



The Tiffin School Foundation Privacy Notice: Visitors, Hires and Neighbours

December 2025

1. Introduction

Under UK data protection law, individuals have a right to be informed about how The Tiffin School Foundation uses any personal data that we hold about them. We comply with this right by providing 'privacy notices' (sometimes called 'fair processing notices') to individuals where we are processing their personal data.

This privacy notice explains how we collect, store and use personal data about **visitors to sites owned by The Tiffin School Foundation, clients who have a licence to use our sites or facilities, and neighbours.**

We, The Tiffin School Foundation, Queen Elizabeth Road, Kingston upon Thames, KT2 6RL, tel: 020 546 4638, are the 'data controller' for the purposes of UK data protection law.

2. The personal data we hold

Personal data that we may collect, use, store and share (when appropriate) about you includes, but is not restricted to:

- Name
- Contact details
- Information relating to your visit, e.g. your company or organisation name, arrival and departure time, vehicle number plate
- Information about your use of our site or facilities

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 access arrangements that may be required
- Photographs for identification purposes for the duration of your visit
- Photographs and video footage captured on sites in Kingston and the Grists Memorial Sports Ground, which are owned by The Tiffin School Foundation
- Information relating to safeguarding e.g. DBS checks

3. Why we use this data

We use the data listed above to:

- a. Identify you and keep you safe while on sites owned by The Tiffin School Foundation
- b. Keep children and young adults who use our sites, and our staff and volunteers, safe
- c. Maintain accurate records of visits to sites owned by The Tiffin School Foundation
- d. Provide appropriate access arrangements

- e. Make sure our information and communication systems, equipment and facilities are used appropriately, legally and safely
- f. Understand and address issues concerning our properties
- g. Meet legal requirements placed upon us

We will only use your personal information for the purposes for which we have collected it, unless we reasonably consider that we need to use it for any other reason and that reason is compatible with the original purpose. If we need to use your personal information for an unrelated purpose, we will notify you and explain the legal basis which allows us to do so.

Please note that we may process your personal information without your knowledge or consent in compliance with the above rules where this is required or permitted by law.

4. Our lawful basis for using this data

Our lawful bases for processing your personal data for the purposes listed in section 3 above are as follows:

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- For the purposes of a), b) c) d) and e), in accordance with the 'legitimate interests' basis – where there's a minimal privacy impact and we have a compelling reason
- For the purposes of d), where it is necessary to perform a contract that we have with you relating to the use of our facilities or sites
- For the purposes of f), where it is necessary for us to comply with a legal obligation that applies to the Foundation

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 would go about withdrawing consent if you wish to do so.

4.1 Our basis for using special category data

For 'special category' data, we only collect and use it when we have both a lawful basis, as set out above, and 1 of the following conditions for processing as set out in UK data protection law:

- We have obtained your explicit consent to use your personal data in a certain way
- We need to perform or exercise an obligation or right in relation to employment, social security or social protection law
- We need to protect an individual's vital interests (i.e. protect your life or someone else's life), in situations where you're physically or legally incapable of giving consent
- The data concerned has already been made manifestly public by you
- We need to process it for the establishment, exercise or defence of legal claims
- We need to process it for reasons of substantial public interest as defined in legislation, including for the prevention or detection of an unlawful act, and to safeguard children or individuals at risk
- We need to process it for health or social care purposes, and the processing is done by, or under the direction of, a health or social work professional or by any other person obliged to confidentiality under law
- We need to process it for public health reasons, and the processing is done by, or under the direction of, a health professional or by any other person obliged to confidentiality under law
- We need to process it for archiving purposes, scientific or historical research purposes, or for statistical purposes, and the processing is in the public interest

For criminal offence data, we will only collect and use it when we have both a lawful basis, as set out above, and a condition for processing as set out in UK data protection law. Conditions include:

- We have obtained your consent to use it in a specific way
- We need to protect an individual's vital interests (i.e. protect your life or someone else's life), in situations where you're physically or legally incapable of giving consent

- The data concerned has already been made manifestly public by you
- We need to process it for, or in connection with, legal proceedings, to obtain legal advice, or for the establishment, exercise or defence of legal rights
- We need to process it for reasons of substantial public interest as defined in legislation (see above)

5. Collecting this data

While some of the 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 or tribunals
- schools or trusts
- The Department for Education

6. How we store this data

We keep personal information about you while you remain involved with the Foundation (for example, as someone who hires our facilities on a regular basis).. We may also keep it beyond this if this is necessary to comply with our legal obligations or to meet our regulatory requirements.

The Foundation uses Tiffin School's IT systems to securely store records. We have put in place appropriate security measures to prevent your personal information being accidentally lost, used or accessed in an unauthorised way, altered or disclosed.

We will dispose of your personal data securely when we no longer have a legal requirement to retain it.

7. Who we share data 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 UK data protection law), we may share personal information about you with:

- Tiffin School for the purposes of securely storing records (see section 6 above).
- Our local authority Royal Borough of Kingston Upon Thames and Achieving for Children (AfC) and Elmbridge Borough Council - to meet our legal obligations to share certain information with it, such as safeguarding concerns Government departments or agencies
- Our regulator, the Charity Commission, or any other relevant body (such as Ofsted or the Information Commissioner's Office)
- Suppliers and service providers
- Our auditors
- Health authorities
- Security organisations
- Professional advisers and consultants
- Charities and voluntary organisations
- Police forces, courts and tribunals

- The organisation/ company you are representing

7.1 Transferring data internationally

Where we transfer your personal data to a third-party country or territory, we will do so in accordance with UK data protection law.

In cases where we have to set up safeguarding arrangements to complete this transfer, you can get a copy of these arrangements by contacting us.

8. Your rights

8.1 How to access personal information that we hold about you

You have a right to make a 'subject access request' to gain access to personal information that we hold about you.

If you make a subject access request, and if we do hold information about you, we will (subject to any exemptions that may apply):

- Give you a description of it
- Tell you why we are holding and processing it, and how long we will keep it for
- Explain where we got it from, if not from you
- Tell you who it has been, or will be, shared with
- Let you know whether any automated decision-making is being applied to the data, and any consequences of this
- Give you a copy of the information in an intelligible form

You may also have the right for your personal information to be transmitted electronically to another organisation in certain circumstances.

If you would like to make a request, please contact us (see 'Contact us' below).

8.2 Your other rights regarding your data

Under data protection law, you have certain rights regarding how your personal data is used and kept safe. For example, you have the right to:

- Object to our use of your personal data
- Prevent your data being used to send direct marketing
- Object to and challenge the use of your personal data for decisions being taken by automated means (by a computer or machine, rather than by a person)
- In certain circumstances, have inaccurate personal data corrected
- In certain circumstances, have the personal data we hold about you deleted or destroyed, or restrict its processing
- Withdraw your consent, where you previously provided it for the collection, processing and transfer of your personal data for a specific purpose
- In certain circumstances, be notified of a data breach
- Make a complaint to the Information Commissioner's Office
- Claim compensation for damages caused by a breach of the data protection regulations

To exercise any of these rights, please contact us (see 'Contact us' below).

9. 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. Alternatively, you can make a complaint to the Information Commissioner's Office:

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

10. Contact us

If you have any questions or concerns, or would like more information about anything mentioned in this privacy notice, please contact Tiffin School who will put you in contact with the Trustees of The Tiffin School Foundation: office@tiffin.kingston.sch.uk, 020 8546 4638.