



POLICY TITLE: PRIVACY POLICY 'DCCT PRIMARY AND SECONDARY SCHOOL PROGRAMMES'
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Data Compliance Manager	Paul Newman
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Review date	11/12/25
Review Committee	Finance and Governance

DERBY COUNTY COMMUNITY TRUST

'DCCT Primary and Secondary School Programmes'

SCHEME SPECIFIC PRIVACY POLICY

1. INTRODUCTION

- 1.1 Welcome to Derby County Community Trust's ("**DCCT**") Scheme Specific Privacy Policy for 'DCCT Primary and Secondary School Programmes'. References to **we**, **us** and **our** are references to the DCCT.
- 1.2 We respect your privacy and are committed to protecting your personal data. This Scheme Specific Privacy Policy will inform you as to how we process your personal data when you enquire about, register for or participate in the Programme and tell you about your privacy rights and how the law protects you.
- 1.3 This Scheme Specific Privacy Policy is to be read in conjunction with the DCCT Central Privacy Policy and the DCCT privacy policy which can be found at <https://www.derbycountycommunitytrust.com/additional-information/privacy-policy> and in particular in relation to information regarding international transfers, data security, data retention and your legal rights. It is important that you read this Scheme Specific Privacy Policy together with any other privacy notice or fair processing notice we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This Scheme Specific Privacy Policy

supplements the other notices and is not intended to override them.

2. IMPORTANT CONTACT INFORMATION

- 2.1 We are the controller and are responsible for your personal data. References to **we**, **us** or **our** in this Scheme Specific Privacy Policy are to DCCT only.

Our full details are: Derby County Community Trust registered in England and Wales under number 06498920 and our registered office is at 14 Pride Point Drive, Pride Park, Derby, DE24 8BX

Full name of legal entity: Derby County Community Trust.

Email address: data@dcct.co.uk

Postal address: 14 Pride Point Drive, Pride Park, Derby, Derbyshire, England, DE24 8BX.

Telephone number: 01332 416140

- 2.2 If you have any questions about this Scheme Specific Privacy Policy or would like to see any historic versions please contact us at data@dcct.co.uk.
- 2.3 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 (www.ico.org.uk). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

3. THE DATA WE COLLECT ABOUT YOU

- 3.1 For the purposes of the 'DCCT Primary and Secondary School Programmes' we may collect, use, store and transfer different kinds of personal data about you which we have grouped together follows:
- 3.1.1 **Identity Data** – includes first name, last name, username or similar identifier, title, date of birth, gender, ethnicity and photographs.
- 3.1.2 **Contact Data** – includes billing address, delivery address, email address and telephone numbers.
- 3.1.3 **Welfare Data** – includes special educational needs and disabilities, medical conditions and allergies.
- 3.1.4 **Safeguarding Data** – includes information ascertaining to accidents, incidents, concerns and

complaints.

- 3.1.5 **Financial Data** – includes bank account and payment card details.
- 3.1.6 **Transaction Data** – includes details about payments to and from you and other details of services you have purchased from us.
- 3.1.7 **Technical Data** – includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access this website.
- 3.1.8 **Profile Data** – includes your username and password, purchases or orders made by you, your interests, preferences, feedback and survey responses.
- 3.1.9 **Usage Data** – includes information about how you use our website and services.
- 3.1.10 **Marketing and Communications Data** – includes your preferences in receiving marketing from us and our third parties and your communication preferences.

3.2 We refer to the above categories of data in the processing table below in clause 4.2.

3.3 Where we collect any **Special Categories of Personal Data** about you (this includes details about your race or ethnicity, information about your health and biometric data this information is provided by way of **Welfare Data** and identified as such in our processing table. We may also collect information about criminal convictions and offences. Further legal controls apply to data relating to criminal convictions and allegations of criminal activity. All such information is collected in accordance with this Scheme Specific Privacy Policy and the DCCT privacy policy which can be found at <https://www.derbycountycommunitytrust.com/additional-information/privacy-policy>. We have in place appropriate policy documents and/or other safeguards which we are required by law to maintain when processing such data.

4. **PURPOSES FOR WHICH WE WILL USE YOUR PERSONAL DATA**

4.1 We have set out below, in a table format, a description of all the ways we plan to use your personal data in respect of the Programme, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

4.2 Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data and, if you are applying for or participating in another programme managed by us another privacy policy may apply. Please contact us if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To respond to your enquiry	(a) Identity (b) Contact (c) Welfare (if provided in your enquiry)	Performance of a contract with you
To register you as a participant	(a) Identity (b) Contact (c) Welfare	Performance of a contract with you
To deliver the Programme to you and enable your Participation which may include: (a) Managing payments, fees and charges (b) Collecting and recovering money owed to us (c) Updating you as to Programme events and changes	(a) Identity (b) Contact (c) Welfare (d) Financial (e) Transaction (f) Marketing and Communications	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to recover debts due to us)
To manage our relationship with you which will include: (a) Notifying you about changes to our terms or privacy policy	(a) Identity (b) Contact (c) Profile (d) Marketing and	(a) Performance of a contract with you (b) Necessary to comply with a legal obligation (c) Necessary for our

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
(b) Asking you to leave a review or take a survey	Communications	legitimate interests (to keep our records updated and to study how participants use our services)
To enable you to partake in a prize draw, competition or complete a survey	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to study how participants use our services, to develop them and grow our organisation)
To administer and protect our organisation	(a) Identity (b) Contact (c) Technical	(d) Necessary for our legitimate interests (for running our organisation, provision of administration and IT services, network security, to prevent fraud and in the context of a reorganisation or restructuring exercise) (e) Necessary to comply with a legal obligation
To make suggestions and recommendations to you about programmes, activities or events that	(a) Identity (b) Contact (c) Technical	Necessary for our legitimate interests (to develop our services and grow our organisation)

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
may be of interest to you	(d) Usage (e) Profile	

5. MARKETING AND PROMOTIONAL OFFERS

- 5.1 You can manage your marketing preferences or opt out of marketing at any time by following the opt-out links on any marketing message sent to you or by contacting us at any time.
- 5.2 We may use your Identity, Contact, Technical, Usage and Profile Data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which services may be relevant for you (we call this marketing).
- 5.3 You will receive marketing communications from us if you have requested information from us or registered for a Programme with us or if you provided us with your details when you entered a competition or registered for a promotion and, you have not opted out of receiving that marketing.

6. DISCLOSURES OF YOUR PERSONAL DATA

- 6.1 We may have to share your personal data with the parties set out below for the purposes set out in the table above.
- 6.1.1 Other DCCT departments and programme coordinators;
- 6.1.2 External third parties identified in programme specific service level agreements and/or data sharing agreements where we outline how and why your data would be shared.

7. INTERNATIONAL TRANSFERS

- 7.1 We do not transfer your personal data outside the European Economic Area ("**EEA**").
- 7.2 In the event that we do require to transfer your personal data out of the EEA, we will notify you by way of update to this Scheme Specific Privacy Policy and ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:
- 7.2.1 We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data by the European Commission.

- 7.2.2 Where we use certain service providers, we may use specific contracts approved by the European Commission which give personal data the same protection it has in Europe.
- 7.2.3 Where we use providers based in the US, we may transfer data to them if they are part of the Privacy Shield which requires them to provide similar protection to personal data shared between the Europe and the US.
- 7.2.4 In the event of such an update, please contact us if you want further information on the specific mechanism used by us when transferring your personal data out of the EEA.