



DATA PROTECTION - PRIVACY NOTICE OF THE COMMISSARIAT (THE SCHOOL SHOP)

1. Introduction

The Commissariat is part of Dulwich College Enterprises Ltd (company number 3039344), which is a subsidiary of Dulwich College. The registered office address of Dulwich College Enterprises Ltd is Dulwich College, Dulwich Common, London, SE21 7LD.

During the course of the management of its business, the Commissariat processes personal data (which may be held on paper, electronically, or otherwise) about its customers and recognises the need to treat it in an appropriate and lawful manner, in accordance with Data Protection Legislation¹.

This notice is provided in accordance with the rights of individuals under Data Protection Legislation to understand how their data is used. The notice is provided alongside any other information that the Commissariat may provide about a particular use of customers' personal data and in addition to any other policy documents or contractual terms and conditions that may apply to individual customers.

2. Types of Personal Data processed by the Commissariat

The Commissariat processes personal data about its customers as part of its trading activities, including:

- names, addresses, telephone numbers, e-mail addresses and other contact details;
- debit / credit card or other payment details;
- individuals' bank details;
- details about individuals' orders or pupils' lunch orders.

Generally, we receive personal data directly from the individual placing the order or from someone acting on behalf of and at the instruction of the individual.

3. Why the Commissariat needs to process personal data

The Commissariat is legally entitled to process customers' personal data so as to facilitate the order of and payment for goods and services (including pupil lunches).

We may process individuals' bank details where funds are to be credited following sales in the "Nearly New Shop" on behalf of the "Friends of Dulwich College".

We do not process "sensitive personal data".

¹ The General Data Protection Regulation as retained and applied in the UK ("UK GDPR") and Data Protection Act 2018 and all other data protection law and regulations

4. How Personal Data is Collected and Shared

Direct personal sales in the Commissariat do not capture personal data.

Sales via the Commissariat website require individuals to register or check out as a guest. Either way the customer and order data is captured and: (i) backed up onto the College Retail Systems Group (RGS) system; (ii) shared with a third party website host provider (currently Nitrosell Limited); and (iii) processed by a third party payment gateway service provider (currently Realex Payments Limited).

Dulwich College Enterprises Ltd receives administrative support in a number of areas from Dulwich College (including financial, HR, accounting and legal). Your personal data may be shared with Dulwich College in those contexts.

5. Transfer of data outside the European Economic Area

A number of Dulwich College's IT systems are provided by third parties who are based or use servers outside the European Economic Area (eg providers of hosted databases, websites, communication and management information systems). The College takes steps to put in place suitable safeguards to protect your personal information when processed by such suppliers.

Encrypted data processed by Nitrosell Limited (the Commissariat's third-party website host provider) is backed on a server located in the United States of America pursuant to the Privacy Shield Arrangement between the European Union and the United States. Encrypted personal data may be transferred outside of the European Economic Area for this purpose.

6. Retention

The Commissariat does not keep personal data for longer than is necessary for legitimate and lawful reasons.

With retail records, data would usually be kept for seven years following any transaction for accounting purposes and so as to deal with any issues arising from the sale or with HM Revenue & Customs.

7. Payment Card Industry Data Security Standard (PCI DSS)

The Commissariat is aware of and complies with the Payment Card Industry Data Security Standard (PCI DSS) and implements its comprehensive requirements for enhancing security of payment card account data, including:

- maintaining a firewall configuration to protect cardholder data
- not using vendor-supplied defaults for system passwords and other security parameters
- protecting stored cardholder data
- encrypting transmission of cardholder data across open and public networks

- protecting its systems against malware and regularly updates anti-virus software or programs
- maintaining secure systems and applications
- restricting access to cardholder data by business need to know
- identifying and authenticating access to system components
- restricting physical access to cardholder data
- tracking and monitoring all access to network resources and cardholder data
- regularly testing security systems and processes
- maintaining a policy that addresses information security for all personnel

8. Data Accuracy and Security

The Commissariat will endeavour to ensure that all personal data held in relation to an individual is as up to date and accurate as possible. Individuals registered to use the Commissariat website are responsible for verifying and updating their own personal information when they log onto the website.

The Commissariat will take appropriate technical and organisational steps to ensure the security of personal data about individuals. All Commissariat staff will be made aware of this notice and their duties under Data Protection Legislation.

9. Rights of access to Personal Data - “Subject Access Requests”

Individuals have a legal right of access to personal data about them held by the Commissariat, subject to certain exemptions and limitations set out in Data Protection Legislation. Any individual wishing to access their personal data should put their request in writing to the Clerk to Governors, whose contact details are at the end of this document.

We will endeavour to respond to any such written requests (known as "subject access requests") as soon as is reasonably practicable and in any event within statutory time-limits.

You should be aware that certain data is exempt from the right of access. This may include information which identifies other individuals, originates from a third party (for example a third-party service provider) or information which is subject to legal professional privilege.

10. Queries and Complaints

If you have any query about this Privacy Notice or believe that the Commissariat has breached Data Protection Legislation, please contact the Clerk to Governors, Dulwich College, Dulwich Common, London SE21 7LD. Telephone: 0208 299 9306. Email: legal@dulwich.org.uk

You also have the right to take any complaints about how we process your personal data to the Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF (Tel: 0303 123 1113 Website: www.ico.org.uk/concerns). Please note that the ICO recommends that steps are taken to resolve matters with the Commissariat first, before involving the ICO.

Policy Owner:	Clerk to the Governors
Last Reviewed:	January 2023
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