



Under data protection law, individuals have a right to be informed about how the Trust/school uses any personal data that we hold about them. We comply with this right by providing 'privacy notices' to individuals where we are processing their personal data.

This privacy notice explains how we collect, store and use personal data about individuals working with our Trust in a voluntary capacity.

The Trust (c/o St Martin de Porres Catholic Primary School, Pastures Way, Luton, LU4 0PF) is the data controller for the purpose of data protection law.

The Data Protection Officer ('DPO') can be contacted via [mgilmartin@stcat.co.uk](mailto:mgilmartin@stcat.co.uk); 01582 361601 (postal address: c/o St Martin De Porres Catholic Primary School, Pastures Way, Luton, LU4 0PF).

### What categories of information do you collect, process, hold and share?

We process data relating to those we employ, or otherwise engage, to work at our schools. Personal data that we may collect, use, store and share (when appropriate) about you includes, but is not restricted to:

- Contact details
- References
- Governance details (such as role, start and end dates and Governor ID)
- Identification document for the purposes of DBS checks (bank statements, passport details etc)
- Employment details
- Information about business and pecuniary interests

We may also collect, use, store and share (when appropriate) information about you that falls into "special categories" of more sensitive personal data. This includes, but is not restricted to:

- Information about any health conditions you have that we need to be aware of
- Information about disability and access requirements
- Photographs and CCTV images captured in school
- Your image/voice via online meetings

We may also collect, use, store and share (when appropriate) information about criminal convictions and offences.

We may also hold data about you that we have received from other organisations, including other schools and social services, and the Disclosure and Barring Service in respect of criminal offence data.

### Why do we collect and use your information?

The purpose of processing this data is to help us run the schools, including to:

- Establish and maintain effective governance
- Meet statutory obligations for publishing and sharing Directors and Governors details

- Facilitate safe recruitment, as part of our safeguarding obligations towards pupils
- Undertake equalities monitoring
- Ensure that appropriate access arrangements can be provided for volunteers who require them

## Use of personal data in automated decision making and profiling

We do not currently process any personal data through automated decision making or profiling. If this changes in the future, we will amend any relevant privacy notices in order to explain the processing to you, including your right to object to it.

## The lawful basis on which we process this information

We only collect and use personal information about you when the law allows us to. Most commonly, we use it where we need to:

- Comply with a legal obligation
- Carry out a task in the public interest

Less commonly, we may also use personal information about you where:

- You have given us consent to use it in a certain way
- We need to protect your vital interests (or someone else's interests)
- We have legitimate interests in processing the data

Where you have provided us with consent to use your data, you may withdraw this consent at any time. We will make this clear when requesting your consent and explain how you go about withdrawing consent if you wish to do so.

Some of the reasons listed above for collecting and using personal information about you overlap, and there may be several grounds which justify the Trust's use of your data.

## Data Protection Principles

1. Personal data shall be processed fairly and lawfully and, in particular, shall not be processed unless;
  - (a) at least one of the conditions in Schedule 2 is met, and
  - (b) in the case of sensitive personal data, at least one of the conditions in Schedule 3 is also met.
2. Personal data shall be obtained only for one or more specified and lawful purposes, and shall not be further processed in any manner incompatible with that purpose or those purposes.
3. Personal data shall be adequate, relevant and not excessive in relation to the purpose or purposes for which they are processed.
4. Personal data shall be accurate and, where necessary, kept up to date.
5. Personal data processed for any purpose or purposes shall not be kept for longer than is necessary for that purpose or those purposes.
6. Personal data shall be processed in accordance with the rights of data subjects under this Act.
7. Appropriate technical and organisational measures shall be taken against unauthorised or unlawful processing of personal data and against accidental loss or destruction of, or damage to, personal data.
8. Personal data shall not be transferred to a country or territory outside the UK unless that country or territory ensures an adequate level of protection for the rights and freedoms of data subjects in relation to the processing of personal data.

## Collecting this information

While the majority of information we collect about you is mandatory, there is some information that can be provided voluntarily.

Whenever we seek to collect information from you, we make it clear whether you must provide this information (and if so, what the possible consequences are of not complying), or whether you have a choice.

Most of the data we hold about you will come from you, but we may also hold data about you from:

- Local authorities
- Government departments or agencies
- Police forces, courts, tribunals

## Storing this information

In accordance with GDPR, the Trust does not store personal data indefinitely; data is only stored for as long as necessary to complete the task for which it was originally collected.

This information may be stored in physical form or electronically both within the Trust and via cloud/online.

## Who we share this information with?

We do not share information about you with any third party without consent unless the law and our policies allow us to do so.

Where it is legally required, or necessary (and it complies with data protection law), we may share personal information about you with:

- The relevant local authority – to meet our legal obligations to share certain information with it, such as safeguarding concerns
- Government departments or agencies
- The Diocese and NORES
- OFSTED
- Suppliers and service providers:
  - SchoolsHR
- Our auditors
- Security organisations
- Professional advisers and consultants
- Police forces, courts, tribunals

## Transferring data internationally

Where we transfer personal data to a country or territory outside the UK, we will do so in accordance with data protection law.

## Use of Mailchimp (Email Communications Platform)

The Trust uses Mailchimp, a communication platform provided by The Rocket Science Group LLC (Intuit), to send newsletters, updates, surveys and other Trust-related communications to staff. Mailchimp acts as a data processor and only processes your data under our instructions.

Data shared with Mailchimp includes your name, work email address and engagement data (such as email opens and clicks). We do not upload any sensitive or special category data to Mailchimp.

Mailchimp processes data in the United States; these transfers are permitted under UK data protection law because Intuit participates in the Data Privacy Framework with the UK Extension. The Trust also uses the UK Addendum to the EU Standard Contractual Clauses as a supplementary safeguard where appropriate.

Mailchimp applies strong security protections including encryption, MFA, account isolation and regular

penetration testing. The Trust applies additional controls such as restricted role-based access.

## Requesting access to your personal data

Under data protection legislation, you have the right to request access to information about you that we hold. To make a request for your personal information, contact the DPO.

You also have the right to:

- Object to processing of personal data that is likely to cause, or is causing, damage or distress
- Prevent processing for the purpose of direct marketing
- Object to decisions being taken by automated means
- In certain circumstances, have inaccurate personal data rectified, blocked, erased or destroyed; and
- Claim compensation damages caused by a breach of the Data Protection regulations

If you have a concern about the way we are collecting or using your personal data, we ask that you raise your concern with us in the first instance. Alternatively, you can contact the Information Commissioner's Office at <https://ico.org.uk/concerns/>

## Complaints

We take any complaints about our collection and use of personal information very seriously. If you think that our collection or use of personal information is unfair, misleading or inappropriate, or have any other concern about our data processing, please raise this with us in the first instance.

To make a complaint, in the first instance please contact the DPO. If you are unsatisfied with the response to your complaint, you can make a complaint to the Information Commissioner's Office:

- Report a concern online at <https://ico.org.uk/concerns/>
- Call 0303 123 1113
- Or write to: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF

## Further information

If you have any questions, concern or would like more information, please contact the DPO, [mgilmartin@stcat.co.uk](mailto:mgilmartin@stcat.co.uk); 01582 361601; c/o St Martin de Porres Catholic Primary School, Pastures Way, Luton, LU4 0PF.

**M Gilmartin, Data Protection Officer**  
**February 2026**