



## **Stratford-upon-Avon Butterfly Farm Ltd Data Privacy Policy for Schools & Groups 2021**

Approved by the Board & General Manager 20<sup>th</sup> January 2022.

**Stratford-upon-Avon Butterfly Farm (The Farm) recognises and fully respects the privacy and personal data of our employees and customers and is committed to protecting it. For the purpose of this policy The Farm is the data controller.**

**The Farm needs to gather and use certain information about schools and groups.**

**The Data Protection Act 1998 was replaced May 25<sup>th</sup> 2018 by the GDPR, General Data Protection Regulation. The GDPR describes how all organisations must collect, handle and store personal information. The new regulation is enforced by the Information Commissioner's Office, ICO.**

This policy is specifically for schools and groups and ensures that Stratford-upon-Avon Butterfly Farm complies with the GDPR and follows good practice.

**All employees have a responsibility to The Farm and its customers to be data compliant.**

**Data protection policy is transparent and applies to all employees at all times.**

**The Farm will provide adequate and up to date data training to its employees and employees of the farm will adhere to the following:**

- The only persons able to access data covered by this policy should be those who need it for their work.
- Data should not be shared informally. If access to data is required, it should be requested from their line manager.
- Keep passwords and accounts secure. Passwords should be strong and changed regularly.
- Personal data should not be disclosed to unauthorised persons, either within the company or externally.
- Always leave desks clear of sensitive data.
- The **Wi-Fi key code** should be protected and is not to be given out to customers or contractors. Only certain authorised staff have access to the key code.
- Data should be regularly reviewed and updated. If it is no longer required, it should be deleted and disposed of appropriately.
- Suspected **data security breaches or incidents** must be reported immediately to a member of the senior management team. Any breach or incident must be logged on the report sheet and actioned. Any person, persons, school or organisation that has been affected by a breach must be informed within 72 hours.
- **Paper data** to be kept in a secure place where unauthorised persons cannot see it and when not being used kept locked in a filing cabinet. Data printouts should be destroyed securely when no longer required.
- **Digital data** must be protected from unauthorised access, accidental deletion and malicious hacking attempts and is stored securely on our server.
- Areas containing sensitive information should be kept secure at all times.
- Any tradesperson or contractor requiring access to a sensitive data area must be accompanied by a member of staff.
- Any tradesperson or contractor requiring access to a sensitive data area must sign the visitor book.

### **Information We Collect & Process for Schools & Groups**

We may collect and hold the following information from you:

- **Identity Data:** may include booker and lead teachers first name, last name, title.
- **Contact Data:** may include, school or group address, billing address, email address, telephone numbers.
- **Education Data:** may include the name of your school/college/university/community group and course or subject details, age group.
- **Financial Data:** may include bank account and payment card details if you are paying for a group or school visit.
- **Transaction Data:** includes details about payments to and from you and details of the visit you have booked with us.
  
- **Health Data:** includes information about access requirements, information about allergies and information about your health if we are investigating an accident or other incident that has occurred at The Farm.

### **How We Use and Store School and Group Data**

- School and Group information will only be used by The Farm in reference to a current booking.
- Schools and Groups will only be contacted by The Farm in reference to a current booking.
- Invoiced schools are stored digitally via Sage. Sage is password protected and can only be accessed by authorised personnel.
- Booked schools and groups are stored securely as a hard copy.
- School information is only shared with a 2<sup>nd</sup> party if a combination ticket has been booked. The Farm only works with trusted providers. These are currently, Avon Boating Ltd, Shakespeare's Schoolroom & Guildhall and The Mad Museum. Each of these organisations will have their own privacy policy for which they are responsible for.
- The Farm does not currently use direct marketing as part of its marketing campaign to schools and groups or sell online tickets through its own website to schools and groups.

### **How Long We Keep School and Group Information**

The Farm will only keep your personal information in accordance with data protection law for as long as necessary to fulfil the purposes we have collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements. When your information is no longer required, we will dispose and delete in a secure manner.

**Website Privacy: see separate privacy policy for use of our website.**

### **Security**

Stratford-upon-Avon Butterfly Farm is committed to ensure that your information is secure. To prevent unauthorised access or disclosure we use up-to date procedures both physical, managerial and electronic, to secure and safeguard the information we collect from schools and groups and all of our employees, visitors and customers.

You are in control of your personal data and the data we hold on schools and groups. If you have any questions in relation to the information, we may hold about you and your school or group, or use of that information, please contact us at Data Enquiries, The General Manager, Stratford-upon-Avon Butterfly Farm, Swan's Nest Lane, Stratford-upon-Avon, Warwickshire, CV37 7LS.

**Stratford-upon-Avon Butterfly Farm reserves the right to amend this policy at any time and will review it annually.**