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# Data Protection Policy

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## Definitions

<b>Charity / School</b>	means Glasgow Russian School, a registered charity.
<b>GDPR</b>	means the General Data Protection Regulation.

### 1. Data protection principles

The Charity is committed to processing data in accordance with its responsibilities under the GDPR.

Article 5 of the GDPR requires that personal data shall be:

- a) processed lawfully, fairly and in a transparent manner in relation to individuals;
- b) collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes; further processing for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes shall not be considered to be incompatible with the initial purposes;
- c) adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed;
- d) accurate and, where necessary, kept up to date; every reasonable step must be taken to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay;
- e) kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed; personal data may be stored for longer periods insofar as the personal data will be processed solely for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes subject to implementation of the appropriate technical and organisational measures required by the GDPR in order to safeguard the rights and freedoms of individuals; and
- f) processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures.

## **2. General provisions**

- a) This policy applies to all personal data processed by the Charity.
- b) This policy shall be reviewed regularly.

## **3. What Personal Data we collect and Why we need it**

- a) When you enrol or register with the School or renew your enrolment (including if you are registering or renewing on behalf of a child under the age of 18), we will ask you for the following personal information:
  - contact details – name, address, email address, telephone number(s) and date of birth;
  - registration category – e.g. pupil, parent, teacher; and
  - equality information – disability (if any) and religious belief.
- b) We need to collect personal information so that we can register pupils to study at the School. We will use our members' personal information to:
  - set up your registration account on our database; and
  - send you communications by email in relation to essential School information and services, including but not limited to, School timetable and any alterations, School events as part of the curriculum, enrolment renewals and information on any news/decisions/rules as set out by the School Committee.
- c) The Charity shall ensure that personal data are adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed.
- d) We will never share your personal information with third parties unless we have your permission or are required by law to do so.

## **4. Lawful, fair and transparent processing**

- a) All data processed by the Charity must be done on one of the following lawful bases: consent, enrolment form, legal obligation, vital interests, public task or legitimate interests.
- b) Where consent is relied upon as a lawful basis for processing data, evidence of opt-in consent shall be kept with the personal data.
- c) Individuals have the right to access their personal data and any such requests made to the Charity shall be dealt with in a timely manner.

## **5. Accuracy**

- a) The Charity shall take reasonable steps to ensure personal data is accurate.
- b) Where necessary for the lawful basis on which data is processed, steps shall be put in place to ensure that personal data is kept up to date.
- c) If you believe that any of your personal information is inaccurate or incomplete, you have a right to request that we correct or complete your personal information.

## **6. Archiving / removal**

- a) To ensure that personal data is kept for no longer than necessary, the Charity will only keep personal information for as long as necessary to provide the services. Unless you ask us not to, we will review and possibly delete your personal information where you have not renewed your enrolment with us for six years.
- b) If you wish us to delete your personal information, you may request that we do so.

## **7. Security**

- a) The Charity shall ensure that personal data is stored securely using modern software that is kept-up-to-date.
- b) Access to personal data shall be limited to personnel who need access and appropriate security should be in place to avoid unauthorised sharing of information.
- c) When personal data is deleted, this should be done safely such that the data is irrecoverable.
- d) Appropriate back-up and disaster recovery solutions shall be in place.

END OF POLICY