPR**”) recognises certain categories of personal information as sensitive and therefore requiring more protection, for example information about your health, ethnicity and political opinions.

2.2.2 In certain situations, APL may collect and/or use these special categories of personal information (for example, in case we need to know about any medical or access requirements so that you can attend one of our events). We will only use these special categories of personal information if there is a valid reason for doing so and where the GDPR allows us to do so.

3. **How and why will we use your personal information?**

3.1 Your personal information will be used for the purposes specified in this Policy. In particular, we may use your personal information:

- (a) to provide you with services, products or information you have requested;
- (b) to register and administer your participation in events;
- (c) to provide further information about our work, services, activities or products;
- (d) to process payments you make to us;
- (e) to answer your questions/communicate with you in general;
- (f) to analyse and improve our work, services, activities, products or information, or for our internal records;
- (g) to further our charitable aims in general;
- (h) to audit and/or administer our accounts;
- (i) to satisfy legal obligations which are binding on us, for example in relation to regulatory, government and/or law enforcement bodies with whom we may work;
- (j) for the prevention of fraud or misuse of services; and/or
- (k) for the establishment, defence and/or enforcement of legal claims.

4. **Lawful bases**

4.1 The GDPR requires us to rely on one or more lawful bases to use your personal information. We consider the bases listed below to be relevant:

- (a) Where you have provided your **consent** for us to use your personal information in a certain way (for example, we will ask for your consent to send you marketing material by email)
- (b) Where necessary so that we can **comply with a legal obligation** to which we are subject (for example, where we are obliged to share your personal information with regulatory bodies which govern our work and services).
- (c) Where **necessary for the performance of a contract** to which you are a party or to take steps at your request prior to entering a contract (for example, purchasing an auction item).

- (d) Where it is in your/someone else's **vital interests** (for example, in case of a medical emergency suffered an attendee at one of our events).
- (e) Where there is a **legitimate interest** in us doing so.

The GDPR allows us to collect and process your personal information if it is reasonably necessary to achieve our or others' legitimate interests (as long as that processing is fair, balanced and does not unduly impact your rights).

When we process your personal information to achieve such legitimate interests, we consider and balance any potential impact on you, and your rights under data protection laws. We will not use your personal information for activities where our interests are overridden by the impact on you, for example where use would be excessively intrusive unless, for instance, we are otherwise required or permitted to by law.

5. **Communicating for marketing/promotion**

- 5.1 We may use your contact details to provide you with information about our work, events, services and/or products which we consider may be of interest to you.
- 5.2 Where we do this via email, SMS or telephone (where you are registered with the Telephone Preference Service), we will not do so without your prior consent (unless allowed to do so via applicable law).
- 5.3 When you have provided us with your consent previously but do not wish to be contacted by us about our work, events, services and/or products anymore, please let us know by email at info@apl-cdg.org.uk. You can also opt out of receiving emails from APL at any time by clicking the "unsubscribe" link at the bottom of our emails.

6. **Children's personal information**

- 6.1 When we process children's personal information, where required we will not do so without their consent or, where required, the consent of a parent/guardian. We will always have in place appropriate safeguards to ensure that children's personal information is handled with due care.

7. **How long do we keep your personal information?**

In general, unless still required in connection with the purpose(s) for which it was collected and/or is used, we remove your personal information from our records six years after the date on which it was collected. However, if before that date:

- (i) your personal information is no longer required in connection with such purpose(s);
- (ii) we are no longer lawfully entitled to process it; or
- (iii) you validly exercise your right of erasure (please see Section 11.1(b) below) we will remove it from our records at the relevant time.

In order to check whether your personal information is still required in relation to the purpose(s) for which it was collected and/or used, we will review our database every year.

Where no longer required in connection with such purpose(s), your personal information will be securely deleted.

8. Will we share your personal information?

8.1 We do not sell or rent your personal information to third parties for marketing purposes.

8.2 However, we may disclose your personal information to selected third parties in order to achieve the purposes set out in this Policy. Those parties may include (but are not limited to):

- (a) the APL Welfare Fund and Friends of the Lycée for joint fundraising purposes
- (b) our suppliers, service providers, agents, subcontractors and/or other similar organisations for the performance of contracts we enter into with them (for example IT service providers, such as software developers or network security providers). Please be assured that we only disclose the personal information necessary to deliver the service in question and we have a contract in place that requires them to handle your personal information in line with applicable data protection laws;
- (c) financial companies that process payments or donations on our behalf;
- (d) professional service providers such as accountants and lawyers;
- (e) parties assisting us with research to monitor the impact/effectiveness of our work;
- (f) regulatory authorities, such as tax authorities; and/or
- (g) analytics and search engine providers.

8.3 In particular, we reserve the right to disclose your personal information to third parties:

- (a) in the event that we sell or buy any business or assets, in which case we will disclose your personal information to the (prospective) seller or buyer of such business or assets;
- (b) if substantially all of our assets are acquired by a third party, personal information held by us may be one of the transferred assets;
- (c) if we are under any legal or regulatory duty to do so; and/or
- (d) to protect the rights, property or safety of APL, its personnel, users, visitors and others.

9. Security/storage of and access to your personal information

9.1 APL is committed to keeping your personal information safe and secure and we have appropriate and proportionate security policies and organisational and technical measures in place to help protect your information.

9.2 Your personal information is only accessible by appropriately trained staff, volunteers and contractors, and stored on secure servers with features enacted to prevent unauthorised access.

10. **International transfers of your personal information**

- 10.1 Given that we are a UK-based organisation, we will normally only transfer your personal information within the UK or European Economic Area (“**EEA**”), where all countries have the same level of data protection law under the GDPR.
- 10.2 Please note that some countries outside the UK or EEA have a lower standard of protection for personal information, including lower security requirements and fewer rights for individuals. Where your personal information is transferred, stored and/or otherwise processed outside the UK or EEA in a country that does not offer an equivalent standard of protection to the UK or EEA, we will take all reasonable steps necessary to ensure that the recipient implements appropriate safeguards (such as by entering into standard contractual clauses approved by the European Commission) designed to protect your personal information and to ensure that your personal information is treated securely and in accordance with this Policy. If you have any questions about the transfer of your personal information, please contact us using the details in Section 13 below.
- 10.3 Unfortunately, no transmission of your personal information over the internet can be guaranteed to be 100% secure – however, once we have received your personal information, we will use strict procedures and security features to try and prevent unauthorised access.

11. **Your rights and how to exercise them**

- 11.1 Where we rely on your consent to use your personal information, you have the right to withdraw that consent at any time. This includes the right to ask us to stop using your personal information for marketing or fundraising purposes, or to unsubscribe from our email list at any time. You also have the following rights:
- (a) **Right of access** – you can write to us to ask for confirmation of what personal information we hold on you and to request a copy of that personal information. Provided we are satisfied that you are entitled to see the personal information requested and we have successfully confirmed your identity, we will provide you with your personal information subject to any exemptions that apply.
 - (b) **Right of erasure** – at your request we will delete your personal information from our records as far as we are required to do so. In many cases we shall suppress your personal information in order to stop further communications with you, rather than delete all of your personal information.
 - (c) **Right of rectification** – if you believe our records of your personal information are inaccurate, you have the right to ask for those records to be updated. You can also ask us to check the personal information we hold about you if you are unsure whether it is accurate/up to date.
 - (d) **Right to restrict processing** – you have the right to ask for processing of your personal information to be restricted if there is disagreement about its accuracy or legitimate use.

- (e) **Right to object** – you have the right to object to processing where we are
 - (i) processing your personal information on the basis of the legitimate interests basis;
 - (ii) using your personal information for direct marketing; or
 - (iii) using your information for statistical purposes.
- (f) **Right to data portability** – to the extent required by the GDPR, where we are processing your personal information (that you have provided to us) either
 - (i) by relying on your consent; or
 - (ii) because such processing is necessary for the performance of a contract to which you are a party or to take steps at your request prior to entering into a contract, and in either case we are processing your personal information using automated means (i.e. with no human involvement), you may ask us to provide the personal information to you – or another service provider – in a machine-readable format.
- (g) **Rights related to automated decision-making** – you have the right not to be subject to a decision based solely on automated processing of your personal information which produces legal effects or similarly significantly affects you, unless such a decision:
 - (i) is necessary to enter into/perform a contract between you and us/another organisation;
 - (ii) is authorised by EU or Member State law to which APL is subject (as long as that law offers you sufficient protection); or
 - (iii) is based on your explicit consent.

11.2 Please note that some of these rights only apply in limited circumstances. For more information, we suggest that you contact us using the details in Section 13 below.

11.3 We encourage you to raise any concerns or complaints you have about the way we use your personal information by contacting us using the details in Section 13 below.

11.4 You may further make a complaint to the Information Commissioner's Office – www.ico.org.uk. For further information on how to exercise this right, please contact us using the details in Section 14 below.

12. **Changes to this Policy**

12.1 We may update this Policy from time to time. We will notify you of significant changes by contacting you directly where reasonably possible for us to do so and by placing a notice of update on our website. This Policy was last updated on 25th May 2018.

13. **How to contact us**

13.1 If you have any questions about how we use your personal information, please contact us using the following details:

Email: info@apl-cdg.org.uk

Post: APL, 35 Cromwell Road, London SW7 2DG