

Pippa's Guardians Data Protection and Privacy Policy

Overview

At Pippa's Guardians we are committed to protecting and respecting your privacy. This policy explains why we collect personal information, how we use it, the conditions under which we may disclose it to others and how we keep it secure.

We may change this policy from time to time so please check our Policies page at www.pippasguardians.co.uk occasionally where you can find the most up to date version of this policy to ensure that you are up to date and happy with any changes. Please do not hesitate to contact us if you would like any further clarification on this. Our Data Protection Officer is Ben Hughes and Ben can be contacted on 01684 252757 or via email on ben@pippasguardians.co.uk.

How we acquire data

Student information is given to us by parents/guardians or educational agencies that are instructed by parents/guardians of each student.

Information we hold includes, but is not limited to:

- Full names or parents/guardians & students
- Home Address
- School Address
- Contact Details
- Medical Information
- Passport Information
- Image of student ID (Photo page of passport)
- Photos of student with family members

Basic host family information is supplied to us by the individual during their initial application (email or telephone), then further detail is provided by the host family during their "home visit" with a Pippa's Guardians Area Manager.

Information we hold, includes but it not limited to:

- Full names of all household members
- Full names of all regular household guests
- Dates of Birth for household members
- Occupations
- Home Address
- Contact Details
- Photos of family members
- Photos of the homestay property

Sharing your data

Pippa's Guardians treat all data we hold as confidential and it is always treated with discretion. Students and host family data is shared with parent, schools or our Governing Body AEGIS (at inspection time only) and potential host families only*, by the publication of a profile. This profile is built procedurally each time a student or Host family are registered with Pippa's Guardians. (**except in the event of a safeguarding risk or medical emergency where it may be shared with local services, such as medical or social care*). Pippa's Guardians do not share data with any 3rd party*, without permission and no data is ever sold.

Storing your data

- Any physical documents that arrive are added onto our system and filed securely.
- All scanned documents are stored in our dedicated system, which is password protected with two factor authentication.
- Any other information not stored in the form of a document image e.g. information posted directly to head office or given during an online application, is either filed securely or stored securely in our database.

Retention period of information

- For students, our retention period is the length of time a student is under our guardianship plus 7 years from leaving, as all records are integrated within our account's information. For students, all supplied information is stored within our system.
- If a student does not join a school under our guardianship, their information is removed from the system.
- The host family information is also integrated in the same way as students and therefore needs to be held for a minimum of 7 years. For host families, all supplied information is stored within our system. After 7 years of inactivity, the data held for students and host families is automatically deleted.

Security precautions in place to protect the loss, misuse or alteration of your information

Non-sensitive details (your email address etc.) are transmitted normally over the Internet, and this can never be guaranteed to be 100% secure. As a result, while we strive to protect your personal information, we cannot guarantee the security of any information you transmit to us, and you do so at your own risk. We store your information in a variety of ways. Information is held by PC or Mac with relevant safeguards in place using password protection and Anti-Virus and Malware protection and two factor authentication. Cloud backup is used to back up the devices and stored with major providers. Secure file sharing is used to various devices with a major provider.

Privacy Notice

GDPR includes the following rights for individuals:

- **The right to be informed:** Pippa's Guardians is committed to fair processing of information, we do this through our privacy notice explaining how your data will be kept and stored.
- **the right of access:** At any time, anyone can access their data that we store and understand how it is processed. Information will be shared without delay and within one month. This can be extended if agreed by both parties and the request(s) are complex or numerous.
- **the right to rectification:** The accuracy of your information is important to us. You have the right to request a copy of the information we hold about you so that you can ensure its accuracy. You can do this by the following methods:
 - Send an email to office@pippasguardians.co.uk and request the information held on file about you
 - or
 - Telephone: 01684 252757
 - or
 - Write to us at Suite 4, Nimrod House, Sandy's Road, Malvern, Worcestershire WR14 1JJ
- **the right to erasure:** Once a contract has ended with Pippa's Guardians, students and host families have the 'right to be forgotten', and all data will be deleted in accordance with the above policy. This means that we would erase all their data from our records, after 7 years of inactivity. Once a student becomes 16, they have the 'right to be forgotten' and can request this directly themselves.
- **the right to restrict processing:** If data appears to be inaccurate, it will not be processed until verified. If processing the data becomes unlawful, processing will be restricted but not erased.
- **the right to data portability:** Pippa's Guardians recognises the right to data portability.
- **the right to object:** Pippa's Guardians may use data internally for marketing purposes, both text and photos. Everyone has the right to object to their information being used in this way. Simply let us know by emailing office@pippasguardians.co.uk and this will be recorded on our CRM
- **the right not to be subject to automated decision-making including profiling:** This does not apply as no decision is made electronically and all data is handled by someone from Pippa's Guardians.

Charges

There are no charges to store or have access to your data.

Infringement

Pippa's Guardians has a duty to protect your data. If you believe there has been a breach of data protection, please contact our Data Protection Officer Ben Hughes by calling him on 01684 252757 or contacting him by email on ben@pippasguardians.co.uk.

If you are unsatisfied with the outcome of our internal investigation, please contact the Information Commissioner's Office (ICO) on +44 303 123 1113

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Responsibility for Policy Review	Imogen Trevethan/Ben Hughes